

CEQA FINDINGS AND STATEMENT OF OVERRIDING CONSIDERATIONS FOR THE WILLOWBROOK TRANSIT ORIENTED DISTRICT SPECIFIC PLAN

1.0 INTRODUCTION

1.1 PURPOSE

The Regional Planning Commission (“Commission”) of the County of Los Angeles (“County”) hereby certifies that the Commission has reviewed and considered the information contained in the Final Environmental Impact Report (“EIR”), identified below, for the Willowbrook Transit Oriented District Specific Plan (“proposed Specific Plan”). The Commission finds that the Final EIR has been completed in compliance with the California Environmental Quality Act (“CEQA”), Public Resources Code §§21000 *et seq.*; the State CEQA Guidelines, California Code of Regulations, Title 14, §§15000 *et seq.* (“CEQA Guidelines”); and, the County's Environmental Document Reporting Procedures and Guidelines. The Commission also finds that the Final EIR reflects the independent judgment of the Commission. In finding the Final EIR as adequate under CEQA, the Commission hereby adopts these “CEQA Findings and Statement of Overriding Considerations for the Willowbrook Transit Oriented District Specific Plan. The Commission recommends that the County Board of Supervisors (the “Board”) certify the Final EIR pursuant to CEQA in its consideration of the proposed Specific Plan. The Commission also recommends that the Board also adopt these “CEQA Findings and Statement of Overriding Considerations for the Willowbrook Transit Oriented District Specific Plan.

The proposed Specific Plan would amend General Plan Land Use designations of several individual parcels to provide consistency with the General Plan policy direction for mixed use parcels along transportation corridors. In addition, the proposed Specific Plan would facilitate transit oriented development by establishing a new Specific Plan zone for the project area. Within the Specific Plan zone, new designations for land uses would be implemented. In addition, as discussed in more detail below under Proposed Circulation System Improvements, minor changes/improvements to the existing street system would be implemented to improve access, circulation, and walkability between the major land uses within the Specific Plan area, such as the Martin Luther King, Jr. (MLK) Medical Center, Charles R. Drew University of Medicine and Science (CDU), Kenneth Hahn Plaza, Willowbrook Library, Martin Luther King, Jr. (MLK) Center for Public Health, and the Willowbrook/Rosa Parks Station..

The proposed Specific Plan's potentially significant environmental effects were identified and analyzed in the Draft EIR (May 2017) and Final EIR (August 2017) (collectively, “Final EIR”).

Public Resources Code Section 21081 and CEQA Guidelines Section 15091 require that a public agency prepare written findings for identified significant impacts, accompanied by a brief explanation of the rationale for each finding. Specifically, CEQA Guidelines Section 15091 states, in part, that:

- (a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency

makes one or more written findings for each of those significant effects accompanied by a brief explanation of the rationale for each finding. The possible findings are:

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

If significant impacts cannot be avoided or reduced to a less-than-significant level, the decision-making agency is required to balance, as applicable, the benefits of the project against its significant unavoidable environmental impacts when determining whether to approve the project. (Pub. Resources Code, §21081; CEQA Guidelines, §15093.) If the benefits of a project outweigh the significant unavoidable adverse environmental impacts, the adverse effects may be considered "acceptable" with adoption of a statement of overriding considerations. (Pub. Resources Code, §21081, subd. (b); CEQA Guidelines, §15093.)

The Final EIR for the proposed Specific Plan identified potentially significant effects. However, the Commission finds that the inclusion of certain specified mitigation measures as part of the adoption of the proposed Specific Plan will reduce most, but not all, of those effects to less-than-significant levels. Those impacts, which are not reduced to less-than-significant levels, are identified and overridden due to specific benefits of the proposed Specific Plan. (*See Section 6.0, Statement of Overriding Considerations*, below). Therefore, in accordance with CEQA (Pub. Resources Code, §21081; CEQA Guidelines, §§15091-15092), the Commission recommends that the County Board of Supervisors (the "Board") certify the Final EIR pursuant to CEQA in its consideration of the proposed Specific Plan, and adopt these findings, the statement of overriding considerations, and the attached Mitigation Monitoring and Reporting Program ("MMRP"), and recommends that the Board adopt the proposed Specific Plan.

1.2 ORGANIZATION AND FORMAT OF FINDINGS

Section 1.0 contains a summary description of the proposed Specific Plan and background facts relative to the environmental review process. **Section 2.0** identifies the significant impacts of the proposed Specific Plan that cannot be mitigated to a less-than-significant level (even with all feasible mitigation measures having been identified and incorporated into the proposed Specific Plan), while **Section 3.0** identifies the potentially significant impacts of the proposed Specific Plan that would be mitigated to a less-than-significant level with implementation of the identified mitigation measures. **Section 4.0** identifies the proposed Specific Plan's potential environmental impacts that were determined not to be significant. **Section 5.0** discusses the feasibility of the proposed Specific Plan alternatives, and **Section 6.0** presents the statement of overriding considerations.

1.3 SUMMARY OF PROJECT DESCRIPTION

The Specific Plan area is approximately 312 acres and is located within the northwestern portion of the Willowbrook community. The Specific Plan area generally encompasses parcels located south of Imperial Highway, north of East 122nd Street, east of Compton Avenue, and west of South Mona Boulevard. The Specific Plan contains a range of land uses, including: residential, retail, office, educational, institutional facilities, and service facilities. Some of the key land uses that are located within the Specific Plan area include: MLK Medical Center, Charles R. Drew University of Medicine and Science (CDU), Kenneth Hahn Plaza, Willowbrook Library, and Martin Luther King, Jr. (MLK) Center for Public Health. The Specific Plan area also includes the Willowbrook/Rosa Parks Station, which is located at the intersection of the I-105 and South Wilmington Avenue.

The Los Angeles County General Plan was updated in 2015 with a major focus on TOD as a priority throughout the County, and specifically calls for implementation of a TOD plan for the Willowbrook/ Rosa Parks Station area. The proposed Specific Plan was prepared pursuant to General Plan Implementation Program LU-2 Transit Oriented District Program, in order to 1) increase walking, bicycling, and transit ridership and reduce vehicle miles traveled (VMTs); 2) facilitate compact, mixed use development; 3) increase economic activity; 4) facilitate the public investment of infrastructure improvements; and 5) streamline the environmental review process for future infill development projects.

In addition to the General Plan Land Use Element, the Los Angeles County Housing Element Program 6: Transit Oriented Districts Program provides for transit oriented districts within 0.5 mile radius from Metro stations, and specifically requires creation of a transit-oriented district for Willowbrook that would encourage urban infill development on vacant or underutilized sites; promote and encourage transit-oriented development along major transportation corridors; encourage mixed use development to facilitate the linkage between housing and employment opportunities; and promote increased residential density in appropriately designated areas.

Consistent with these General Plan policies and programs, the County of Los Angeles prepared the Draft Willowbrook TOD Specific Plan to implement TOD development and rezone some of the land within the Specific Plan area to include mixed uses, increase housing densities, provide for additional neighborhood-serving retail uses, improve access to transit, and improve bicycle and pedestrian facilities and other public realm facilities, such as street furniture and signage.

The Specific Plan is a County-initiated, Los Angeles County Metropolitan Transit Authority (Metro) grant-funded project that is being proposed to enhance the transit oriented development pattern, promote active transportation, reduce vehicle miles traveled, and improve the public realm in the Willowbrook area. In addition, the proposed Specific Plan is intended to streamline the approval process for future development projects that are consistent with the Specific Plan.

The proposed Specific Plan would amend General Plan Land Use designations of several individual parcels to provide consistency with the General Plan policy direction for mixed use parcels along transportation corridors. In addition, the proposed Specific Plan would facilitate transit oriented development by establishing a new Specific Plan zone for the project area. Within the Specific Plan zone, new designations for land uses would be implemented. In addition, as discussed in more detail below under Proposed

Circulation System Improvements, minor changes/improvements to the existing street system would be implemented to improve access, circulation, and walkability between the major land uses within the Specific Plan area, such as the Martin Luther King, Jr. (MLK) Medical Center, CDU, Kenneth Hahn Plaza, Willowbrook Library, MLK Center for Public Health, and the Willowbrook/Rosa Parks Station. Key access corridors to the Specific Plan area would continue to be Willowbrook Avenue, Compton Avenue, South Mona Avenue, Wilmington Avenue, East 117th Street, East 118th Street, East 119th Street, and East 120th Street. Streetscape improvements, such as landscaping and street furniture are also provided for in the proposed Specific Plan.

The proposed Specific Plan contains the following components:

- Land Use and Urban Design Framework;
- Specific Plan Zones;
- Mobility Plan (roadway, bicycle, pedestrian, and transit facilities)
- Streetscape Improvements
- Infrastructure (water, sewer, storm drain, utilities)
- Economic Development Strategy
- Capital Improvement Plan

The proposed Specific Plan would also establish sustainable design guidelines and performance standards for features, such as scale and mass, building orientation, building articulation and detailing, circulation, parking, and exterior lighting. The new zoning designations would allow for infill and redevelopment TOD opportunities that can serve as catalyst to revitalizing the area.

Specific Plan Goals and Policies

The goals and policies set forth in proposed Specific Plan. They serve as guidelines for decision-making and provide direction for future activities. The seven major goals identified in the Specific Plan include:

- Preserve and enhance the character of the Willowbrook community.
- Improve the Willowbrook/Rosa Parks Station and its environs.
- Encourage transit oriented development.
- Provide affordable housing opportunities.
- Promote active transportation and reduce vehicle miles traveled.
- Improve quality of life for existing residents with improvements to the public realm.
- Improve economic vitality and employment opportunities.

Goal 1: Preserve and enhance the character of the Willowbrook community.

Policy 1.1: Where appropriate, preserve the character of the residential neighborhoods.

Policy 1.2: Provide a mix of land uses in the Mixed Use Zones to accommodate employment, retail, and residential uses, as well as local-serving amenities.

Policy 1.3: Preserve existing neighborhood-serving retail at Kenneth Hahn Plaza.

Policy 1.4: Improve compliance with County zoning and building codes on private property by expanding code enforcement by various County Departments.

Policy 1.5: Facilitate the expansion of the MLK Medical Center and CDU campus that is compatible and sensitive to the surrounding neighborhoods.

Policy 1.6: Coordinate with CDU to integrate the planned growth of the University's campus with the surrounding community, including creating pedestrian linkages and open space connections with other area institutions and the Willowbrook/Rosa Parks Station.

Policy 1.7: Implement the concepts and ideas contained in the MLK Medical Center Campus Master Plan & the Willowbrook MLK Wellness Community Vision by encouraging well-designed and continuous pedestrian paths and connections between the Willowbrook/Rosa Parks Station and the employment, campus, retailing, and residential areas.

Goal 2: Improve the Willowbrook/Rosa Parks Station and its environs.

Policy 2.1: Coordinate with Metro to enhance pedestrian and bicycle connections from the Willowbrook/Rosa Parks Station to the surrounding community.

Policy 2.2: Coordinate with Metro to enhance safety and circulation between the various transit modes at the Willowbrook/Rosa Parks Station to encourage transit use.

Policy 2.3: Work with Metro and Kenneth Hahn Plaza to create better connections and access to the surrounding employment, campus, retail, and residential areas.

Goal 3: Encourage transit oriented development.

Policy 3.1: Provide a variety of housing choices within walking distance of the Willowbrook/Rosa Parks Station.

Policy 3.2: Implement mixed use zoning in targeted areas to promote employment-generating uses proximate to housing and the Willowbrook/Rosa Parks Station.

Policy 3.3: Incentivize lot consolidation where appropriate to facilitate the development of cohesive projects in Mixed Use Zones.

Goal 4: Provide affordable housing opportunities.

Policy 4.1: Preserve existing stock of affordable housing.

Policy 4.2: Promote housing affordability through diversification of housing choices (ownership, rental, single-family, multi-family) for varied income groups.

Goal 5: Promote active transportation and reduce vehicle miles traveled.

Policy 5.1: Provide a multi-modal transportation system of complete streets.

Policy 5.2: Enhance access to transit and the Willowbrook/Rosa Parks Station.

Policy 5.3: Provide a connected pedestrian and bicycle network that links Willowbrook/Rosa Parks Station, Kenneth Hahn Plaza, new mixed use areas, CDU, MLK Medical Center and residential neighborhoods.

Policy 5.4: Facilitate mixed use development that maximizes pedestrian connectivity and minimizes the need for vehicle travel.

Goal 6: Improve quality of life for existing residents with improvements to the public realm.

Policy 6.1: Enhance the public realm with street trees, street furniture, bicycle facilities, sidewalks and pedestrian paths.

Policy 6.2: Provide a consistent canopy of shade trees throughout the Specific Plan area to enhance pedestrian comfort.

Policy 6.3: Provide pedestrian-scaled lighting to improve safety and enhance pedestrian environment.

Policy 6.4: Encourage outdoor dining and seating areas and other pedestrian-friendly uses in mixed use areas.

Policy 6.5: Explore joint use agreements with schools to better utilize existing and future open space resources.

Policy 6.6: Encourage new development to provide public open space as a community benefit. Consider providing incentives to developers for such provisions.

Policy 6.7: Consider building pocket parks and community gardens on County-owned vacant lots.

Goal 7: Improve economic vitality and employment opportunities.

Policy 7.1: Create economic opportunities for the Willowbrook community by fostering a complementary variety of employment, retail, residential, and institutional uses.

Policy 7.2: Build on the Willowbrook community’s economic base as a “healthcare cluster” by working with appropriate partners to provide workforce development opportunities for local residents.

Policy 7.3: Facilitate public-private partnerships to share responsibility for implementing this Specific Plan and achieving its goals.

Policy 7.4: Encourage a mix of national brand and local merchant businesses.

Policy 7.5: Efficiently manage the supply and demand of parking to accommodate customer, commuter, and resident parking, and encourage the use of shared parking where possible.

1.4 INITIAL STUDY AND NOTICE OF PREPARATION

In accordance with *CEQA Guidelines* Section 15082, on October 30, 2015, the County of Los Angeles issued a Notice of Preparation (NOP) and Initial Study, which was sent to the State Clearinghouse, Office of Planning and Research, responsible agencies, and other interested parties. The NOP and Initial Study circulated for approximately thirty days, until November 30, 2015. The NOP requested those agencies with regulatory authority over any aspect of the proposed project to review the issues that would be addressed within the EIR and to identify any additional relevant environmental issues that should be addressed.

In response to the NOP and scoping meeting, comment letters and other input were received from interested agencies, organizations, and others. Based on the results of the County’s NOP and scoping efforts, the following topics were evaluated in the Final EIR:

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| 1. Aesthetics | 8. Land Use and Planning |
| 2. Air Quality | 9. Noise and Vibration |
| 3. Cultural Resources | 10. Population and Housing |
| 4. Geology and Soils | 11. Public Services and Recreation |
| 5. Greenhouse Gas Emissions | 12. Transportation and Traffic |
| 6. Hazards and Hazardous Materials | 13. Utilities |
| 7. Hydrology and Water Quality | |

1.5 ENVIRONMENTAL IMPACT REPORT

CEQA provides a lead agency with the flexibility to prepare different types of EIRs, and to employ different procedural means to focus environmental analysis on the issues appropriate for decision at each level of environmental review. (Pub. Resources Code, §21093, subd. (a).) The Final EIR for the proposed Specific Plan can be classified as a “Program EIR.” A Program EIR may be prepared on a series of actions that can be characterized as one large project and are related either geographically; as logical parts in the chain of contemplated actions; in connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or, as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects that can be

mitigated in similar ways. A program EIR enables an agency to examine the overall effects of the proposed course of action and to take steps to avoid unnecessary adverse environmental effects.

According to Section 15168 of the CEQA Guidelines, a Program EIR will be most helpful in dealing with subsequent activities if it deals with the effects of the program as specifically and comprehensively as possible. With a good and detailed analysis of the program, many subsequent activities could be found to be within the scope of the project described in a Program EIR, and no further environmental documents would be required.

Here, the Final EIR evaluates the broad-scale impacts of the County's proposed Specific Plan. The proposed Specific Plan will implement the County's General Plan, and provide zoning regulations for development of the Specific Plan area. Therefore, the Final EIR, which addresses the potential impacts of the County's goals, objectives, and policies for the unincorporated Willowbrook community, can be thought of as a "first tier" document. It evaluates the large-scale impacts on the environment that can be expected to result from the adoption of the proposed Specific Plan, but does not necessarily address the site-specific impacts that may be caused by each of the individual development projects that may follow and be implemented under the proposed Specific Plan. CEQA requires each of those subsequent development projects to be evaluated for their particular site-specific impacts. These site-specific analyses are typically encompassed in second-tier documents, such as project EIRs, focused EIRs, mitigated negative declarations, and negative declarations on individual development projects subject to the proposed Specific Plan, which typically evaluate the impacts of a single activity undertaken to implement the overall plan. This Final EIR can and should be incorporated by reference into subsequent documents to focus on new or site-specific impacts.

The Draft EIR was released for public review and comment for a period of 45 days from May 12, 2017 through June 26, 2017. A public hearing on the Draft EIR was held for a Los Angeles County Hearing Examiner on June 1, 2017.

The Draft EIR was made available on the County's website (<http://planning.lacounty.gov/willowbrook/eir>), and at the following locations:

- County Department of Regional Planning, 320 West Temple Street, Room 1354, Los Angeles, CA 90012;
- Willowbrook Library, 11838 Wilmington Avenue, Los Angeles, CA 90059

Public hearings before the County's Regional Planning Commission on the proposed Specific Plan and its environmental analysis were held on August 9, 2017.

In August 2017, the Final EIR was completed. The Final EIR includes the Draft EIR and all comments and responses to comments received on the Draft EIR and other information. County staff sent the Final EIR to the Commission for review and made it available to state and local agencies, organizations, and other interested parties. Following release of the Final EIR, the Commission conducted a public hearing on August 9, 2017 regarding the proposed Specific Plan and associated Final EIR, as described above.

The custodian of the record of proceedings is the County's Department of Regional Planning, 320 West Temple Street, Room 1354, Los Angeles, California 90012, and the County's EIR consultant,

Environmental Science Associates, 626 Wilshire Boulevard, Suite 1100, Los Angeles, CA 90017. The project's record includes, but is not limited to:

- The Final EIR for the proposed Specific Plan;
- All reports, memoranda, maps, letters, and other planning documents, including attachments, related documents, and all documents cited, incorporated by reference or relied on in those materials, prepared by the EIR consultant, the County, and Department of Regional Planning staff relating to the EIRs;
- Any minutes and transcripts of all public meetings and public hearings relating to the proposed Specific Plan;
- All notices issued by the County to comply with CEQA, the CEQA Guidelines, or any other law governing the processing and approval of the proposed Specific Plan;
- Matters of common knowledge to the County, which include, but are not limited to: (i) the Los Angeles County General Plan; and (ii) Los Angeles County Subdivision and Planning and Zoning Codes, as amended; and,
- Any other written materials relevant to the County's compliance with CEQA, and its decision on the merits of the proposed Specific Plan, including documents that have been released for public review, and copies of reports, studies or other documents relied on in any environmental documentation for the proposed Specific Plan and either made available to the public during the public comment period or included in the County's files.

2.0 FINDINGS FOCUSING ON SIGNIFICANT UNAVOIDABLE IMPACTS OF THE PROJECT

This section identifies the significant unavoidable impacts that require a Statement of Overriding Considerations be issued by the County upon approval of the proposed Specific Plan. Based on the analysis contained in the Final EIR, certain impacts to air quality, cultural resources, greenhouse gas emissions, and transportation and traffic have been determined to fall within this “significant unavoidable impact” category. In addition to the identification of significant unavoidable impacts, the discussion, below, identifies significant impacts resulting from the proposed Specific Plan to air quality, cultural resources, greenhouse gas emissions, and transportation and traffic, which have been mitigated to less than significant based upon the identified mitigation measures.

2.1 AIR QUALITY

2.1.1 Consistency with the Applicable Air Quality Management Plan

The Specific Plan implements infill development, located in an urbanized area with existing infrastructure, near a transit line. Thus, the Specific Plan would support AQMP objectives to reduce trips, and would aid in the implementation of the AQMP. In addition, the employment generating uses that would be implemented with the Specific Plan would provide new employment opportunities for residents that could reduce regional commute trips. Although the Specific Plan would comply with all rules and regulations as implemented by SCAQMD and CARB, and would conform to the standards and guidelines of the County General Plan, implementation of the Specific Plan would exceed SCAG’s growth projections, and thus would not be consistent with the 2012 AQMP, and therefore, the Specific Plan would not comply with

Consistency Criterion 1. Therefore, the implementation of the Specific Plan would result in significant impact related to conflict with an applicable air quality plan.

Findings

The Commission finds that there are no feasible mitigation measures available to avoid or mitigate the significant air quality impacts attributable to the proposed Specific Plan. A significant impact could only be avoided by revising the project to comply with existing growth projections for the Willowbrook community, which could be accomplished only through implementation of project alternatives, rather than mitigation measures.

Pursuant to Public Resources Code Section 21081, subdivision (a)(1), changes or alterations have been required in, or incorporated into, the proposed Specific Plan which would minimize emissions of criteria air pollutants, and thereby mitigate, in part, the significant impacts attributable to the proposed Specific Plan in relation to consistency with the regional air quality management plan, as identified in the Final EIR. However, there are no feasible mitigation measures that would reduce the identified significant impacts to a level below significant. Therefore, these impacts must be considered unavoidably significant even after implementation of all feasible mitigation measures. Pursuant to Public Resources Code Section 21081, subdivision (a)(3), as described in the Statement of Overriding Considerations, the Commission has determined that specific economic, legal, social, technological, or other considerations make infeasible the alternatives identified in the EIR, and the identified air quality impacts are thereby acceptable because of specific overriding considerations (*see Section 6.0*, below), which outweigh the significant unavoidable air quality impacts of the proposed Specific Plan.

2.1.2 Air Quality Standards/Violations

The estimated maximum construction emissions for build out of the proposed Specific Plan would exceed the South Coast Air Quality Management District's ("SCAQMD") construction thresholds for VOCs, NO_x, and CO. In addition, Localized Significance Thresholds for NO_x would be exceeded during construction. Operational emissions associated with the build out of the proposed Specific Plan were modeled and the estimated regional operations emissions that would result from the proposed Specific Plan would exceed the SCAQMD's applicable thresholds for ROG, NO_x, CO, PM₁₀ and PM_{2.5}.

Mitigation Measures

The Commission finds that there are no feasible mitigation measures available to avoid or mitigate the significant air quality impacts attributable to the proposed Specific Plan in relation to compliance with applicable air quality standards, as identified above, to a less-than-significant level. However, the following feasible mitigation measures would substantially lessen the significant impacts identified in the Final EIR:

Mitigation Measure AIR-1: The County shall ensure that project approvals within the Specific Plan area require that all onsite construction vehicles and equipment with horsepower greater than 50 shall meet, at a minimum, USEPA Tier IV interim engine certification requirements. If Tier IV interim equipment is not available, the contractor may apply other available technologies available for construction equipment such that it would achieve a comparable reduction in NO_x and PM emissions comparable to that of Tier IV

construction equipment. Where alternatives to USEPA Tier IV are utilized, the contractor shall be required to show evidence to the County that these alternative technologies would achieve comparable emissions reductions. Certifications or alternative reduction strategies shall be required prior to receiving a construction permit. In addition, contractors shall limit heavy-duty construction equipment idling time to 3 minutes, limit non-heavy-duty construction equipment idling time to 5 minutes, maintain construction equipment in good operating condition, use construction equipment that uses low-polluting fuels to the extent available and feasible (i.e. compressed natural gas, liquid petroleum gas, and unleaded gasoline).

Mitigation Measure AIR-2: The County shall ensure that project approvals within the Specific Plan area require that all active construction areas shall be watered at least four times daily to reduce fugitive dust emissions from grading, excavation, and other ground preparation. Watering shall be sufficient to prevent airborne dust from leaving the site. Increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. Reclaimed water shall be used whenever possible.

Mitigation Measure AIR-3 Reduction or elimination of fireplaces within residential development such that there are no fireplaces within 95 percent of all new/redeveloped single family residential development or 100 percent of all multifamily residential development (new and redeveloped) within the Specific Plan area. Compliance would be ensured through County review prior to the issuance of a building permit.

Mitigation Measure AIR-4 All commercial development will use low-VOC architectural coating such that interior coatings do not exceed 10 grams per liter (g/l) of VOC content and exterior coatings do not exceed 100 g/l. This measure is to be made a condition of approval for continued upkeep of the property.

Mitigation Measure AIR-5 All commercial developments will use low-VOC cleaning supplies. This measure is to be made a condition of approval for continued upkeep of the property.

Mitigation Measure AIR-6 All new development shall comply with the Title 24 requirements in effect at the time of construction and shall, at a minimum, exceed 2013 Title 24 energy efficiency standards by 15 percent.

Findings

The Commission finds that the above mitigation measures are feasible, are adopted, and will substantially lessen the air quality impacts attributable to the proposed Specific Plan. Pursuant to Public Resources Code Section 21081, subdivision (a)(1), changes or alterations have been required in, or incorporated into, the proposed Specific Plan which would mitigate, in part, the significant air quality impacts attributable to the proposed Specific Plan, as identified in the Final EIR. However, there are no feasible mitigation measures that would reduce all the identified significant impacts to a level below significant. Therefore, these impacts must be considered unavoidably significant even after implementation of all feasible mitigation measures. Pursuant to Public Resources Code Section 21081, subdivision (a)(3), as described in the Statement of Overriding Considerations, the Commission has determined that specific economic, legal, social, technological, or other considerations make infeasible the alternatives identified in the EIR, and the identified air quality impacts are thereby acceptable because of specific overriding considerations (*see Section 6.0*, below), which outweigh the significant unavoidable air quality impacts of the proposed Specific Plan.

2.1.3 Cumulatively Considerable Net Increase of a Criteria Pollutant for which the Project Region is in Non-attainment

As the SCAB is currently in non-attainment for ozone, PM₁₀, and PM_{2.5}, cumulative development consisting of the proposed Specific Plan along with other reasonably foreseeable future projects in the Basin as a whole could violate an air quality standard or contribute to an existing or projected air quality violation. Daily emissions associated with the proposed Specific Plan would exceed the SCAQMD's thresholds for ROG, NO_x, and CO. Therefore, because project pollutants that are currently in federal non-attainment of NAAQS (i.e., ozone, PM₁₀, and PM_{2.5}), the proposed Specific Plan's increased emissions of non-attainment criteria pollutants would be significant.

Mitigation Measures

The Commission finds that there are no feasible mitigation measures available to avoid or mitigate the significant air quality impacts attributable to the proposed Specific Plan in relation to compliance with applicable air quality standards, as identified above, to a less-than-significant level. However, implementation of Mitigation Measures AIR-1 through AIR-7 would substantially lessen the significant impacts identified in the Final EIR.

2.1.4 Expose Sensitive Receptors to Substantial Pollutant Concentrations, Including Increased Levels of TACs

ARB's Handbook includes the recommendation to avoid the siting of new sensitive land uses (e.g., residences, schools) within 500 feet of freeways, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day. In addition, the County of Los Angeles Department of Public Health includes a recommendation within the *Air Quality Recommendations for Local Jurisdictions* to include a buffer of at least 500 feet between freeways and sensitive land uses such as residences. The implementation of the proposed Specific Plan would allow the development of residential uses to be located within 500 feet of a freeway. Therefore, the location of the proposed residential uses would not be in concurrence with ARB or County of Los Angeles Department of Public Health recommendations. Based on the criteria in the ARB guidance document, it can be ascertained that the proposed Specific Plan would have the potential to expose sensitive receptors to TACs from mobile sources including 260 Metro trains and two to six freight trains, daily along with diesel trucks along the I-105 freeway and major roadways through the Specific Plan area to an extent that health risks could result. This impact would be a significant impact.

Mitigation Measure

The Commission finds that implementation of feasible mitigation measures would reduce significant air quality impacts attributable to the proposed Specific Plan in relation to exposure of sensitive receptors to substantial pollution concentrations to a less-than-significant level.

Mitigation Measure AIR-7: The County shall ensure that project approvals within the Specific Plan area require that any sensitive uses proposed to be located within 300 feet of the Metro tracks and within 500 feet of freeways shall be equipped with a filtered air supply system to maintain units under positive pressure when windows are closed. The ventilation system, whether a central HVAC (heating, ventilation and air

conditioning) or a unit-by-unit filtration system, shall include high-efficiency filters meeting minimum efficiency reporting value (MERV) 13, per American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) Standard 52.2 (equivalent to approximately ASHRAE Standard 52.1 Dust Spot 85%). The efficiency rating of the filtration system shall be determined based on a health risk assessment conducted for the proposed development, such that cancer and non-cancer risks are reduced to a 10 in one million increase in cancer risk, and less than 1 for non-cancer risk, unless thresholds are superseded by more current SCAQMD threshold. Air intake systems for HVAC shall be placed based on exposure modeling to minimize roadway air pollution sources. The ventilation system shall be designed by an engineer certified by ASHRAE, who shall provide a written report documenting that the system offers the best available technology to minimize outdoor to indoor transmission of air pollution. Disclosure to the occupants (buyers and renters) shall be required regarding the proximity of Metro tracks (within a 300-foot radius) and freeways (within a 500-foot radius), the occurrence of diesel emissions from Metro trains and freeways heavy truck traffic), and the potential increased cancer and non-cancer risks associated with the development location.

2.1.4 Findings

The Commission finds that the above mitigation measures are feasible, are adopted, and reduce the potentially significant air quality impacts of the proposed Specific Plan to less-than-significant levels. Accordingly, the Commission finds that, pursuant to Public Resources Code Section 21081, subdivision (a)(1), and CEQA Guidelines Section 15091, subdivision (a)(1), changes or alterations have been required in, or incorporated into, the proposed Specific Plan, which mitigate or avoid all potentially significant air quality impacts of the proposed Specific Plan as identified in the Final EIR.

2.2 CULTURAL RESOURCES

2.2.1 Historical Resources

The proposed project involves modifications, rehabilitation, and possibly demolition to buildings within the Martin Luther King, Jr. Medical Center Campus Historic District and its four contributing buildings (Augustus F. Hawkins Comprehensive Medical Health Center, Multi-Service Ambulatory Care Center, Interns and Physicians Building, and Dr. H. Claude Hudson Auditorium) that could affect historic resources, and result in substantial adverse changes in the significance of historical resources such that the historic district or its contributors would no longer be eligible for historic register listing.

Mitigation Measures

The Commission finds that there are no feasible mitigation measures available to avoid or mitigate the significant historical resources impacts attributable to the proposed Specific Plan in relation to compliance with applicable historical resources standards, as identified above, to a less-than-significant level. However, implementation of Mitigation Measures CUL-1 through CUL-4 would substantially lessen the significant impacts identified in the Final EIR.

CUL-1: Impacts to four significant historical resources that are eligible for listing and located within the MLK Subarea (Multi-Service Ambulatory Care Center (MACC), Augustus F. Hawkins Comprehensive Medical Health Center, Interns and Physicians Building, and Dr. H. Claude Hudson Auditorium) and the

integrity of the Martin Luther King, Jr. Medical Center Campus Historic District (a fifth historic resource that is eligible for listing) shall be reduced to below the level of significance through utilization of the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines of Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings for any proposed alterations, including all site work, structural upgrades, architectural, and mechanical systems improvements and repairs. The work shall conform to the standards and guidelines for "rehabilitation." Conformance with the Secretary of the Interior's Standards shall be monitored by an architectural historian or historic architect who meets the Secretary of the Interior's Professional Qualification Standards. Completion of this mitigation measure shall be monitored and enforced by the County of Los Angeles.

CUL-2: Impacts resulting from demolition or substantial alteration of significant historical resources not in conformance with the Secretary of the Interior's Standards shall be reduced to the maximum extent feasible through archival documentation of as-found condition. Prior to the initiation of construction activities, the County of Los Angeles shall ensure that documentation of the Martin Luther King, Jr. Medical Center Campus Historic District, Multi-Service Ambulatory Care Center (MACC), Augustus F. Hawkins Comprehensive Medical Health Center, Interns and Physicians Building, and/or Dr. H. Claude Hudson Auditorium is completed in accordance with Historic American Buildings Survey (HABS) requirements for donated material. The documentation shall be in the form of a Historic American Building Survey and shall comply with the Secretary of the Interior's Standards for Architectural and Engineering Documentation. The documentation shall include large-format photographic recordation, detailed historic narrative report, measured architectural drawings, and compilation of historic research. The documentation shall be completed by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualification Standards for History and/or Architectural History. The original archival-quality documentation shall be offered as donated material to Historic American Building Survey for inclusion in the Library of Congress. Archival copies of the documentation also would be available at the Martin Luther King, Jr. Medical Center campus and maintained by the County of Los Angeles.

CUL-3: Impacts resulting from the loss of integrity of the Martin Luther King, Jr. Medical Center Campus Historic District such that its significance is materially impaired will be reduced to the maximum extent feasible through the development of a retrospective exhibit detailing the history of the Martin Luther King, Jr. Medical Center Campus Historic District, its significance, and its important details and features. The retrospective exhibit shall be in the form of a physical exhibit installed on the Martin Luther King, Jr. Medical Center Campus, which is located either within a building or on a freestanding kiosk or comparable structure or installation on the property. The exhibit shall commemorate the historic appearance of the district and provide the public with sufficient information to understand its historic significance.

The exhibit shall be prepared by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualification Standards for History and/or Architectural History. The exhibit shall be completed within a period of no more than two years from the date of completion of the portion of the project that would result in the loss of integrity of the historical resources eligible for listing.

CUL-4: Demolition of structures that meet the eligibility requirements for the CRHR and/or the County of Los Angeles Register shall be avoided. If demolition of a portion of an eligible structure cannot be feasibly avoided as determined by the County of Los Angeles, the alterations of a structure eligible as a historical

resource shall be accomplished in accordance with the Secretary of the Interior's *Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings*. To ensure compliance with this measure, the County shall determine the need for a historic resources evaluation of a structure if a structure is proposed for demolition or alteration and is or will be 50 years or older prior to project construction, or if a structure is proposed for demolition or alteration that affect the eligibility of a historic resource in the immediate surroundings of a structure proposed for demolition or alteration.

Findings

The Commission finds that the above mitigation measures are feasible, are adopted, and will substantially lessen the historical resources impacts attributable to the proposed Specific Plan. Pursuant to Public Resources Code Section 21081, subdivision (a)(1), changes or alterations have been required in, or incorporated into, the proposed Specific Plan which would mitigate, in part, the significant cultural resources impacts attributable to the proposed Specific Plan, as identified in the Final EIR. However, there are no feasible mitigation measures that would reduce all the identified significant impacts to a level below significant. Therefore, these impacts must be considered unavoidably significant even after implementation of all feasible mitigation measures. Pursuant to Public Resources Code Section 21081, subdivision (a)(3), as described in the Statement of Overriding Considerations, the Commission has determined that specific economic, legal, social, technological, or other considerations make infeasible the alternatives identified in the EIR, and the identified air quality impacts are thereby acceptable because of specific overriding considerations (*see Section 6.0*, below), which outweigh the significant unavoidable air quality impacts of the proposed Specific Plan.

2.2.2 Archaeological Resources

Given the high archaeological sensitivity of the Specific Plan area, previously unknown and unrecorded archaeological resources may be unearthed during excavation and grading activities for individual projects. This can occur in already developed areas, as older buildings are known to have been built on top of or within archaeological deposits. Although much of the project area is already heavily developed, potentially significant buried archaeological resources could still exist within the project area, beneath and between structures and roads. If previously undiscovered artifacts or remains are uncovered during excavation or construction, significant impacts could occur.

Mitigation Measure

The Commission finds that, based on substantial evidence in the record, potentially significant archaeological resources impacts of the proposed Specific Plan are reduced to less-than-significant levels by implementation of the following mitigation measure:

CUL-5: Avoidance, preservation or data recovery shall occur for archaeological resources that could be affected by ground disturbing activities and are found to be significant resources. To ensure that developments in accordance with the Specific Plan do not result in significant impacts to pre-historic or historic archaeological resources, the following shall be implemented.

Individual development projects or other ground disturbing activities such as installation of utilities, shall be subject to a Phase I cultural resources inventory on a project-specific basis prior to the County's approval of project plans. The study shall be carried out by a qualified archaeologist, defined as an archaeologist meeting the Secretary of the Interior's Standards for professional archaeology. The cultural resources inventory would consist of: a cultural resources records search to be conducted at the South Central Coastal Information Center; a Sacred Lands File Search by the Native American Heritage Commission (NAHC) and with interested Native Americans identified by the NAHC; a pedestrian archaeological survey where deemed appropriate by the archaeologist; and recordation of all identified archaeological resources on California Department of Parks and Recreation 523 forms. If potentially significant cultural resources are encountered during the survey, the County shall require that the resources are evaluated for their eligibility for listing in the California Register of Historical Resources and for significance as a historical resource or unique archaeological resource per CEQA Guidelines Section 15064.5. Recommendations shall be made for treatment of these resources if found to be significant. Per CEQA Guidelines Section 15126.4(b)(3), project redesign and preservation in place shall be the preferred means of mitigation to avoid impacts to significant cultural resources, including prehistoric and historic archaeological sites, locations of importance to Native Americans, human remains, historical buildings, structures and landscapes. Methods of avoidance may include, but shall not be limited to, project re-route or re-design, project cancellation, or identification of protection measures such as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures, which may include data recovery or other appropriate measures, in consultation with the County, and local Native American representatives expressing interest.

During project-level construction, should prehistoric or historic subsurface cultural resources be discovered, all activity in the vicinity of the find shall stop and a qualified archaeologist will be contacted to assess the significance of the find according to CEQA Guidelines Section 15064.5. If any find is determined to be significant, the archaeologist shall determine, in consultation with the County, and local Native American groups expressing interest, appropriate avoidance measures or other appropriate mitigation. Per CEQA Guidelines Section 15126.4(b)(3), project redesign and preservation in place shall be the preferred means to avoid impacts to significant cultural resources. Methods of avoidance may include, but shall not be limited to, project re-route or re-design, project cancellation, or identification of protection measures such as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures in consultation with the County, which may include data recovery or other appropriate measures. All significant cultural materials recovered will be, as necessary and at the discretion of the consulting archaeologist and in consultation with local Native American groups expressing interest, subject to scientific analysis, professional museum curation, and documentation according to current professional standards.

Findings

The Commission finds that the above mitigation measure is feasible, is adopted, and would reduce the potentially significant archaeological resources impacts of the proposed Specific Plan to less-than-significant levels. Accordingly, the Commission finds that, pursuant to Public Resources Code Section 21081, subdivision (a)(1), and CEQA Guidelines Section 15091, subdivision (a)(1), changes or alterations

have been required in, or incorporated into, the proposed Specific Plan, which mitigate or avoid all potentially significant archaeological resources impacts of the proposed Specific Plan as identified in the Final EIR.

2.2.3 Paleontological Resources

While shallow excavation or surface grading is unlikely to uncover paleontological resources, deeper excavation into older sediments may uncover significant fossils. Thus, any deep excavations (five feet below ground surface and deeper) in the Specific Plan area could result in impacts to paleontological resources.

Mitigation Measures

The Commission finds that, based on substantial evidence in the record, potentially significant paleontological resources impacts of the proposed Specific Plan are reduced to less-than-significant levels by implementation of the following mitigation measure:

CUL-6: The project applicant shall retain a qualified paleontologist (in accordance with the Society of Vertebrate Paleontologists) to monitor all ground-disturbing activities in native soils or sediments beginning at five feet below ground surface and deeper. If the paleontologist, upon observing initial earthwork, determines there is low potential for discovery, no further action shall be required and the paleontologist shall submit a memo to the County confirming findings of low potential.

If the qualified paleontologist, upon observing initial earthwork, determines there is a moderate to high potential for discovery, a qualified paleontologist or paleontological monitor (retained by the County) shall monitor all mass grading and excavation activities. Monitoring will be conducted in areas of grading or excavation in undisturbed formation sediments, as well as where over-excavation of surficial alluvial sediments will encounter these formations in the subsurface. Paleontological monitors shall be equipped to salvage fossils as they are unearthed to avoid construction delays and to remove samples of sediment that are likely to contain the remains of small fossil invertebrates and vertebrates. The monitor must be empowered to temporarily halt or divert equipment to allow removal of abundant or large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface, or if present, are determined on exposure and examination by qualified paleontological personnel to have low potential to contain fossil resources.

Should any paleontological resources (i.e., fossils) be uncovered during project construction activities, all work within a 100-foot radius of the discovery site shall be halted or diverted to other areas on the site and the County shall be immediately notified. The qualified paleontologist shall evaluate the finds and recommend appropriate next steps to ensure that the resource is not substantially adversely impacted, including but not limited to avoidance, preservation in place, excavation, documentation, curation, data recovery, or other appropriate measures. Further, ground disturbance shall not resume within a 100-foot radius of the discovery site until an agreement has been reached between the project applicant, the qualified paleontologist, and the County as to the appropriate preservation or mitigation measures to ensure that the resource is not substantially adversely impacted.

Any recovered paleontological specimens shall be identified to the lowest taxonomic level possible and prepared for permanent preservation. Screen-washing of sediments to recover small invertebrates and vertebrates shall occur if necessary.

Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage shall occur at an institutional repository approved by the County. The paleontological program shall include a written repository agreement prior to the initiation of mitigation activities.

A final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered and necessary maps and graphics to accurately record their original location. The report, when submitted to an accepted by the County, shall signify satisfactory completion of the project program to mitigation impacts to any potential nonrenewable paleontological resources (i.e., fossils) that might have been lost or otherwise adversely affected without such a program in place.

Findings

The Commission finds that the above mitigation measures are feasible, are adopted, and reduce the potentially significant paleontological resources impacts of the proposed Specific Plan to less-than-significant levels. Accordingly, the Commission finds that, pursuant to Public Resources Code Section 21081, subdivision (a)(1), and CEQA Guidelines Section 15091, subdivision (a)(1), changes or alterations have been required in, or incorporated into, the proposed Specific Plan, which mitigate or avoid all potentially significant paleontological resources impacts of the proposed Specific Plan as identified in the Final EIR.

2.2.4 Discovery of Human Remains

Archaeological site records indicate that human remains have been identified during construction of buildings and pipeline trenching near the Specific Plan area. In the event that human remains, including those interred outside of formal cemeteries, are discovered during construction of development permitted by the proposed Specific Plan, the human remains could be inadvertently damaged, which could constitute a significant impact.

Mitigation Measures

The Commission finds that, based on substantial evidence in the record, significant impacts attributable to the potential discovery of human remains as the result of development permitted by the proposed Specific Plan are reduced to less-than-significant levels by implementation of the following mitigation measure:

CUL-7: If human remains are encountered, the County or its contractor shall halt work in the vicinity (within 100 feet) of the find and contact the Los Angeles County Coroner in accordance with PRC Section 5097.98 and Health and Safety Code Section 7050.5. If the County Coroner determines that the remains are Native American, the NAHC will be notified in accordance with Health and Safety Code Section 7050.5, subdivision (c), and PRC Section 5097.98. The NAHC will designate an MLD for the remains per PRC Section 5097.98. Until the landowner has conferred with the MLD, County shall ensure that the

immediate vicinity where the discovery occurred is not disturbed by further activity, is adequately protected according to generally accepted cultural or archaeological standards or practices, and that further activities take into account the possibility of multiple burials.

Findings

The Commission finds that the above mitigation measure is feasible, is adopted, and would reduce significant impacts attributable to the potential discovery of human remains as the result of development permitted by the proposed Specific Plan to less-than-significant levels. Accordingly, the Commission finds that, pursuant to Public Resources Code Section 21081, subdivision (a)(1), and CEQA Guidelines Section 15091, subdivision (a)(1), changes or alterations have been required in, or incorporated into, the proposed Specific Plan, which mitigate or avoid all potentially significant impacts of the proposed Specific Plan related to the discovery of human remains as identified in the Final EIR.

2.2.5 Tribal Cultural Resources

Consultation with the Gabrieleno Band of Mission Indians – Kizh Nation (Tribe) was undertaken pursuant to the provisions of AB 52. The Tribe did not identify known tribal cultural resources; however, the Tribe indicated that the project area is sensitive for prehistoric and ethnohistoric Native American archaeological resources. Although no tribal cultural resources have been identified within the proposed project site, there is a potential for buried unknown archaeological resources that may be eligible for the California Register of Historical Resources or a local register of historical resources and could meet the definition of historical resource, unique archaeological resource, and/or tribal cultural resources. If previously undiscovered artifacts or remains are uncovered during excavation or construction, significant impacts could occur.

Mitigation Measures

The Commission finds that, based on substantial evidence in the record, potentially significant tribal cultural resources impacts of the proposed Specific Plan are reduced to less-than-significant levels by implementation of Mitigation Measures CUL-5 and CUL-7.

2.2.6 Findings

The Commission finds that the above mitigation measures are feasible, are adopted, and reduce the potentially significant tribal cultural resources impacts of the proposed Specific Plan to less-than-significant levels. Accordingly, the Commission finds that, pursuant to Public Resources Code Section 21081, subdivision (a)(1), and CEQA Guidelines Section 15091, subdivision (a)(1), changes or alterations have been required in, or incorporated into, the proposed Specific Plan, which mitigate or avoid all potentially significant tribal cultural resources impacts of the proposed Specific Plan as identified in the Final EIR.

2.3 GREENHOUSE GAS EMISSIONS

2.3.1 Emissions of Greenhouse Gases

The proposed Specific Plan's total net annual GHG emissions would be approximately 63,899 MTCO_{2e} per year (detailed calculations are included in Appendix B of this EIR). Given a service population (total net increase of residents and jobs [employees] at buildout) increase of 11,410, annual GHG emissions per

service population for the proposed Specific Plan would be 5.6 MTCO₂e/SP. This would not exceed the SCAQMD's proposed efficiency level of 6.6 MTCO₂e/SP for 2020, but would exceed SCAQMD's proposed efficiency level of 4.1 MTCO₂e/SP for 2035. Therefore, the net increase in GHG emissions resulting from implementation of the Specific Plan would be significant for 2035.

Mitigation Measures

The Commission finds that there are no feasible mitigation measures available to avoid or mitigate the significant air quality impacts attributable to the proposed Specific Plan in relation to compliance with applicable air quality standards, as identified above, to a less-than-significant level. However, implementation of Mitigation Measures AIR-1 through AIR-6 would substantially lessen the significant impacts identified in the Final EIR.

2.3.3 Findings

The Commission finds that the above mitigation measures AIR-1 through AIR-7 are feasible, are adopted, and will substantially lessen the proposed Specific Plan's greenhouse gas emissions impacts. Pursuant to Public Resources Code Section 21081, subdivision (a)(1), changes or alterations have been required in, or incorporated into, the proposed Specific Plan which would mitigate, in part, the significant greenhouse gas emissions impacts attributable to the proposed Specific Plan, as identified in the Final EIR. However, there are no feasible mitigation measures that would reduce all the identified significant greenhouse gas emissions impacts to a level below significant. Therefore, greenhouse gas emissions impacts must be considered unavoidably significant even after implementation of all feasible mitigation measures. Pursuant to Public Resources Code Section 21081, subdivision (a)(3), as described in the Statement of Overriding Considerations, the Commission has determined that specific economic, legal, social, technological, or other considerations make infeasible the alternatives identified in the EIR, and the identified greenhouse gas emissions are thereby acceptable because of specific overriding considerations (*see Section 6.0*, below), which outweigh the significant unavoidable cultural resources impacts of the proposed Specific Plan.

2.4 TRANSPORTATION AND TRAFFIC

2.4.1 Conflict with an Applicable Plan, Ordinance, or Policy Establishing Performance Measures for the Circulation System

Intersection level of service analysis was undertaken to compare the volume to capacity (V/C) ratios at area intersection for Existing and Existing Plus Project Conditions to determine the incremental difference in V/C ratios that would be caused by the Specific Plan. The analysis determined that with the addition of Project traffic, levels of service at area intersection would exceed applicable impact thresholds at 21 of the 66 intersections studied during the AM peak hour, and at 26 of the 66 intersections studied during the PM peak hour.

An evaluation of future cumulative and cumulative plus project traffic in the vicinity of the proposed Specific Plan indicated that applicable thresholds would be exceeded at 22 of the 66 intersections studied during the AM peak hour, and at 31 of the 66 intersections analyzed in the PM peak hour. Under future cumulative conditions, the proposed Specific Plan would add between 133 and 315 trips to three ramps in the AM peak hour, and up to 47 trips at the other off-ramps analyzed. For the Existing Plus Project

Conditions, the queues would not exceed the total ramp storage lengths at any of the ramps, except at the same two locations where storage lengths are currently exceeded under existing conditions. Under future cumulative conditions, the proposed Specific Plan would add between 12 and 342 trips to the freeway segments analyzed in the AM peak hour. In the PM peak hour, the proposed Specific Plan would add between 15 and 397 trips to the freeway segments analyzed. The level of service would not change at any mainline freeway segment due to the Project, except at three locations.

Mitigation Measures (Existing Plus Project): Unincorporated Los Angeles County

The Commission finds that, based on substantial evidence in the record, potentially significant transportation and circulation impacts of the proposed Specific Plan are reduced to less-than-significant levels at the following seven intersections by implementation of mitigation measures TRAF-1, TRAF-2, TRAF-3, TRAF-7, TRAF-10, TRAF-11, and TRAF-12.

- Avalon Boulevard & El Segundo Boulevard (Mitigation Measure TRAF-1)
- Central Avenue & El Segundo Boulevard (Mitigation Measure TRAF-2)
- Central Avenue & Rosecrans Avenue (Mitigation Measure TRAF-3)
- Wilmington Avenue & 120th Street (Mitigation Measure TRAF-7)
- Alameda Street & 103rd Street (Mitigation Measure TRAF-10)
- Alameda Street & Imperial Highway (Mitigation Measure TRAF-11)
- Alameda Street & El Segundo Boulevard (Mitigation Measure TRAF-12)

The feasibility of physical intersection improvements needed to achieve acceptable level of service standards was investigated for all intersection locations where the proposed Specific Plan would cause significant traffic impacts. This evaluation looked at the feasibility of re-striping traffic lanes and/or adding traffic lanes to modify intersection lane configurations, roadway widenings, and potential changes to signal timing and phasing. Roadway widenings were determined to generally be infeasible (due to the lack of available right-of-way, location of existing buildings, lack of jurisdictional control over adjacent right-of-way, or inconsistency with County General Plan policies). Lane re-striping was determined to be feasible if they would not result in inadequate lane widths (minimum lane widths of 10' and 12' for curb lanes was maintained). Signal timing/phasing changes were determined to be feasible as long as they would improve intersection operations and not cause other problems or generate impacts at other locations. Implementation of a TDM Program was determined to be a realistic option to reduce vehicle trips, but would not constitute a quantifiable mitigation measure that could be implemented by the County of Los Angeles.

Thus, the Commission further finds that there are no feasible mitigation measures available to avoid or mitigate the significant transportation and traffic impacts attributable to the proposed Specific Plan in relation to compliance with applicable level of service standards to a less-than-significant level. However, feasible mitigation measures identified below would substantially lessen the significant impacts identified in the Final EIR at the following five intersections within unincorporated Los Angeles County:

- Compton Avenue & Imperial Highway (Mitigation Measure TRAF-4)

- Wilmington Avenue & 105th Street (Mitigation Measure TRAF-5)
- Wilmington Avenue & 118th Street (Mitigation Measure TRAF-6)
- Wilmington Avenue & El Segundo Boulevard (Mitigation Measure TRAF-8)
- Imperial Highway & I-105 w/b ramps (Mitigation Measure TRAF-9)

Mitigation Measure TRAF-1: Avalon Blvd & El Segundo Blvd. Prior to the issuance of a building permit, the County of Los Angeles shall ensure the restriping of the northbound approach to add a right turn lane prior to an individual project exceeding the County's significance criteria. The timing of this improvement shall be determined through the preparation of a traffic evaluation by the individual project applicant and reviewed by the County. This improvement would modify the approach from one left turn lane, one through lane, and one through-right turn lane to one left turn lane, two through lanes and a separate right turn lane. This can be accomplished by narrowing the median to 3 feet. This would need to occur all the way to an alley located approximately 100 feet south of the intersection. The bus stop at this approach would continue to be located at the same location; however, buses would be allowed to go straight through the intersection. This was a mitigation measure in the Martin Luther King Jr. Medical Campus EIR. In addition, the County of Los Angeles shall ensure the restriping of the southbound approach to provide a separate right turn lane by narrowing the median to 2 feet prior to an individual project exceeding the County's significance criteria. The timing of this improvement shall be determined through the preparation of a traffic evaluation by the individual project applicant and reviewed by the County. This improvement would modify the approach from one left turn lane, one through lane, and one through-right turn lane to one left turn lane, two through lanes and a separate right turn lane.

This measure would mitigate impacts at this location to a less-than-significant level.

Mitigation Measure TRAF-2: Central Ave & El Segundo Blvd. Prior to the issuance of a building permit, the County of Los Angeles shall ensure the restriping of the southbound approach to provide a separate right-turn lane and restriping the northbound approach by reducing the median to 2 feet before an individual project exceeds the County's significance criteria. The timing of this improvement shall be determined through the preparation of a traffic evaluation by the individual project applicant and reviewed by the County. This improvement would modify both approaches from one left turn lane, one through lane, and one through-right turn lane to one left turn lane, two through lanes and a separate right turn lane. Buses would be allowed to go through the intersection from the right-turn lane. This was a mitigation measure in the Martin Luther King Jr. Medical Campus EIR. In addition, the County of Los Angeles shall ensure the restriping of the westbound approach to provide a separate right turn lane by narrowing the median to 2 feet prior to an individual project exceeding the County's significance criteria. The timing of this improvement shall be determined through the preparation of a traffic evaluation by the individual project applicant and reviewed by the County. This improvement would modify the approach from one left turn lane, one through lane, and one through-right turn lane to one left turn lane, two through lanes and a separate right turn lane.

This measure would mitigate impacts at this location to a less-than-significant level.

Mitigation Measure TRAF-3: Central Ave & Rosecrans Ave. Prior to the issuance of a building permit, the County of Los Angeles shall ensure the restriping of the westbound approach to provide a separate right-turn lane by narrowing the median to 2 feet before an individual project exceeds the County's significance criteria. The timing of this improvement shall be determined through the preparation of a traffic evaluation by the individual project applicant and reviewed by the County. This improvement would modify the approach from one left turn lane, one through lane, and one through-right turn lane to one left turn lane, two through lanes and a separate right turn lane. Buses would be allowed to go through the intersection from the right-turn lane. This was a mitigation measure in the Martin Luther King Jr. Medical Campus EIR.

This measure would mitigate impacts at this location to a less-than-significant level.

Mitigation Measure TRAF-4: Compton Ave & Imperial Hwy. Prior to the issuance of a building permit, the County of Los Angeles shall ensure the restriping of the westbound approach to provide a separate right-turn lane before an individual project exceeds the County's significance criteria. The timing of this improvement shall be determined through the preparation of a traffic evaluation by the individual project applicant and reviewed by the County. This improvement would modify the approach from one left turn lane, one through lane, and one through-right turn lane to one left turn lane, two through lanes and a separate right turn lane. This was a mitigation measure in the Martin Luther King Jr. Medical Campus EIR.

For the Existing Plus Project Condition, the proposed restriping would partially mitigate the impacts in both the AM and PM peak hours. In the AM peak hour, the level of service would remain at LOS F. In the PM peak hour, it would remain at LOS E. Additional improvements to improve the AM and PM peak hours would be required so that there is not an exceedance of the County's significant impact criteria. However, additional improvements would require the acquisition of additional right-of-way. Because the widening of roadways is not consistent with the County's General Plan land use policies as discussed above, additional improvements requiring right-of-way acquisition at this intersection are considered not feasible.

Significance after Mitigation: Significant and Unavoidable. Because the existing curb-to-curb roadway width does not allow for additional improvements at this intersection located in the jurisdiction of the County of Los Angeles and additional rights-of-way would be required for additional improvements, the County determined that there are no feasible mitigation measures at this intersection.

Mitigation Measure TRAF-5: Wilmington Ave & I-105 e/b Ramps. Prior to the issuance of a building permit, the County of Los Angeles shall ensure that an additional eastbound lane will be installed by widening (reducing the raised median on the ramp) the off-ramp before an individual project exceeds the County's significance criteria. The timing of this improvement shall be determined through the preparation of a traffic evaluation by the individual project applicant and reviewed by the County. This improvement would modify the approach from a left-turn lane and a right-turn lane to a left-turn lane, shared left-right turn lane and a separate right-turn lane. In addition, the County of Los Angeles shall ensure that an additional northbound left-turn lane is provided by reducing the median width. This improvement would modify the approach from a left-turn lane and three through lanes to dual left-turn lanes and three through lanes. These were mitigation measures in the Martin Luther King Jr. Medical Campus EIR.

Significance after Mitigation: Significant and Unavoidable. Although the above improvements would fully mitigate the impacts, the required installation of an additional eastbound lane is proposed on the off-ramp

that is not under the jurisdiction of the County of Los Angeles. Therefore, the County cannot guarantee that the timing of implementing this off-ramp improvement would occur prior to the intersection exceeding the County's significant impact criteria.

Mitigation Measure TRAF-6: Wilmington Ave & 118th St. Prior to the issuance of a building permit, the County of Los Angeles shall ensure the restriping of the eastbound approach of 118th Street to provide a separate right-turn lane before an individual project exceeds the County's significance criteria. The timing of this improvement shall be determined through the preparation of a traffic evaluation by the individual project applicant and reviewed by the County. This improvement would modify the eastbound approach from a shared left-through-right lane to a shared left-through lane and a right turn lane. This was a mitigation measure in the Martin Luther King Jr. Medical Campus EIR.

For the Existing Plus Project Condition, this improvement would partially mitigate the impacts in both the AM and PM peak hours. In the AM peak hour, the level of service would remain at LOS F. In the PM peak hour, it would improve to LOS E. Additional improvements to improve the AM and PM peak hours would be required so that there is not an exceedance of the County's significant impact criteria. However, additional improvements would require the acquisition of additional right-of-way. Because the widening of roadways is not consistent with the County's General Plan land use policies as discussed above, additional improvements requiring right-of-way acquisition at this intersection are considered not feasible.

Significance after Mitigation: Significant and Unavoidable. Because the existing curb-to-curb roadway width does not allow for additional improvements at this intersection located in the jurisdiction of the County of Los Angeles and additional rights-of-way would be required for additional improvements, the County determined that there are no feasible mitigation measures at this intersection beyond the proposed restriping improvement.

Mitigation Measure TRAF-7: Wilmington Ave & 120th St (East). Prior to the issuance of a building permit, the County of Los Angeles shall ensure that 120th Street west of Wilmington Avenue (the driveway to the MLK Medical Campus) is widened for 250 feet, on the south side by 2 feet and the eastbound approach is restriped to provide dual left-turn lanes before an individual project exceeds the County's significance criteria. The timing of this improvement shall be determined through the preparation of a traffic evaluation by the individual project applicant and reviewed by the County. This improvement would modify the approach from a left-through lane and a right-turn lane to dual left-turn lanes, a through lane, and a right-turn lane. This was a mitigation measure in the Martin Luther King Jr. Medical Campus EIR.

This measure would mitigate impacts at this location to a less-than-significant level.

Mitigation Measure TRAF-8: Wilmington Ave & El Segundo Blvd. Prior to the issuance of a building permit, the County of Los Angeles shall ensure the restriping of the eastbound and westbound approaches to add separate right-turn lanes before an individual project exceeds the County's significance criteria. The timing of this improvement shall be determined through the preparation of a traffic evaluation by the individual project applicant and reviewed by the County. This improvement would allow buses to go through the intersection from the right-turn lanes. This improvement would modify both approaches from a left-turn lane, a through lane, and a through-right lane to a left-turn lane, two through lanes, and a right-turn lane. This was a mitigation measure in the Martin Luther King Jr. Medical Campus EIR.

For the Existing Plus Project Conditions, the proposed restriping would partially mitigate the impact in the AM peak hour (the level of service would improve to LOS C), and would fully mitigate the impact in the PM peak hour. Additional improvements to improve the AM peak hour would be required so that there is not an exceedance of the County's significant impact criteria. However, additional improvements would require the acquisition of additional right-of-way. Because the widening of roadways is not consistent with the County's General Plan land use policies as discussed above, additional improvements requiring right-of-way acquisition at this intersection are considered not feasible.

Significance after Mitigation: Significant and Unavoidable. Because the existing curb-to-curb roadway width does not allow for additional improvements at this intersection located in the jurisdiction of the County of Los Angeles and additional rights-of-way would be required for additional improvements, the County determined that there are no feasible mitigation measures at this intersection.

Mitigation Measure TRAF-9: Imperial Hwy & I-105 w/b Ramps. Prior to the issuance of a building permit, the County of Los Angeles shall ensure that a third northbound left-turn lane is provided by widening the off-ramp by 10 feet for approximately 150 feet to 200 feet before an individual project exceeds the County's significance criteria. The timing of this improvement shall be determined through the preparation of a traffic evaluation by the individual project applicant and reviewed by the County. This improvement would modify the approach from a left-turn lane, a left-through lane, and a right-turn lane to dual left-turn lanes, a left-through lane, and a right-turn lane. This was a mitigation measure in the Martin Luther King Jr. Medical Campus EIR.

For the Existing Plus Project Condition, this measure would partially mitigate the impacts in both the AM and PM peak hours, and the level of service would improve to LOS D in both peak hours. Additional improvements to improve the AM and PM peak hours would be required so that there is not an exceedance of the County's significant impact criteria. However, additional improvements would require the acquisition of additional right-of-way. Because the widening of roadways is not consistent with the County's General Plan land use policies as discussed above, additional improvements requiring right-of-way acquisition at this intersection are considered not feasible.

Significance after Mitigation: Significant and Unavoidable. Although the above improvement would partially mitigate the AM and PM peak hour impacts, the required widening of the off-ramp is not under the jurisdiction of the County of Los Angeles. Therefore, the County cannot guarantee that the timing of implementing this off-ramp improvement would occur prior to the intersection exceeding the County's significant impact criteria. In addition, because the existing curb-to-curb roadway width does not allow for additional improvements at this intersection and additional rights-of-way would be required for additional improvements, the County determined that there are no feasible mitigation measures at this intersection.

Mitigation Measure TRAF-10: Alameda St & 103rd St. Prior to the issuance of a building permit, the County of Los Angeles shall ensure the restriping of the eastbound approach for a separate left-turn lane before an individual project exceeds the County's significance criteria. The timing of this improvement shall be determined through the preparation of a traffic evaluation by the individual project applicant and reviewed by the County. This improvement would modify the approach from a shared left/right lane to a

left-turn lane and a shared left/right lane. This was a mitigation measure in the Martin Luther King Jr. Medical Campus EIR.

This measure would mitigate impacts at this location to a less-than-significant level.

Mitigation Measure TRAF-11: Alameda St & Imperial Hwy. Prior to the issuance of a building permit, the County of Los Angeles shall ensure the restriping of the southbound approach for dual right-turn lanes before an individual project exceeds the County's significance criteria. The timing of this improvement shall be determined through the preparation of a traffic evaluation by the individual project applicant and reviewed by the County. This improvement would modify the approach from a left-turn lane, two through lanes, and a right-turn lane to dual left-turn lanes, two through lanes, and a separate right-right lane. This is a modification of the mitigation measure in the Martin Luther King Jr. Medical Campus EIR.

This measure would mitigate impacts at this location to a less-than-significant level.

Mitigation Measure TRAF-12: Alameda St & El Segundo Blvd. Prior to the issuance of a building permit, the County of Los Angeles shall ensure the restriping of the northbound and southbound approaches to provide separate right-turn lanes before an individual project exceeds the County's significance criteria. The timing of this improvement shall be determined through the preparation of a traffic evaluation by the individual project applicant and reviewed by the County. This improvement would modify both approaches from a left-turn lane, a through lane, and a through-right lane to a left-turn lane, two through lanes, and a right-turn lane. This was a mitigation measure in the Martin Luther King Jr. Medical Campus EIR.

This measure would mitigate impacts at this location to a less-than-significant level.

Mitigation Measures (Existing Plus Project): City of Compton

The Commission finds that, because needed improvements are located outside of the County's jurisdiction, the County cannot guarantee that implementation would occur prior to intersections exceeding the City of Compton's significant impact criteria. In addition, the County cannot guarantee that the City of Compton would establish a proportionate share funding program to improve these intersections or acquire additional right-of-way to provide the necessary improvements at these intersections to improve the levels of service to meet the City of Compton's significance criteria. Because of the uncertainty of the timing of implementation and the establishment of a proportionate share funding program by the City of Compton, the implementation of improvements set forth for six intersections within the City of Compton cannot be guaranteed, and the resulting impacts are significant and unavoidable.

Mitigation Measure TRAF-13: Wilmington Ave & Greenleaf Blvd. Prior to issuance of a grading permit, each project applicant shall determine their project's proportionate share funding of acquiring additional right-of-way and implementing additional improvements through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Compton. The proportionate share funding of the additional right-of-way acquisition and improvement to improve the AM and PM peak hour levels of service shall be provided by the project applicant if the City of Compton has established a proportionate share funding mechanism for the improvement at this intersection.

Mitigation Measure TRAF-14: Compton Ave & El Segundo Blvd. Prior to the issuance of a grading permit for each individual project, the project applicant shall determine their project's proportionate share funding of restriping the eastbound and westbound approaches to provide separate right-turn lanes by narrowing the medians to 2 feet. This proportionate share funding shall be determined through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Compton. The proportionate share funding shall be provided by the project applicant if the City of Compton has established a proportionate share funding mechanism.

In the Existing Plus Project Condition, the above restriping would partially mitigate the impact in the AM peak hour (and the level of service would improve to LOS D), and would partially mitigate the impact in the PM peak hour. Additional improvements to improve the AM peak hour would be required so that there is not an exceedance of the City of Compton's significant impact criteria. However, additional improvements would require the acquisition of additional right-of-way. To address this additional impact, the project applicant shall provide the following in addition to the funding for the restriping improvements identified above.

Prior to the issuance of a grading permit, each project applicant shall determine their project's proportionate share funding of acquiring additional right-of-way and implementing additional improvements through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Compton. The proportionate share funding of the additional right-of-way acquisition and improvement to further improve the AM peak hour level of service shall be provided by the project applicant if the City of Compton has established a proportionate share funding mechanism for the improvement at this intersection.

Mitigation Measure TRAF-15: Wilmington Ave & Rosecrans Ave. Prior to the issuance of a grading permit for each individual project, the project applicant shall determine their project's proportionate share funding of restriping the northbound approach to provide a separate right-turn lane by narrowing the median to 2 feet. This improvement would modify the approach from a left-turn lane, a through lane, and a through-right lane to a left-turn lane, two through lanes, and a right-turn lane. This proportionate share funding shall be determined through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Compton. The proportionate share funding shall be provided by the project applicant if the City of Compton has established a proportionate share funding mechanism for the improvement at this intersection.

In the Existing Plus Project Condition, this mitigation measure would partially mitigate the impacts in the AM peak hour and the level of service would remain at LOS E, and would partially mitigate the impact in the PM peak hour and the level of service would improve to LOS D. Additional improvements to improve the AM and PM peak hours would be required so that there is not an exceedance of the City of Compton's significant impact criteria. However, additional improvements would require the acquisition of additional right-of-way. To address this additional impact, the project applicant shall provide the following in addition to the funding for the restriping improvements identified above.

Prior to the issuance of a grading permit, each project applicant shall determine their project's proportionate share funding of acquiring additional right-of-way and implementing additional improvements through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Compton. The

proportionate share funding of the additional right-of-way acquisition and improvement to further improve the AM and PM peak hours level of service shall be provided by the project applicant if the City of Compton has established a proportionate share funding mechanism for the improvement at this intersection.

Mitigation Measure TRAF-16: Wilmington Ave & W Compton Blvd. Prior to issuance of a grading permit, each project applicant shall determine their project's proportionate share funding of acquiring additional right-of-way and implementing additional improvements through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Compton. The proportionate share funding of the additional right-of-way acquisition and improvement to improve the PM peak hour level of service shall be provided by the project applicant if the City of Compton has established a proportionate share funding mechanism for the improvement at this intersection.

Mitigation Measure TRAF-17: Wilmington Ave & Alondra Blvd. Prior to the issuance of a grading permit for each individual project, the project applicant shall determine their project's proportionate share funding of restriping the westbound approach to provide a separate right-turn lane by narrowing the median to 3 feet. This improvement would modify the approach from a left-turn lane, a through lane, and a through-right lane to a left-turn lane, two through lanes, and a right-turn lane. This proportionate share funding shall be determined through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Compton. The proportionate share funding shall be provided by the project applicant if the City of Compton has established a proportionate share funding mechanism for the improvement at this intersection.

In the Existing Plus Project Condition, the above restriping would fully mitigate the impact in the AM peak hour and the level of service would remain at LOS D, and would partially mitigate the impact in the PM peak hour, and the level of service would remain at LOS E. Additional improvements to improve the PM peak hour would be required so that there is not an exceedance of the City of Compton's significant impact criteria. However, additional improvements would require the acquisition of additional right-of-way. To address this additional impact, the project applicant shall provide the following in addition to the funding for the restriping improvements identified above.

Prior to the issuance of a grading permit, each project applicant shall determine their project's proportionate share funding of acquiring additional right-of-way and implementing additional improvements through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Compton. The proportionate share funding of the additional right-of-way acquisition and improvement to further improve the PM peak hour level of service shall be provided by the project applicant if the City of Compton has established a proportionate share funding mechanism for the improvement at this intersection.

Mitigation Measure TRAF-18: Wilmington Ave & Walnut St. Prior to the issuance of a grading permit for each individual project, the project applicant shall determine their project's proportionate share funding of restriping and modifying the eastbound approach from a left-turn lane, a through lane, and a right-turn lane to left-turn lane, a through lane, and a through-right lane. It requires converting Walnut Street east of the intersection from one lane eastbound to two-lanes eastbound for a minimum of 400 feet providing an 11-foot lane and a 12-foot curb lane prior to merging back to one lane, and prohibiting on-street parking for the same distance. The proportionate share funding shall be determined through the preparation of a

traffic evaluation to be reviewed by the County of Los Angeles and City of Compton. The proportionate share funding shall be provided by the project applicant if the City of Compton has established a proportionate share funding mechanism for the improvement at this intersection.

In the Existing Plus Project Condition, this mitigation measure, if implemented, would fully mitigate the impacts in the PM peak hour. In the PM peak hour, the level of service would improve to LOS C.

Mitigation Measures (Existing Plus Project): City of Lynwood

The Commission finds that, although Mitigation Measure TRAF-19 could reduce impacts in Lynwood to less than significant, the proposed improvements are not located within the jurisdiction of the County of Los Angeles. Therefore, the County cannot guarantee that the timing of implementation would occur prior to the intersection exceeding the City of Lynwood's significant impact criteria. In addition, there is uncertainty if the City of Lynwood would establish a proportionate share funding program to restripe the intersection of Imperial Highway and State Street to improve the levels of service so that the City of Lynwood's significance criteria are not exceeded. Because of the uncertainty of the timing of implementation and the establishment of a proportionate share funding program by the City of Lynwood, cannot be guaranteed, the resulting impacts at this intersection are significant and unavoidable.

Mitigation Measure TRAF-19: Imperial Hwy & State St. Prior to the issuance of a grading permit for each individual project, the project applicant shall determine their project's proportionate share funding of restriping the northbound and southbound approaches to provide separate right-turn lanes. This improvement would modify both approaches from a left-turn lane, a through lane, and a through-right lane to a left-turn lane, two through lanes, and a right-turn lane. These improvements require removal of two on-street parking spaces on each approach. The proportionate share funding shall be determined through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Lynwood. The proportionate share funding shall be provided by the project applicant if the City of Lynwood has established a proportionate share funding mechanism for the improvement at this intersection.

In the Existing Plus Project Condition, this mitigation measure, if implemented, would fully mitigate the impacts in the PM peak hour.

Mitigation Measures (Existing Plus Project): City of Los Angeles

The Commission finds that, although Mitigation Measures could reduce impacts within the City of Los Angeles to less than significant, the proposed improvements are not located within the jurisdiction of the County of Los Angeles. Therefore, the County cannot guarantee that the timing of implementation would occur prior to the intersection exceeding the City of Los Angeles' significance criteria. In addition, there is uncertainty if the City of the City of Los Angeles would establish a proportionate share funding program to restripe this intersection to improve the levels of service so that the City of Los Angeles' significance criteria are not exceeded. Because of the uncertainty of the timing of implementation and the establishment of a proportionate share funding program by the City of Los Angeles, the implementation of improvements set forth for six intersections within the City of Los Angeles cannot be guaranteed, and the resulting impacts at these intersections are significant and unavoidable

Mitigation Measure TRAF-20: Avalon Blvd & Imperial Hwy. Prior to issuance of a grading permit, each project applicant shall determine their project's proportionate share funding of acquiring additional right-of-way and implementing additional improvements through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Los Angeles. The proportionate share funding of the additional right-of-way acquisition and improvement to improve the AM and PM peak hour levels of service shall be provided by the project applicant if the City of Los Angeles has established a proportionate share funding mechanism for the improvement at this intersection.

Mitigation Measure TRAF-21: Avalon Blvd & 120th St. Prior to issuance of a grading permit, each project applicant shall determine their project's proportionate share funding of acquiring additional right-of-way and implementing additional improvements through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Los Angeles. The proportionate share funding of the additional right-of-way acquisition and improvement to improve the PM peak hour level of service shall be provided by the project applicant if the City of Los Angeles has established a proportionate share funding mechanism for the improvement at this intersection.

Mitigation Measure TRAF-22: Central Ave & Imperial Hwy. Prior to issuance of a grading permit, each project applicant shall determine their project's proportionate share funding of acquiring additional right-of-way and implementing additional improvements through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Los Angeles. The proportionate share funding of the additional right-of-way acquisition and improvement to improve the AM and PM peak hour levels of service shall be provided by the project applicant if the City of Los Angeles has established a proportionate share funding mechanism for the improvement at this intersection.

Mitigation Measure TRAF-23: Central Ave & I-105 WB Ramps. Prior to the issuance of a grading permit for each individual project, the project applicant shall determine their project's proportionate share funding of restriping the westbound approach from a left-turn lane, a through-left lane, and right-turn lane, to a left-turn lane, a through-right lane, and a right-turn lane. This proportionate share funding shall be determined through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Los Angeles. The proportionate share funding shall be provided by the project applicant if the City of Los Angeles has established a proportionate share funding mechanism. In the Existing Plus Project Condition, this mitigation measure would fully mitigate the impacts in both the AM and PM peak hours.

Mitigation Measure TRAF-24: Central Ave & 120th St. Prior to the issuance of a grading permit for each individual project, the project applicant shall determine their project's proportionate share funding of restriping the northbound approach to provide a separate right-turn lane. This improvement would modify the approach from a left-turn, a through lane, and a through-right lane to a left-turn lane, two through lanes, and a separate right-turn lane. This was a mitigation measure in the Martin Luther King Jr. Medical Campus EIR. The proportionate share funding of the restriping improvement to improve the AM and PM peak hour levels of service shall be provided by the project applicant if the City of Los Angeles has established a proportionate share funding mechanism for the improvement at this intersection.

In the Existing Plus Project Condition, this mitigation measure would partially mitigate the impacts in both the AM and PM peak hours, with the level of service remaining at LOS D in both peak hours. Additional

improvements to improve the AM and PM peak hours would be required so that there is not an exceedance of the City of Los Angeles' significant impact criteria. However, additional improvements would require the acquisition of additional right-of-way. To address this additional impact, the project applicant shall provide the following in addition to the funding for the restriping improvements identified above.

Prior to the issuance of a grading permit, each project applicant shall determine their project's proportionate share funding of acquiring additional right-of-way and implementing additional improvements through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Los Angeles. The proportionate share funding of the additional right-of-way acquisition and improvement to further improve the AM and PM peak hours level of service shall be provided by the project applicant if the City of Los Angeles has established a proportionate share funding mechanism for the improvement at this intersection.

Mitigation Measure TRAF-25: Wilmington Ave & 112th St. Prior to the issuance of a grading permit for each individual project, the project applicant shall determine their project's proportionate share funding of installation of a new traffic signal at this location because the signal warrant analysis indicated that a traffic signal would be warranted. The proportionate share funding shall be determined through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Los Angeles. The proportionate share funding shall be provided by the project applicant if the City of Los Angeles has established a proportionate share funding mechanism for the improvement at this intersection. In the Existing Plus Project Condition, this mitigation measure would fully mitigate the impacts in both the AM and PM peak hours.

Mitigation Measures (Existing Plus Project): Freeway Segment

The Commission finds that, because the additional right-of-way acquisition and improvements needed to improve one impacted freeway segment are not within the jurisdiction of the County of Los Angeles, the County cannot guarantee implementation of needed improvements or their timing. In addition, there is uncertainty if Caltrans would establish a proportionate share funding program to acquire additional right-of-way and make improvements along this freeway segment. Because implementation of improvements and establishment of a proportionate share funding program by Caltrans cannot be guaranteed, the resulting impacts are significant and unavoidable.

Mitigation Measure TRAF-26: I-110 southbound between 135th St & Rosecrans Ave. Prior to issuance of a grading permit, the following shall apply to site specific development applications within the Specific Plan area. The applicant shall consult with Caltrans to determine the improvements necessary to mitigate the significant impacts to State highway mainline facilities that would result from the addition of project traffic. Once the improvements are determined, the applicant shall either construct the necessary improvements or pay an equitable share consistent with applicable law towards construction of the improvements. In furtherance of this requirement, if the EIR identifies significant impacts to Caltrans mainline facilities, the applicant shall enter into a traffic mitigation agreement with Caltrans before or within 6 months of the project EIR.

Mitigation Measures (Cumulative Plus Project): City of Compton

The Commission finds that, because needed improvements are located outside of the County's jurisdiction, the County cannot guarantee that the timing of implementation would occur prior to the intersection exceeding the City of Compton's significant impact criteria. In addition, the County cannot guarantee that the City of Compton would establish a proportionate share funding program to improve this intersection as well as acquire additional right-of-way to provide the necessary improvements at this intersection to improve the levels of service so that the City of Compton's significance criteria are not exceeded. Because of the uncertainty of the timing of implementation and the establishment of a proportionate share funding program by the City of Compton, the implementation of improvements set forth for six intersections within the City of Compton cannot be guaranteed, and the resulting impacts are significant and unavoidable.

Mitigation Measure TRAF-27: Willowbrook Ave & Rosecrans Ave. Prior to issuance of a grading permit, each project applicant shall determine their project's proportionate share funding of acquiring additional right-of-way and implementing additional improvements through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Compton. The proportionate share funding of the additional right-of-way acquisition and improvement to improve the AM and PM peak hour levels of service shall be provided by the project applicant if the City of Compton has established a proportionate share funding mechanism for the improvement at this intersection.

Mitigation Measure TRAF-28: Central Ave & Compton Blvd. Prior to the issuance of a grading permit for each individual project, the project applicant shall determine their project's proportionate share funding of restriping the northbound approach to provide a separate right-turn lane by narrowing the median to 2 feet. This would modify the approach from a left-turn lane, a through lane, and a through-right lane to a left-turn lane, two through lanes, and a right-turn lane. This improvement requires removal of five on-street parking spots on the northbound approach. The proportionate share funding shall be determined through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Compton. The proportionate share funding shall be provided by the project applicant if the City of Compton has established a proportionate share funding mechanism for the improvement at this intersection.

If implemented, this mitigation measure would fully mitigate the impacts in the PM peak hour and the level of service would improve to LOS C. However, as noted above the County of Los Angeles cannot guarantee implementation of this mitigation measure.

Mitigation Measure TRAF-29: Central Ave & Alondra Blvd. Prior to the issuance of a grading permit for each individual project, the project applicant shall determine their project's proportionate share funding of restriping the northbound and southbound approaches to provide a separate right-turn lane by narrowing the median to 2 feet. This would modify both approaches from a left-turn lane, a through lane, and a through-right lane to a left-turn lane, two through lanes, and a right-turn lane. The proportionate share funding shall be determined through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Compton. The proportionate share funding shall be provided by the project applicant if the City of Compton has established a proportionate share funding mechanism for the improvement at this intersection.

Significance after Mitigation: Significant and Unavoidable. If implemented, this mitigation measure would fully mitigate the impacts in the PM peak hour and the level of service would remain at LOS D. However, as noted above the County of Los Angeles cannot guarantee implementation of this mitigation measure.

Mitigation Measures (Cumulative Plus Project): Freeway Segment LOS

The Commission finds that, because the additional right-of-way acquisition and improvements needed to improve three impacted freeway segments are not within the jurisdiction of the County of Los Angeles, the County cannot guarantee implementation of needed improvements or their timing. In addition, there is uncertainty if Caltrans would establish a proportionate share funding program to acquire additional right-of-way and make improvements along these freeway segments. Because implementation of improvements and establishment of a proportionate share funding program by Caltrans cannot be guaranteed, the resulting impacts are significant and unavoidable.

Mitigation Measure TRAF-30: I-105 westbound between Avalon Blvd and Central Ave. Prior to issuance of a grading permit, the following shall apply to site specific development applications within the Specific Plan area. The applicant shall consult with Caltrans to determine the improvements necessary to mitigate the significant impacts to State highway mainline facilities that would result from the addition of project traffic. Once the improvements are determined, the applicant shall either construct the necessary improvements or pay an equitable share consistent with applicable law towards construction of the improvements. In furtherance of this requirement, if the EIR identifies significant impacts to Caltrans mainline facilities, the applicant shall enter into a traffic mitigation agreement with Caltrans before or within 6 months of the project EIR.

Mitigation Measure TRAF-31: I-105 westbound between Compton Ave and Wilmington Ave. Prior to issuance of a grading permit, the following shall apply to site specific development applications within the Specific Plan area. The applicant shall consult with Caltrans to determine the improvements necessary to mitigate the significant impacts to State highway mainline facilities that would result from the addition of project traffic. Once the improvements are determined, the applicant shall either construct the necessary improvements or pay an equitable share consistent with applicable law towards construction of the improvements. In furtherance of this requirement, if the EIR identifies significant impacts to Caltrans mainline facilities, the applicant shall enter into a traffic mitigation agreement with Caltrans before or within 6 months of the project EIR.

Mitigation Measure TRAF-32: I-105 westbound between State St & Long Beach Blvd. Prior to issuance of a grading permit, the following shall apply to site specific development applications within the Specific Plan area. The applicant shall consult with Caltrans to determine the improvements necessary to mitigate the significant impacts to State highway mainline facilities that would result from the addition of project traffic. Once the improvements are determined, the applicant shall either construct the necessary improvements or pay an equitable share consistent with applicable law towards construction of the improvements. In furtherance of this requirement, if the EIR identifies significant impacts to Caltrans mainline facilities, the applicant shall enter into a traffic mitigation agreement with Caltrans before or within 6 months of the project EIR.

Future Plus Project Off-Ramp Analysis

The Commission finds that, because the additional right-of-way acquisition and improvements needed to improve one impacted freeway segment are not within the jurisdiction of the County of Los Angeles, the County cannot guarantee implementation of needed improvements or their timing. In addition, there is uncertainty if Caltrans would establish a proportionate share funding program to acquire additional right-of-way and make improvements along this freeway segment. Because implementation of improvements and establishment of a proportionate share funding program by Caltrans cannot be guaranteed, the resulting impacts are significant and unavoidable.

Mitigation Measure TRAF-33: I-110 SB off-ramp at El Segundo Blvd. Prior to issuance of a grading permit, each project applicant shall determine their project's proportionate share funding of acquiring additional right-of-way and implementing additional improvements at this off-ramp through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and Caltrans. The proportionate share funding of the additional right-of-way acquisition and improvement to improve the AM and PM peak hour levels of service shall be provided by the project applicant if Caltrans has established a proportionate share funding mechanism for the improvement at this intersection.

2.4.2 Conflict with Congestion Management Program (CMP)

In the AM peak hour, the addition of vehicle trips generated by the proposed Specific Plan would cause significant impacts at two freeway CMP locations:

- I-105 westbound (West of I-710, East of Harris Ave)
- I-105 westbound (East of Bellflower Blvd. West of I-605)

In the PM peak hour, the addition of vehicle trips generated by the proposed Specific Plan would cause significant impacts at four CMP freeway locations:

- I-105 eastbound (West of I-710, East of Harris Ave)
- I-105 westbound (West of I-710, East of Harris Ave)
- I-105 eastbound (East of Bellflower Blvd. West of I-605)
- I-105 westbound (East of Bellflower Blvd. West of I-605)

Mitigation Measures

The Commission finds that, because the additional right-of-way acquisition and improvements needed to improve three impacted freeway segments are not within the jurisdiction of the County of Los Angeles, the County cannot guarantee implementation of needed improvements or their timing. In addition, there is uncertainty if Caltrans would establish a proportionate share funding program to acquire additional right-of-way and make improvements along these freeway segments. Because implementation of improvements and establishment of a proportionate share funding program by Caltrans cannot be guaranteed, the resulting impacts are significant and unavoidable.

Mitigation Measure TRAF-34: I-105 eastbound (West of I-710, East of Harris Ave). Prior to issuance of a grading permit, each project applicant shall determine their project's proportionate share funding of acquiring additional right-of-way and implementing additional improvements at this freeway location through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and Caltrans. The proportionate share funding of the additional right-of-way acquisition and improvement to improve the PM peak hour level of service shall be provided by the project applicant if Caltrans has established a proportionate share funding mechanism for the improvement at this intersection.

Mitigation Measure TRAF-35: I-105 westbound (West of I-710, East of Harris Ave). Prior to issuance of a grading permit, each project applicant shall determine their project's proportionate share funding of acquiring additional right-of-way and implementing additional improvements at this freeway location through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and Caltrans. The proportionate share funding of the additional right-of-way acquisition and improvement to improve the AM and PM peak hour levels of service shall be provided by the project applicant if Caltrans has established a proportionate share funding mechanism for the improvement at this intersection.

Mitigation Measure TRAF-36: I-105 eastbound (East of Bellflower Blvd. West of I-605). Prior to issuance of a grading permit, each project applicant shall determine their project's proportionate share funding of acquiring additional right-of-way and implementing additional improvements at this freeway location through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and Caltrans. The proportionate share funding of the additional right-of-way acquisition and improvement to improve the PM peak hour level of service shall be provided by the project applicant if Caltrans has established a proportionate share funding mechanism for the improvement at this intersection.

Mitigation Measure TRAF-37: I-105 westbound (East of Bellflower Blvd. West of I-605). Prior to issuance of a grading permit, each project applicant shall determine their project's proportionate share funding of acquiring additional right-of-way and implementing additional improvements at this freeway location through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and Caltrans. The proportionate share funding of the additional right-of-way acquisition and improvement to improve the AM and PM peak hour levels of service shall be provided by the project applicant if Caltrans has established a proportionate share funding mechanism for the improvement at this intersection.

Findings

The Commission finds that the above mitigation measures are feasible, are adopted, and reduce the potentially significant transportation and circulation impacts of the proposed Specific Plan to less-than-significant levels at seven intersections within unincorporated Los Angeles County. Accordingly, the Commission finds that, pursuant to Public Resources Code Section 21081, subdivision (a)(1), and CEQA Guidelines Section 15091, subdivision (a)(1), changes or alterations have been required in, or incorporated into, the proposed Specific Plan, which mitigate or avoid all potentially significant transportation and circulation impacts of the proposed Specific Plan as identified in the Final EIR at these seven intersections.

The Commission further finds that the above mitigation measures are feasible, are adopted, and would, if implemented, substantially lessen the transportation and traffic impacts attributable to the proposed Specific Plan at five intersections within unincorporated Los Angeles County, 9 intersections within the City of

Compton, one intersection within the City of Lynwood, six intersections within the City of Los Angeles, four freeway segments, one freeway off-ramp, and four CMP freeway segments. Pursuant to Public Resources Code Section 21081, subdivision (a)(1), changes or alterations have been required in, or incorporated into, the proposed Specific Plan which would mitigate, in part, the significant transportation and traffic impacts attributable to the proposed Specific Plan, as identified in the Final EIR. The Commission finds that mitigation measures have been established to address impacts at locations outside of County jurisdiction, the County cannot guarantee that implementation of such mitigation measures would occur prior to significance thresholds being exceeded or that or that the jurisdictions within which proposed Specific Plan-related impacts would occur would, in fact, establish proportionate share funding programs to provide improvements. Thus, the Commission finds that there are no feasible mitigation measures that would reduce identified significant impacts to a level below significant at these locations. Therefore, these impacts must be considered unavoidably significant. Pursuant to Public Resources Code Section 21081, subdivision (a)(3), as described in the Statement of Overriding Considerations, the Commission has determined that specific economic, legal, social, technological, or other considerations make infeasible the alternatives identified in the EIR, and the identified air quality impacts are thereby acceptable because of specific overriding considerations (*see Section 6.0*, below), which outweigh the significant unavoidable air quality impacts of the proposed Specific Plan.

3.0 FINDINGS ON SIGNIFICANT BUT MITIGATED IMPACTS

This section identifies significant adverse impacts of the proposed Specific Plan to noise and vibration add utilities and service systems that require findings to be made under Public Resources Code Section 21081 and CEQA Guidelines Section 15091. On the basis of information in the Final EIR, the Commission finds that, based upon substantial evidence in the record, adoption of the mitigation measures set forth below will reduce the identified significant impacts to less-than-significant levels.

3.1 NOISE AND VIBRATION

3.1.1 Noise

The construction activities for each new site-specific development project that would occur within the proposed Specific Plan area would expose nearby existing uses to increased noise levels. Because the Specific Plan would increase densities within the Specific Plan area, construction of new developments could be located less than 50 feet from a sensitive receptor, such as existing residential units. Consequently, construction that occurs immediately adjacent to these existing offsite receptors would generate noise levels that would be substantially greater than the existing noise levels at these receptor locations. Based on the project construction noise levels for general outdoor construction activities and specific construction equipment, construction noise levels at adjacent receptors located off of a specific construction site and located within 50 feet of an existing residential, commercial, or mixed-use development could reach up to 89 dBA L_{eq} or above on an intermittent basis.

Traffic noise levels are anticipated to exceed the County's normally acceptable compatibility standards along 7 roadway segments within the Specific Plan area. Therefore, implementation of the proposed project could result in significant noise impacts at the land use receptors within the Specific Plan area.

Additionally, the Metro passenger trains and the Union Pacific freight trains that run through the Specific Plan area on a daily basis are also a major noise source. The existing day-night average noise level at 75 feet from operations along the Blue Line and along the Union Pacific tracks is 65 dBA Ldn and the combined noise level from operations along both tracks is 68 dBA Ldn. Because rail operations along both the Blue Line and Union Pacific tracks would not change as a result of the proposed project, no change in noise levels is expected from operations on either track.

However, as residential developments under the Specific Plan are proposed adjacent to, and in the immediate vicinity of the Metro rail line or Union Pacific rail tracks (i.e., closer than 75 feet), the noise generated by trains traveling through the Specific Plan area daily would result in noise levels of up to 68 dBA Ldn at 75 feet. If new residential uses are proposed adjacent to the rail lines and potentially exposed to rail noise exceeding 65 dBA Ldn for multiple family residential uses or 60 dBA Ldn for single family residential uses, the new residential uses could experience significant noise impacts.

Mitigation Measures

The Commission finds that, based on substantial evidence in the record, potentially significant noise impacts of the proposed Specific Plan are reduced to less-than-significant levels by implementation of the following mitigation measures:

Mitigation Measure NOI-1: Prior to the issuance of building permits, exterior areas of proposed single family and multiple family residential uses that are projected to be exposed to existing with project roadway noise levels and cumulative with project roadway noise levels exceeding the County's exterior noise standards (i.e., 60 dBA CNEL for single family residential and 65 dBA CNEL for multiple family residential) shall include noise attenuation features including, but not limited to, setbacks, sound walls, glass noise barriers, and landscaping so that exterior areas meet the County's exterior noise standards. To ensure that the County's exterior noise standards are met, the project applicant shall demonstrate compliance through the preparation of an acoustical evaluation.

Mitigation Measure NOI-2: Prior to the issuance of building permits, proposed residential developments adjacent to the Blue line and Union Pacific rail line that are exposed to rail noise of greater than 60 dBA CNEL for single family residential uses and 65 dBA CNEL for exterior areas of multiple family residential uses shall include noise attenuation features including, but not limited to, setbacks, sound walls, glass noise barriers, and landscaping so that exterior areas meet the County's exterior noise standards. To ensure that the County's exterior noise standards are met, the project applicant shall demonstrate compliance through the preparation of an acoustical evaluation.

Findings

The Commission finds that the above mitigation measures are feasible, are adopted, and reduce the potentially significant noise impacts of the proposed Specific Plan to less-than-significant levels. Accordingly, the Commission finds that, pursuant to Public Resources Code Section 21081, subdivision (a)(1), and CEQA Guidelines Section 15091, subdivision (a)(1), changes or alterations have been required in, or incorporated into, the proposed Specific Plan, which mitigate or avoid all potentially significant noise impacts of the proposed Specific Plan as identified in the Final EIR.

3.1.2 Vibration

Construction activities for individual development projects that would occur within the Specific Plan area would include demolition and grading activities, which would have the potential to generate low levels of groundborne vibration. Persons residing and working in close proximity to a construction site could be exposed to the generation of excessive groundborne vibration or groundborne noise levels related to construction activities. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels. Site ground vibrations from construction activities very rarely reach the levels that can damage structures, but they can be perceived in the audible range and be felt in buildings very close to a construction site.

Because the Specific Plan area contains existing land uses, it is anticipated that some existing adjacent uses could be located 50 feet or less from a construction site. Consequently, receptors that are located immediately adjacent to a construction site could be exposed to excessive groundborne vibration levels. Based on the vibration source levels shown in Table 3.9-16, adjacent receptors that are located less than 50 feet from a construction site could be exposed to peak vibration levels of above 0.031 PPV and 78 VdB during construction that does not include pile driving equipment.

As individual development projects would be spread over the Specific Plan's 20-year build out period and construction events are short-term in nature, it is anticipated that there would be an infrequent amount of vibration events at sensitive land use receptors. However, depending on how close an actual receptor location is to a construction site, the type of construction equipment and the type of receptor building (non-engineered timber and masonry building, history-age building, etc.), the vibration levels at a receptor location could exceed the vibration threshold for structural damage (i.e., 0.2 PPV for non-engineered timber and masonry building and 0.12 for historic-age buildings that are extremely susceptible to vibration damage), as well as, the vibration threshold for human annoyance (i.e., 78 VdB for daytime residential areas and 72 VdB for nighttime residential areas).

Daytime human annoyance and structure damage thresholds would not be exceeded by existing rail operations and the potential impact would be less than significant. However, proposed residential uses within the Specific Plan that are planned to be located in close proximity to the rail tracks could be exposed to vibration levels that exceed the nighttime human annoyance threshold of 72 VdB (0.016 in/sec PPV) from the trains traveling through the Specific Plan area. These nighttime vibration impacts would be potentially significant.

Mitigation Measures

The Commission finds that, based on substantial evidence in the record, potentially significant vibration impacts of the proposed Specific Plan are reduced to less-than-significant levels by implementation of the following mitigation measures:

Mitigation Measure NOI-3: Prior to approval of a grading permit or building permit, construction equipment shall be prohibited within 50 feet of occupied residential structures. If construction equipment is required to be within 50 feet of occupied residential structures, the project applicant shall demonstrate

that the human annoyance threshold of 78 VdB (0.032 in/sec PPV) and structural damage thresholds of 0.2 in/sec PPV for non-engineered timber and masonry buildings and 0.12 in/sec PPV for historic-age buildings that are extremely susceptible to vibration damage is achieved. Demonstration of compliance shall be provided through the preparation of a vibration analysis.

Mitigation Measure NOI-4: Prior to the issuance of a building permit for a residential development within 100 feet of the rail tracks, the project applicant shall demonstrate that nighttime vibration level at the proposed residential uses shall not exceed the 72 VdB (0.016 in/sec PPV) threshold for human annoyance.

Findings

The Commission finds that the above mitigation measures are feasible, are adopted, and reduce the potentially significant vibration impacts of the proposed Specific Plan to less-than-significant levels. Accordingly, the Commission finds that, pursuant to Public Resources Code Section 21081, subdivision (a)(1), and CEQA Guidelines Section 15091, subdivision (a)(1), changes or alterations have been required in, or incorporated into, the proposed Specific Plan, which mitigate or avoid all potentially significant vibration impacts of the proposed Specific Plan as identified in the Final EIR.

3.2 UTILITIES AND SERVICE SYSTEMS: WASTEWATER FACILITIES

The proposed Specific Plan would not increase wastewater generation such that the existing capacity at Joint Water Pollution Control Plant (JWPCP) in Carson would be exceeded, and would, therefore, not require the construction or expansion of existing wastewater treatment facilities, which could cause significant environmental effects. An evaluation of the projected wastewater flow from the proposed land uses to existing sewer trunk sewers within the Specific Plan area determined that wastewater generated by proposed land uses in the northern and central portions of the Specific Plan area would exceed existing capacities in the trunk sewers along Wilmington Avenue and Mona Boulevard in the northern portions of the Specific Plan area, and along Willowbrook Avenue in the central portion of the Specific Plan area. Therefore, the implementation of the Specific Plan would result in the need to upgrade the existing trunk sewers which could cause significant environmental effects associated with air quality and greenhouse gas emissions, noise and traffic safety during construction activities.

Mitigation Measures

The Commission finds that, based on substantial evidence in the record, potentially significant wastewater facilities impacts of the proposed Specific Plan are reduced to less-than-significant levels by implementation of the following mitigation measure:

Mitigation Measure USS-1: Prior to the issuance of a building permit, the individual project applicants shall submit a sewer study that confirms that the existing trunk sewers have adequate capacity to accommodate the projected wastewater flow from the proposed individual project as well as cumulative projects. If the projected wastewater flow exceeds the existing sewer capacity, the sewer trunk(s) shall be upgraded to accommodate the projected wastewater. Construction activities shall use best management practices to reduce (1) noise levels and limit construction in accordance with the County Code, (2) air quality and greenhouse gas emissions in accordance with the thresholds identified by the South Coast Air

Quality Management District (see Section 3.2, Air Quality and Section 3.5, Greenhouse Gas Emissions in this EIR) and (3) traffic safety issues through the implementation of a traffic control plan that includes features such as signage, land closures, flaggers, detours and notifications to surrounding property owners.

Findings

The Commission finds that the above mitigation measures are feasible, are adopted, and reduce the potentially significant wastewater facilities impacts of the proposed Specific Plan to less-than-significant levels. Accordingly, the Commission finds that, pursuant to Public Resources Code Section 21081, subdivision (a)(1), and CEQA Guidelines Section 15091, subdivision (a)(1), changes or alterations have been required in, or incorporated into, the proposed Specific Plan, which mitigate or avoid all potentially significant wastewater infrastructure impacts of the proposed Specific Plan as identified in the Final EIR.

4.0 FINDINGS ON LESS THAN SIGNIFICANT IMPACTS

The Commission finds that, based on substantial evidence in the record, the following impacts associated with the proposed Specific Plan are not significant at the project- and cumulative-levels. Accordingly, changes or alterations to the proposed Specific Plan are neither required nor incorporated, pursuant to Public Resources Code Section 21081, subdivision (a)(1), and CEQA Guidelines Section 15091, subdivision (a)(1). Similarly, no mitigation is required pursuant to CEQA Guidelines Section 15126.4, subdivision (a)(3).

<i>Environmental Resource Category</i>	<i>Environmental Impact</i>
<i>Aesthetics</i>	<ul style="list-style-type: none"> • No potentially significant impacts to scenic vistas; • No potentially significant impacts related to views from regional riding or hiking trails; • No potentially significant impacts to scenic resources within a locally designated scenic highway; • No potentially significant impact to the existing visual character or quality of the County's Planning Area; and • No creation of a new source of substantial light or glare that would potentially affect day or nighttime views in the area.
<i>Agricultural Resources</i>	<ul style="list-style-type: none"> • No conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. • No conflict with existing zoning with existing zoning for agricultural use, with a designated Agricultural Opportunity Area, or with a Williamson Act contract. • No conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code § 12220 (g)), timberland (as defined in Public Resources Code § 4526), or timberland zoned Timberland Production (as defined in Government Code § 51104(g)). • No other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.
<i>Air Quality</i>	<ul style="list-style-type: none"> • No potentially significant effects related to creation of objectionable odors affecting a substantial number of people.

<i>Environmental Resource Category</i>	<i>Environmental Impact</i>
<i>Biological Resources</i>	<ul style="list-style-type: none"> • No potentially substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS). • No potentially significant adverse effect on any sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, non-jurisdictional wetlands) identified in local or regional plans, policies, regulations or by CDFW or USFWS. • No potentially significant effect on federally-protected wetlands as defined by Section 404 of the Clean Water Act. • No potentially significant adverse effect on the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. • No conversion of oak woodlands (as defined by the state, oak woodlands are oak stands with greater than 10% canopy cover with oaks at least 5 inches in diameter measured at 4.5 feet above mean natural grade) or otherwise contain oak or other unique native trees (junipers, Joshuas, southern California black walnut, etc.). • No potentially significant conflict with local policies or ordinances protecting biological resources. • No potentially significant conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state Habitat Conservation Plan.
<i>Energy Resources</i>	<ul style="list-style-type: none"> • No conflict with Los Angeles County Green Building Ordinance (L.A. County Code Title 22, Ch. 22.52, Part 20 and Title 21, § 21.24.440) or Drought Tolerant Landscaping Ordinance (L.A. County Code, Title 21, § 21.24.430 and Title 22, Ch. 22.52, Part 21). • No potentially significant effects related to the inefficient use of energy resources.
<i>Geology and Soils</i>	<ul style="list-style-type: none"> • No potentially significant effects related to rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map. • No potentially significant landslide impacts. • No potentially significant impacts related to development on expansive soil. • No potentially significant subsidence impacts. • No potentially significant impacts attributable to expansive soils. • No potentially significant impacts attributable to the placement of septic tanks or alternative wastewater disposal systems on soils that cannot support such infrastructure. • No conflict with the Hillside Management Area Ordinance or hillside design standards in the County General Plan Conservation and Open Space Element.
<i>Greenhouse Gas Emissions</i>	<ul style="list-style-type: none"> • No conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions.
<i>Hazards and Hazardous Materials</i>	<ul style="list-style-type: none"> • No potentially significant hazard to the public or environment through the routine transport, use or disposal of hazardous materials.

<i>Environmental Resource Category</i>	<i>Environmental Impact</i>
	<ul style="list-style-type: none"> • No potentially significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials. • No potentially significant hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. • No potentially significant hazard to the public or environment attributable to a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5. • No potentially significant safety hazards for people residing or working in the vicinity of a public use airport. • No potentially significant safety hazards for people residing or working in the vicinity of private airstrips. • No potentially significant impairment of or interference with an adopted emergency response plan or emergency evacuation plan. • No potentially significant exposure of people or structures to a significant risk of loss, injury or death involving wildland fires.
<i>Hydrology and Water Quality</i>	<ul style="list-style-type: none"> • No potentially significant impact attributable to substantially altering the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. • No conflict with the Los Angeles County Low Impact Development Ordinance (L.A. County Code, Title 12, Ch. 12.84 and Title 22, Ch. 22.52). • No potentially significant impact attributable to point or nonpoint source pollutant discharges into State Water Resources Control Board-designated Areas of Special Biological Significance. • No potentially significant impact attributable to use of onsite wastewater treatment systems in areas with known geological limitations (e.g. high groundwater) or in close proximity to surface water (including, but not limited to, streams, lakes, and drainage course). • No potentially significant impact attributable to housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, or within a floodway or floodplain. • No potentially significant impact attributable to placement of structures, which would impede or redirect flood flows, within a 100-year flood hazard area, floodway, or floodplain. • No potentially significant impact attributable to placement of structures in areas subject to inundation by seiche, tsunami, or mudflow. • No potentially significant impact attributable to the exposure of people or structures to a significant risk of loss, injury or death involving flooding as a result of the failure of a levee or dam.
<i>Land Use and Planning</i>	<ul style="list-style-type: none"> • No physical division of an established community due to future development; • No conflict with Hillside Management criteria, Significant Ecological Areas conformance criteria, or other applicable land use criteria. • No conflict with the Southern California Association of Governments' Regional Transportation Plan Goals and Policies and Compass/Growth Visioning Principles;

<i>Environmental Resource Category</i>	<i>Environmental Impact</i>
	<ul style="list-style-type: none"> No conflict with an applicable habitat conservation plan or natural community conservation plan.
<i>Mineral Resources</i>	<ul style="list-style-type: none"> No potentially significant impact due to the loss of availability of mineral resources; No potentially significant impact due to 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.
<i>Population and Housing</i>	<ul style="list-style-type: none"> No potentially significant impact due to the displacement of substantial numbers of existing housing, thereby necessitating the construction of replacement housing elsewhere. No potentially significant impact due to the displacement of substantial numbers of people, thereby necessitating the construction of replacement housing elsewhere.
<i>Public Services and Recreation</i>	<ul style="list-style-type: none"> No potentially significant impact due to interference with regional open space connectivity.
<i>Transportation and Traffic</i>	<ul style="list-style-type: none"> No significant impacts on CMP arterial segments. No significant impacts on transit facilities. No change in air traffic patterns. No substantial increase in hazards due to a roadway design feature or the allowance of incompatible uses. No inadequate emergency access. No conflict with adopted policies, plans, or programs supporting alternative transportation. No creation of a hazard or barrier for pedestrians or bicyclists.
<i>Utilities and Service Systems</i>	<ul style="list-style-type: none"> No significant impact due to violation of applicable wastewater treatment standards. No significant impacts due to construction of water facilities. No significant impacts due to construction of stormwater drainage facilities. No significant impacts related to availability of water supply. No significant impacts use to availability of landfill capacity or compliance with applicable solid waste disposal and diversion requirements.
<i>Other Environmental Changes</i>	<ul style="list-style-type: none"> No significant irreversible commitment of resources, irreversible environmental changes, or environmental damage from accidents.
<i>Growth-Inducing Impacts</i>	<ul style="list-style-type: none"> No significant impacts related to growth inducement.

5.0 FEASIBILITY OF PROJECT ALTERNATIVES

The Final EIR concluded that the proposed Specific Plan would result in significant unavoidable impacts relating to air quality, cultural resources, greenhouse gas emissions, and transportation and traffic. Based on considerations of avoiding or substantially lessening these unavoidable significant impacts, as well as consideration of the basic proposed Specific Plan objectives and public comments, the following alternatives to the proposed Specific Plan were identified:

- Alternative 1: No Project/Development in Accordance with Existing Zoning.

- Alternative 2: Modified Land Use along 119th Street.
- Alternative 3: Reduced MLK Tier 2 Development Set Forth in MLK Medical Center Campus EIR.
- Alternative 4: Construct All Physical Traffic Measures Set Forth in MLK Medical Center Campus EIR.

Based on the analysis presented in the EIR, the environmentally superior alternative is Alternative 3, Reduced MLK Tier 2 Development Set Forth in MLK Medical Center Campus EIR. While this alternative would lessen the project's significant environmental impacts, it would not reduce them to a less-than-significant level. This Alternative would meet most of the objectives of providing a transit-oriented development in the project area and providing an attractive environment for pedestrian, bicyclists, Metro riders, and local transit users through streetscape improvements. This Alternative would only partially meet the objective of revitalizing health care services at MLK with the reduced improvements at MLK.

5.1 ALTERNATIVE 1: NO PROJECT/DEVELOPMENT IN ACCORDANCE WITH EXISTING ZONING

The No Project/Development in Accordance with Existing Zoning alternative would result in the development of the project area up to 80 percent of the development allowed under existing zoning.

Compared to the proposed project, impacts associated with light and glare, air quality, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, population and housing, noise, schools, transportation facilities and utilities would be less than for the proposed Specific Plan. Impacts related to the Air Quality Management Plan (AQMP), regional construction CO emissions would be substantially reduced from significant and unavoidable under the proposed project to no impact (AQMP) and to less than significant impact (regional CO emissions) under this Alternative. Compared to the proposed project, this Alternative would result in greater impacts to land use policies that provide for TOD opportunities and less dependence of the automobile, provision of pedestrian and bicycle circulation patterns and cohesive future development. This Alternative would result in the same no impacts related to scenic vista, division of an established community, public services, and existing wastewater treatment plants.

This Alternative would not meet the objectives of providing a transit-oriented development in the project area and providing an attractive environment for pedestrian, bicyclists, Metro riders, and local transit users through streetscape improvements because these improvements would not be comprehensively and cohesively implemented in accordance with a uniform design guideline such as the proposed Specific Plan.

5.2 ALTERNATIVE 2: MODIFIED LAND USE ALONG 119TH STREET

Development under this alternative would result in the implementation of Mixed Use 1 zoning on the south side of E. 119th Street between S. Wilmington Avenue to W. Willowbrook Avenue. This would result in 47 more residential units and 49,555 square feet of additional non-residential uses compared to the proposed project.

Compared to the proposed project, impacts associated with light and glare, air quality, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use plans, policies and ordinances, population and housing, noise, schools, transportation facilities and

utilities would result in greater impacts. This Alternative would result in no impacts related to scenic vista, division of an established community, public services, and existing wastewater treatment plants.

The implementation of this Alternative would result in slightly greater environmental impacts compared to the proposed project. This Alternative would meet all of the objectives of the proposed project including the provision of a transit-oriented development in the project area and provision of an attractive environment for pedestrian, bicyclists, Metro riders, and local transit users through streetscape improvements.

5.3 ALTERNATIVE 3: REDUCED MLK TIER 2 DEVELOPMENT SET FORTH IN MLK MEDICAL CENTER CAMPUS EIR

This reduced development alternative includes the same land uses as the proposed project, except for the MLK Hospital Center. This alternative includes a 50 percent reduction in non-residential square footage compared to the uses approved as part of the Tier 2 development set forth in the MLK Medical Center Campus EIR. This alternative includes the development of 832,348 square feet of MLK Hospital uses compared to the 1,248,522 square feet of MLK Hospital uses currently proposed as part of the Specific Plan. Therefore, development under this alternative would result in net increases of 1,952 residential units and 2,249,862 square feet of non-residential uses. In comparison to the proposed Specific Plan, this alternative would result in the same number of residential units and 416,174 square feet of fewer non-residential uses.

Compared to the proposed project, impacts associated with light and glare, air quality, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use plans and policies, population and housing, noise, transportation facilities and utilities would be less than for the proposed project. This Alternative would result in the same related to scenic vista, division of an established community, public services, and existing wastewater treatment plants.

The implementation of this Alternative would result in less environmental impacts compared to the proposed project. This Alternative would meet most of the objectives of providing a transit-oriented development in the project area and providing an attractive environment for pedestrian, bicyclists, Metro riders, and local transit users through streetscape improvements. This Alternative would partially meet the objective of revitalizing health care services at MLK with the reduced improvements at MLK.

5.1.4 ALTERNATIVE 4: CONSTRUCT ALL PHYSICAL TRAFFIC MEASURES SET FORTH IN MLK MEDICAL CENTER CAMPUS EIR

This alternative includes the implementation of all the physical traffic improvements proposed as mitigation measures as set forth on the MLK Medical Center Campus EIR. Not all of these improvements were included in the proposed Specific Plan improvements because roadway widenings were considered generally not feasible due to the lack of available right-of-way because of existing buildings or lack of control over adjacent right-of-way, or because of inconsistency with Specific Plan goals and objectives; lane re-striping was considered to be feasible if they would not result in inadequate lane widths; and signal/phasing changes were considered to be feasible as long as they would improve and not worsen intersection operations or potentially cause other problems and/or impacts elsewhere. The improvements are part of this alternative, and not included in the proposed Specific Plan:

- **I-105 / Imperial Highway:** Provide a third northbound, left-turn lane by widening off-ramp by 10 feet for approximately 150 to 200 feet.
- **Wilmington Avenue / I-105 Eastbound Ramps:** Provide an additional eastbound lane by widening (reducing the raised median on the ramp) the off-ramp. The eastbound approach shall have a left-turn lane, shared left-right turn lane, and a separate right-turn lane. The sidewalks on both sides of Wilmington Avenue (as noted above) shall be reduced by 2 feet and the Wilmington Avenue roadway shall be widened by 2 feet on both sides (a total of 4 feet) from the south leg of this intersection. Provide an additional northbound left-turn lane by widening (reducing the medians).
- **Wilmington Avenue / 118th Street:** Widen Wilmington Avenue roadway by 2 feet on both sides and re-stripe to provide two through lanes, a shared through right-turn lane and dual left-turn lanes along the southbound approach. Restripe the westbound approach to provide a separate right-turn lane and a shared left through lane. Northbound approach shall have the same lane geometry as existing conditions.
- **Wilmington Avenue / 120th Street–119th Street:** Widen Wilmington Avenue roadway by 2 feet on both sides and restripe the southbound approach to provide a separate right-turn lane, three through lanes, and a left-turn lane.

Re-stripe northbound approach to provide a shared through-right turn lane, two through lanes, and a left-turn lane. Remove median adjacent to northbound approach to facilitate three southbound receiving lanes. Restrict parking along Wilmington Avenue roadway during morning and evening peak periods along the eastside of Wilmington between 120th Street and Martin Luther King, Jr. (MLK) Community Hospital Driveway entrance.

Widen 120th Street west of Wilmington Avenue for 250 feet, on the south side by 2 feet, and re-stripe the eastbound approach to provide a separate right-turn lane, dual left-turn lanes, and a through lane. The westbound approach of 119th Street would have the same lane geometry as existing conditions.

- **Wilmington Avenue / Martin Luther King, Jr. Community Hospital Entrance–120th Street, County of Los Angeles:** Re-stripe southbound approach to provide a separate right-turn lane, two through lanes, and a left-turn lane. Provide three northbound receiving lanes and restrict on-street curb parking along the eastside of Wilmington Avenue between Martin Luther King, Jr. Community Hospital Driveway and 120th Street and 120th Street and 119th Street during morning and evening peak hours. Remove the median within the hospital entrance and re-stripe the driveway to provide dual left-turn lanes, a through lane, and a separate right-turn lane along the eastbound approach. Re-stripe to provide one receiving lane.

Compared to the proposed project, impacts associated with scenic vistas, light and glare, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use plans and policies, population and housing, public services, and utilities would result in the same impacts. Due to the implementation of street improvements to accommodate vehicular traffic, less pedestrian and bicycle improvements would be implemented under this Alternative compared to the proposed project. With less pedestrian and bicycle improvements, fewer residents and employees would be encouraged to use alternative means of transportation compared to the automobile. Therefore, slightly greater vehicle trips would occur under this alternative and would result in greater air quality, greenhouse gas and noise impacts as well as impacts on transportation facilities outside of the Specific Plan. Overall, this alternative would result in more environmental impacts compared to the proposed project.

This Alternative would meet the majority of the project objectives; however, it would not meet the objective to provide an attractive environment for pedestrian and bicyclists through streetscape improvements because some of these improvements cannot occur in favor of street improvement to accommodate motor vehicles.

Table 1 provides a summary comparison, by individual issue area, for each alternative to the project.

**TABLE 4-1
ALTERNATIVES COMPARISON**

Environmental Issue	Proposed Project	Alternative 1: No Project/ Development in Accordance with Existing Zoning	Alternative 2: Modified Land Use Along 119th St.	Alternative 3: Reduced MLK Tier 2 Development Set Forth in MLK Medical Center Campus EIR	Alternative 4: Construct All Physical Traffic Measures Set Forth in MLK Medical Center Campus EIR
Aesthetics					
Scenic Vista	NI	NI (E)	NI (E)	NI (E)	NI (E)
Light and Glare	LS	LS (L)	LS (G)	LS (L)	LS (E)
Air Quality					
Air Quality Plan	SU	SU (L)	SU (G)	SU (L)	SU (E)
Air Quality Standards/Violations					
Regional Construction CO Emissions	SU	LS (L)	SU (G)	LS (L)	SU (G)
Regional Construction ROG and NOx Emissions	SU	SU (L)	SU (G)	SU (L)	SU (G)
Regional Operational ROG, NO _x , CO, PM ₁₀ , and PM _{2.5} Emissions	SU	SU (L)	SU (G)	SU (L)	SU (G)
Localized Construction Emissions	SU	SU (L)	SU (G)	SU (L)	SU (G)
Localized Operational Emissions	LS	LS (L)	LS (G)	LS (L)	LS (G)
Criteria Pollutant	SU	SU (L)	SU (G)	SU (L)	SU (G)
Sensitive Receptors	LSM	LSM (L)	LSM (G)	LSM (L)	LSM (G)
Cultural Resources					
Historical Resources	SU	SU (L)	SU (G)	SU (L)	SU (E)
Archaeological Resources	LSM	LSM (L)	LSM (G)	LSM (L)	LSM (E)
Paleontological Resources	LSM	LSM (L)	LSM (G)	LSM (L)	LSM (E)
Human Remains	LSM	LSM (L)	LSM (G)	LSM (L)	LSM (E)
Tribal Cultural Resources	LSM	LSM (L)	LSM (G)	LSM (L)	LSM (E)

Environmental Issue	Proposed Project	Alternative 1: No Project/ Development in Accordance with Existing Zoning	Alternative 2: Modified Land Use Along 119th St.	Alternative 3: Reduced MLK Tier 2 Development Set Forth in MLK Medical Center Campus EIR	Alternative 4: Construct All Physical Traffic Measures Set Forth in MLK Medical Center Campus EIR
Geology and Soils					
Strong Seismic Ground Shaking	LS	LS (L)	LS (G)	LS (L)	LS (E)
Liquefaction and Lateral Spreading	LS	LS (L)	LS (G)	LS (L)	LS (E)
Soil Erosion or Topsoil Loss	LS	LS (L)	LS (G)	LS (L)	LS (E)
Geologic Instability	LS	LS (L)	LS (G)	LS (L)	LS (E)
Greenhouse Gases					
Greenhouse Gas Emissions	SU	LS (L)	SU (G)	LS (L)	SU (G)
Conflict with Plan, Policy, or Regulation that Reduces Greenhouse Gas Emissions	LS	LS (L)	LS (G)	LS (L)	LS (G)
Hazards and Hazardous Materials					
Accident Conditions	LS	LS (L)	LS (G)	LS (L)	LS (E)
Schools	LS	LS (L)	LS (G)	LS (L)	LS (E)
Hazardous Materials Site Listing	LS	LS (L)	LS (G)	LS (L)	LS (E)
Hydrology and Water Quality					
Water Quality Standards/Waste Discharge Requirements	LS	LS (L)	LS (G)	LS (L)	LS (E)
Groundwater Supplies and Recharge	LS	LS (L)	LS (G)	LS (L)	LS (E)
Erosion/Siltation	LS	LS (L)	LS (G)	LS (L)	LS (E)
Stormwater Drainage Capacity	LS	LS (L)	LS (G)	LS (L)	LS (E)
Surface Water and Groundwater Quality	LS	LS (L)	LS (G)	LS (L)	LS (E)
Degrade Water Quality	LS	LS (L)	LS (G)	LS (L)	LS (E)

Environmental Issue	Proposed Project	Alternative 1: No Project/ Development in Accordance with Existing Zoning	Alternative 2: Modified Land Use Along 119 th St.	Alternative 3: Reduced MLK Tier 2 Development Set Forth in MLK Medical Center Campus EIR	Alternative 4: Construct All Physical Traffic Measures Set Forth in MLK Medical Center Campus EIR
Land Use and Planning					
Divide an Established Community	NI	NI (E)	NI (E)	NI (E)	NI (E)
Conflict with Applicable Plans, Policies, or Regulations	LS	SM (G)	LS (G)	LS (L)	LS (E)
Conflict with County Zoning Ordinance	LS	NI (L)	LS (G)	NI (L)	LS (E)
Visual Character	LS	LS (G)	LS (G)	LS (L)	LS (E)
Noise and Vibration					
Noise Levels in Excess of Standards	LSM	LSM (L)	LSM (G)	LSM (L)	LSM (E)
Excessive Ground-Borne Vibration	LSM	LSM (L)	LSM (G)	LSM (L)	LSM (E)
Permanent Increase in Ambient Noise Levels	LS	LS (L)	LS (G)	LS (L)	LS (E)
Temporary or Periodic Increase in Ambient Noise Levels	LS	LS (L)	LS (G)	LS (L)	LS (E)
Population and Housing					
Population Growth	LS	LS (L)	LS (G)	LS (L)	LS (E)
Public Services and Recreation					
Fire Protection Services	NI	NI (E)	NI (E)	NI (E)	NI (E)
Police Protection Services	NI	NI (E)	NI (E)	NI (E)	NI (E)
School Facilities	LS	LS (L)	LS (G)	LS (E)	LS (E)
Parks	NI	NI (E)	NI (E)	NI (E)	NI (E)
Library Facilities	NI	NI (E)	NI (E)	NI (E)	NI (E)
Other Public Facilities	NI	NI (E)	NI (E)	NI (E)	NI (E)
Increase Use of Recreational Facilities	LS	LS (L)	LS (G)	LS (E)	LS (E)
Recreational Facilities Physical Effect on the Environment	NI	NI (E)	NI (E)	NI (E)	NI (E)
Transportation and Traffic					
Traffic Increase	SU	SU (L)	SU (G)	SU (L)	SU (L)
Congestion Management Program	SU	SU (L)	SU (G)	SU (L)	SU (L)

Environmental Issue	Proposed Project	Alternative 1: No Project/ Development in Accordance with Existing Zoning	Alternative 2: Modified Land Use Along 119 th St.	Alternative 3: Reduced MLK Tier 2 Development Set Forth in MLK Medical Center Campus EIR	Alternative 4: Construct All Physical Traffic Measures Set Forth in MLK Medical Center Campus EIR
Utilities					
Wastewater Treatment Requirements	LS	LS (L)	LS (G)	LS (L)	LS (E)
Water or Wastewater Treatment Facilities	LSM	LSM (L)	LSM (G)	LSM (L)	LSM (E)
Stormwater Drainage Facilities	LS	LS (L)	LS (G)	LS (L)	LS (E)
Water Supplies	LS	LS (L)	LS (G)	LS (L)	LS (E)
Energy Facilities	LS	LS (L)	LS (G)	LS (L)	LS (E)
Landfill Capacity	LS	LS (L)	LS (G)	LS (L)	LS (E)
Compliance with Solid Waste Regulations and Statutes	LS	LS (L)	LS (G)	LS (L)	LS (E)
NOTES:					
NI = No Impact		(L) = Less than Project			
LS = Less than Significant		(G) = Greater than Project			
LSM = Less than Significant with Mitigation		(E) = Equivalent to Project			
SU = Significant and Unavoidable					

6.0 STATEMENT OF OVERRIDING CONSIDERATIONS

CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological or other benefits of the project against its unavoidable environmental risks when determining whether to approve a project. If the specific economic, legal, social, technological or other benefits of the project outweigh the unavoidable adverse environmental effects, those effects may be considered "acceptable." (CEQA Guidelines, §15093, subd. (a).) CEQA requires the agency to support, in writing, the specific reasons for considering a project acceptable when significant impacts are not avoided or substantially lessened. Those reasons must be based on substantial evidence in the Final EIR or elsewhere in the administrative record. (CEQA Guidelines, §15093, subd. (b).)

In accordance with the requirements of CEQA and the CEQA Guidelines, the Commission finds that the mitigation measures identified in the Final EIR and MMRP, when implemented, will avoid or substantially lessen virtually all of the significant effects identified in the Final EIR for the proposed Specific Plan. However, certain significant impacts of the proposed Specific Plan are unavoidable even after incorporation of all feasible mitigation measures. These significant unavoidable impacts are related to air quality, cultural resources, greenhouse gas emissions, and transportation and traffic. (*See Section 2.0*, above.)

The Commission finds that all feasible mitigation measures identified in the Final EIR that are within the purview of the County will be implemented with the proposed Specific Plan, and that the remaining significant unavoidable effects are outweighed and thus are found to be acceptable due to the following specific overriding economic, legal, social, technological, or other benefits, based upon the facts set forth above, the Final EIR, and the record, as follows:

1. The proposed Specific Plan will provide the residents, landowners, businesses, staff and policy makers, and all stakeholders in the Willowbrook community with a comprehensive, long-range policy guideline for future development that consistent with the General Plan's transit-oriented vision for the community.
2. Coordination between the County of Los Angeles, the Los Angeles County Metropolitan Transportation Authority (Metro), and major existing uses within the community (Martin Luther King, Jr. Medical Center, Charles R. Drew University of Medicine and Science) will facilitate the phased expansion of these uses and development of new use to serve the in a manner that ensures adequate infrastructure required to serve such new development without impacting existing residents.
3. Proposed development and community amenities will help revitalize health care services at Martin Luther King, Jr. Medical Center. Proposed development and community amenities will also help improve services at Charles R. Drew University of Medicine and Science.
4. The transit orientation of new development within walking distance of the Willowbrook/Rosa Parks Station will enhance access to the community, allow for the expansion of housing and economic development opportunities for the Willowbrook community in a manner that minimizes congestion and improves bicycle and pedestrian mobility and safety, as well as access to the Willowbrook/Rosa Parks Station.
5. The proposed Specific Plan will provide an attractive environment for pedestrians, bicyclists, Metro riders, and local transit users through streetscape improvements.

6. The proposed Specific Plan provides for the creation of jobs and economic benefits for current and future residents of the Willowbrook community by designating appropriate areas for commercial, and institutional uses, the designation of which would allow 2.66 million square feet of new commercial, institutional, and public uses in the community that would allow for creation of more than 5,600 new jobs. The proposed Specific Plan further assists job creation by allowing for better access to the community.
7. The proposed Specific Plan will serve as the foundation in making land use decisions based on goals and policies related to land use, transportation routes, population growth and distribution, development, open space, resource preservation and utilization, air and water quality, noise, safety, and other related physical, social, and economic development factors.
8. The proposed Specific Plan will regulate land use development so that the density of residential development and the intensity of non-residential development are appropriate to the property and to surrounding properties and neighborhoods.
9. The proposed Specific Plan includes updated policies that reflect current environmental and planning trends while balancing the rights of property owners to make economically viable use of their property.
10. The proposed Specific Plan allows for an appropriate number of dwelling units, including affordable housing, to be built to ensure that the regional housing needs allocated to the County by the Southern California Association of Governments (“SCAG”) is met.
11. While substantially expanding local housing and employment opportunities, the proposed Specific Plan will preserve the character of the existing residential neighborhoods.
12. On balance, the Commission finds that these overriding considerations, as identified in conjunction with the environmental review of impacts stemming from the proposed Specific Plan, are acceptable when measured against the significant and unavoidable environmental impacts identified in the Final EIR.