

CEQA FINDINGS OF FACT REGARDING THE FINAL ENVIRONMENTAL IMPACT REPORT FOR THE FLORENCE-FIRESTONE TOD SPECIFIC PLAN

STATE CLEARINGHOUSE NO. 2021030300

1.0 BACKGROUND

The California Environmental Quality Act (CEQA) requires that a number of written findings be made by the lead agency in connection with certification of an environmental impact report (EIR) prior to approval of the project pursuant to Sections 15091 and 15093 of the CEQA Guidelines and Section 21081 of the Public Resources Code. This document provides the findings required by CEQA.

2.0 PROJECT SUMMARY

2.1 PROJECT LOCATION

The proposed Florence-Firestone Transit Oriented District (TOD) Specific Plan (FFTOD Specific Plan) Area encompasses the Los Angeles County unincorporated community of Florence-Firestone. The FFTOD Specific Plan Area is approximately 6 miles south of downtown Los Angeles and has an area of 3.48 square miles. The area is bound by the city of Los Angeles to the north, south, and west; the cities of Huntington Park and South Gate as well as the unincorporated community of Walnut Park are to the east. The LA Metro A (Blue) Line connects downtown Los Angeles to Long Beach and has three stations in the FFTOD Specific Plan Area (Slauson, Florence, and Firestone stations). LA Metro operates numerous bus routes in the community. Three freeways (Interstate [I]-110, I-105, I-10) are within a 2.5-mile radius of the community. Existing land uses in the FFTOD Specific Plan Area include low and medium density residential, commercial, light and heavy industrial, mixed uses, parks, and public facilities.

The FFTOD Specific Plan Area boundary is consistent with the Florence-Firestone Community Plan (FFCP) boundary and consistent with the extents of the Florence-Firestone community. Generally, the FFTOD Specific Plan Area is bounded on the north by Slauson Avenue; on the west by S Central Avenue from Slauson Avenue to E 103rd Street; on the east by Wilmington Avenue, Santa Fe Avenue, and S Alameda Street; and on the south by E 103rd Street and E 92nd Street.

2.2 PROJECT DESCRIPTION

The FFTOD Specific Plan would establish transit oriented development policy direction, development standards, and implementation programs for the Florence-Firestone community as

part of the Los Angeles County Transit Oriented District (TOD) Program of the Los Angeles County 2035 General Plan (General Plan). The TOD Program establishes transit oriented districts, defined as the approximately 0.5 mile radius around transit stations, as locations to encourage infill development with pedestrian-friendly and community-serving uses near transit stops. This focused, transit oriented development is intended to increase living and working opportunities near transit and encourage increased walking, bicycling, and transit use. The FFTOD Specific Plan would build from the 2019 FFCP by creating actions to achieve some of the FFCP policies and implement the broader TOD and sustainability goals of Los Angeles County.

California law requires that cities and counties zone land to encourage and facilitate their fair share of housing growth—referred to as the Regional Housing Needs Assessment (RHNA). The FFTOD Specific Plan would provide the opportunity to create new affordable units to accommodate the needs of the residents. The FFTOD Specific Plan would help implement the Housing Element of the General Plan by rezoning parcels identified as housing sites to satisfy the RHNA.

Consistent with these General Plan policies and programs, the FFTOD Specific Plan would implement transit oriented district development by establishing zones that identify permitted land uses and objective development standards such as density, intensity, building height, and setbacks by zone; providing additional design standards such as pedestrian design, building design, open space and landscaping, and parking for all zones; modifying county-wide base zones applicable in Florence-Firestone; and identifying multi-modal improvements to support walking, bicycling, and transit use in balance with private vehicles; and address infrastructure requirements associated with future development.

The FFTOD Specific Plan is a Los Angeles County-initiated, Caltrans Sustainable Communities grant-funded project that is being proposed pursuant to the Los Angeles County General Plan to enhance the transit oriented development pattern, promote active transportation, reduce vehicle miles traveled, and improve the public realm in the Florence-Firestone area by focusing on updates to land use, urban design, and mobility in the Slauson, Florence, and Firestone TOD station areas. In addition, the proposed FFTOD Specific Plan is intended to streamline the approval process for future development projects that are consistent with the FFTOD Specific Plan.

The FFTOD Specific Plan would amend General Plan Land Use designations on parcels in Florence-Firestone to provide consistency with the General Plan policy direction for mixed use parcels along transportation corridors and support RHNA requirements by providing greater opportunity to create new affordable units. The proposed FFTOD Specific Plan would also establish land use development and design standards for features, such as scale and mass, building orientation, building architectural elements, circulation, parking, and exterior lighting. The standards established by this FFTOD Specific Plan are designed to increase the clarity of applicable regulations, support the goals and policies of the Los Angeles County General Plan and FFCP, and support transit oriented development investments in the community.

2.3 PROJECT OBJECTIVES

The project objectives are to:

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

The FFTOD Specific Plan objectives were identified by the TOD Program and the Florence-Firestone Community Plan in collaboration with Caltrans.

2.4 ENVIRONMENTAL REVIEW PROCESS

In conformance with CEQA, the State CEQA Guidelines, and the Los Angeles County (the lead agency for the proposed project) CEQA Guidelines, Los Angeles County conducted an extensive environmental review of the proposed project.

- Los Angeles County issued a Notice of Preparation (NOP) and Initial Study for the proposed project on March 15, 2021. The public review period extended from March 15, 2021 to April 14, 2021.
- Los Angeles County held an online scoping meeting for the proposed project on March 25, 2021 via Zoom.
- Based upon the Initial Study and Environmental Checklist Form, Los Angeles County staff determined that a Draft EIR (Draft EIR) should be prepared for the proposed project. The scope of the Draft EIR was determined based on Los Angeles County's Initial Study, comments received in response to the NOP, and comments received at the scoping meeting conducted by Los Angeles County.
- Los Angeles County prepared a Draft EIR, which was made available for a 45-day public review period beginning September 21, 2021 and ending November 5, 2021.
- Los Angeles County prepared a Final EIR (Final EIR), including the Responses to Comments to the Draft EIR, the Findings of Fact, and the Statement of Overriding Considerations. The Final EIR/Response to Comments contains comments on the Draft EIR, responses to those comments, revisions to the Draft EIR, and appended documents.
- Los Angeles County held public hearings on the proposed project, including a Regional Planning Commission hearing on January 19, 2022, and a County Board of Supervisors Hearing on March 15, 2022.

2.5 RECORD OF PROCEEDINGS

For purposes of CEQA and these Findings, the Record of Proceedings for the proposed project consists of the following documents and other evidence, at a minimum:

- The NOP and all other public notices issued by Los Angeles County in conjunction with the proposed project
- The Final EIR
- The Draft EIR
- All written comments submitted by agencies or members of the public during the public review comment period on the Draft EIR
- All responses to written comments submitted by agencies or members of the public during the public review comment period on the Draft EIR
- The Mitigation Monitoring and Reporting Program
- The reports and technical memoranda included or referenced in the Response to Comments
- All documents, studies, EIRs, or other materials incorporated by reference in the Draft EIR and Final EIR
- The Resolutions adopted by Los Angeles County in connection with the proposed project, and all documents incorporated by reference therein
- Matters of common knowledge to Los Angeles County, including but not limited to federal, state, and local laws and regulations
- Any documents expressly cited in these Findings
- Any other relevant materials required to be in the record of proceedings by Public Resources Code Section 21167.6(e)

2.6 CUSTODIAN AND LOCATION OF RECORDS

The documents and other materials that constitute the administrative record for Los Angeles County's actions related to the proposed project are at the Los Angeles County Department of Regional Planning (DRP), 320 West Temple Street, Room 1356, Los Angeles, CA 90012. The DRP is the custodian of the administrative record for the proposed project. Copies of these documents, which constitute the record of proceedings, are and at all relevant times have been and will be available upon request at the offices of the DRP. This information is provided in compliance with Public Resources Code Section 21081.6(a)(2) and Guidelines Section 15091(e).

3.0 FINDINGS OF FACTS AND OVERRIDING CONSIDERATIONS

Los Angeles County, as lead agency, is required under CEQA to make written findings concerning each alternative and each significant environmental impact identified in the Draft EIR and Final EIR.

Specifically, regarding findings, Guidelines Section 15091 provides:

- (a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:
 - 1. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR.
 - 2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
 - 3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the EIR.
- (b) The findings required by subsection (a) shall be supported by substantial evidence in the record.
- (c) The finding in subdivision (a)(2) shall not be made if the agency making the finding has concurrent jurisdiction with another agency to deal with identified feasible mitigation measures or alternatives. The finding in subsection (a)(3) shall describe the specific reasons for rejecting identified mitigation measures and project alternatives.
- (d) When making the findings required in subdivision (a)(1), the agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures.
- (e) The public agency shall specify the location and custodian of the documents or other material which constitute the record of the proceedings upon which its decision is based.
- (f) A statement made pursuant to Section 15093 does not substitute for the findings required by this section.

The “changes or alterations” referred to in Section 15091(a)(1) may include a wide variety of measures or actions as set forth in Guidelines Section 15370, including:

- (a) Avoiding the impact altogether by not taking a certain action or parts of an action.
- (b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
- (c) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.
- (d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
- (e) Compensating for the impact by replacing or providing substitute resources or environments.

4.0 FINDINGS AND FACTS REGARDING IMPACTS

4.1 IMPACTS DETERMINED NOT TO BE SIGNIFICANT

4.1.1 INITIAL STUDY AND SECTION 5.0, OTHER CEQA CONSIDERATIONS, OF THE DRAFT EIR

The proposed project was found to have either no impact or a less-than-significant impact on the following environmental issue areas, as determined in Section 5.0 Other CEQA Considerations of the Draft EIR and the Initial Study (Appendix A of the Draft EIR). Below is a brief discussion stating the reasons why various possible significant effects of a project were determined not significant and therefore not discussed in detail in Section 3.0 of the Draft EIR.

- **Aesthetics:**

- *The FFTOD Specific Plan would not have a substantial adverse effect on a scenic vista.* There are no designated scenic highways, significant ridgelines, or other identified scenic resources in the FFTOD Specific Plan Area. As a result, impacts to scenic vistas related to implementation of the FFTOD Specific Plan would be less than significant.
- *The FFTOD Specific Plan would not be visible from or obstruct views from a regional riding, hiking, or multi-use trail.* According to the Trails Map by the Los Angeles County Department of Parks and Recreation, no Los Angeles County trails are in the FFTOD Specific Plan Area. Therefore, the project would not be visible or obstruct views from a regional trail, and no impact would occur.
- *The FFTOD Specific Plan would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.* Based on a review of the California Department of Transportation Scenic Highways Program, no state scenic highways are in the FFTOD Specific Plan Area. The closest scenic highway to the FFTOD Specific Plan Area is State Route 2, the Angeles Crest Highway, approximately 20 miles to the north. Therefore, the FFTOD Specific Plan Area is not visible from this highway, and the project would not result in impacts to scenic resources within view of a state scenic highway. The project would not damage scenic resources and no impact would occur.

- **Agriculture and Forestry:**

- *The FFTOD Specific Plan would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use.* According to the California Important Farmland Finder maintained by the California Department of Conservation, the majority of the FFTOD Specific Plan Area is designated as Urban and Built-Up Land. There is an area of Unique Farmland at the southern boundary of the FFTOD Specific Plan Area west of Compton Avenue and south of 91st Street. The FFTOD Specific Plan would include zone changes for existing residential parcels adjacent to this area of Unique Farmland. However, the FFTOD Specific Plan would not convert the Unique Farmland to a nonagricultural use. Therefore, the impact would be less than significant.
- *The FFTOD Specific Plan would not conflict with existing zoning for agricultural use, with a designated Agricultural Resource Area, or with a Williamson Act contract.* There are no existing Williamson Act contracts in this part of Los Angeles County, and there are no designated agricultural resource areas in the FFTOD Specific Plan Area. Therefore, the project would not conflict with existing zoning for agricultural use or a Williamson Act contract. No impact would occur.
- *The FFTOD Specific Plan would not conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220 [g]), timberland (as defined in Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined in Government Code Section 51104[g]).* The FFTOD Specific Plan Area is heavily urbanized with residential and industrial land uses and is not in an area zoned for forest land, timberland, or Timberland Production as defined in Public Resources Code Section 12220(g) and Government Code Section 4526. Therefore, implementation of the project would not conflict with or cause rezoning of forest land or timberland, and no impact would occur.
- *The FFTOD Specific Plan would not result in the loss of forest land or conversion of forest land to nonforest use.* The FFTOD Specific Plan Area is not zoned for forest land, nor does it contain any forests. Therefore, implementation of the project would not result in the loss of forest land or conversion of forest land to nonforest use, and no impact would occur.
- *The FFTOD Specific Plan would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forest land to nonforest use.* Although the FFTOD Specific Plan includes zone changes for existing residential parcels adjacent to an area of Unique Farmland, it does not propose converting the Unique Farmland to nonagricultural use. In addition, the changes associated with the FFTOD Specific Plan would not be expected to result in future conversion of this farmland to nonagricultural use, because the farmland would remain in the same context of agricultural activities

in an electrical transmission right-of-way that is surrounded by urban development. Therefore, the impact would be less than significant.

- **Biological Resources:**

- *The FFTOD Specific Plan would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS).* The FFTOD Specific Plan Area is heavily urbanized with residential and industrial land uses and lacks natural, vegetated areas (such as creeks or channels) that could support sensitive natural communities or native habitat for sensitive species. The proposed FFTOD Specific Plan provides for infill development in an already highly disturbed urban environment. Any occurrence of a sensitive species in the FFTOD Specific Plan Area is expected to be an incidental occurrence, such as during foraging. It is anticipated that some trees would likely be removed to accommodate construction of development projects, which has the potential to impact nesting birds if future development occurs during the nesting season. By law, future projects developed in accordance with the FFTOD Specific Plan would be required to comply with the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code to protect migratory and nesting birds. As such, impacts to nesting birds would be less than significant.
- *The FFTOD Specific Plan would not have a substantial adverse effect on any sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, nonjurisdictional wetlands) identified in local or regional plans, policies, regulations or by CDFW or USFWS.* According to the National Wetlands Inventory managed by the USFWS, no riparian habitat or nonjurisdictional wetlands are in the FFTOD Specific Plan Area. In addition, the FFTOD Specific Plan Area lacks natural, vegetated areas that could support sensitive natural communities or native habitat for sensitive species. No impact would occur.
- *The FFTOD Specific Plan would not have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means.* There are no state or federally protected wetlands in the FFTOD Specific Plan Area, which is heavily urbanized. The closest mapped wetland to the FFTOD Specific Plan Area is Compton Creek, approximately 1.3 miles south of the FFTOD Specific Plan Area. Therefore, the project would have no impact on wetlands.
- *The FFTOD Specific Plan would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.* The FFTOD Specific Plan Area is heavily urbanized and does not present suitable habitat to support the movement of native or migratory fish. Existing trees and vegetation in

- the FFTOD Specific Plan Area may be used as habitat by migratory birds. However, future projects developed in accordance with the FFTOD Specific Plan would be required to comply with state and federal regulations that protect migratory wildlife, including the MBTA and California Fish and Game Code. Therefore, impacts would be less than significant.
- *The FFTOD Specific Plan would not convert oak woodlands (as defined by the state, oak woodlands are oak stands with greater than 10% canopy cover with oaks at least 5 inch in diameter measured at 4.5 feet above mean natural grade) or other unique native woodlands (juniper, Joshua, southern California black walnut, etc.).* According to the DRP's Distribution of Oak Species in Los Angeles County Map, there is no occurrence of oak woodlands or other unique native woodlands in or near the FFTOD Specific Plan Area, as the area is developed with urban land uses. Therefore, no impact would occur to oak woodlands or native woodlands.
 - *The FFTOD Specific Plan would not conflict with any local policies or ordinances protecting biological resources, including Wildflower Reserve Areas (Los Angeles County Code, Title 12, Ch. 12.36), the Los Angeles County Oak Tree Ordinance (Los Angeles County Code, Title 22, Ch. 22.174), the Significant Ecological Areas (SEAs) (Los Angeles County Code, Title 22, Ch. 102), Specific Plans (Los Angeles County Code, Title 22, Ch. 22.46), Community Standards Districts (Los Angeles County Code, Title 22, Ch. 22.300 et seq.), and/or Coastal Resource Areas (Los Angeles County General Plan, Figure 9.3).* The only applicable local policy or ordinance protecting biological resources for the FFTOD Specific Plan Area is the Los Angeles County Oak Tree Ordinance (County Code of Ordinances Sections 22.56.2050 et seq.), which prohibits anyone from damaging or removing oak trees without a permit from DRP. Although no occurrence of oak woodlands or other unique native woodlands occur in or near the FFTOD Specific Plan Area, existing landscaping in the FFTOD Specific Plan Area may include oak trees. However, future proposed development under the FFTOD Specific Plan would be required to adhere to the Oak Tree Ordinance, which requires permit applicants to submit a site plan and an oak tree report. As a result, the project would not conflict with any local plans or policies protecting biological resources, and impacts would be less than significant.
 - *The FFTOD Specific Plan would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved state, regional, or local habitat conservation plan.* According to the Habitat Conservation Database managed by the USFWS, the FFTOD Specific Plan Area is not in any adopted Habitat Conservation Plan area. In addition, based on the California Natural Community Conservation Plans Map created by CDFW, the FFTOD Specific Plan Area is not in any Natural Community Conservation Plan area. No impact would occur.

- **Geology and Soils:**

- *The FFTOD Specific Plan would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known active fault trace.* The California Earthquake Hazards Zone Application Map issued by the California Geological Survey shows no active faults or Alquist Priolo Earthquake Fault Zones in the FFTOD Specific Plan Area. The closest known fault is the Newport-Inglewood-Rose Canyon Fault approximately 2.4 miles southwest of the FFTOD Specific Plan Area. Due to the distance between the FFTOD Specific Plan Area and the nearest active fault, future development pursuant to implementation of the FFTOD Specific Plan is unlikely to experience ground rupture. The impact would be less than significant.
- *The FFTOD Specific Plan would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking.* Future development pursuant to implementation of the FFTOD Specific Plan would be required to adhere to the provisions of the California Building Code, which are imposed on development projects by Los Angeles County during the building plan check and development review process. Compliance with the requirements of the California Building Code would ensure that impacts related to the hazards associated with strong seismic ground shaking would be less than significant.
- *The FFTOD Specific Plan would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides.* The FFTOD Specific Plan Area has a flat topography. In addition, according to the California Earthquake Hazards Zone Application Map, the FFTOD Specific Plan Area is not in or near a landslide zone. Therefore, no impact would occur.
- *The FFTOD Specific Plan would not have soils incapable of adequately supporting the use of onsite wastewater treatment systems where sewers are not available for the disposal of wastewater.* The FFTOD Specific Plan Area is served by a public sanitary sewer system. Future developments pursuant to implementation of the FFTOD Specific Plan would include connections to sanitary sewers and would not use on site wastewater treatment systems. No impact would occur.
- *The FFTOD Specific Plan would not Conflict with the Hillside Management Area Ordinance (Los Angeles County Code, Title 22, Ch.22.104).* The FFTOD Specific Plan Area has a flat topography and is not subject to the Hillside Management Area Ordinance.

- **Hazards and Hazardous Materials:**

- *The FFTOD Specific Plan would not be in an airport land use plan, or where such a plan has not been adopted, within 2 miles of a public airport or public use airport. The project would not result in a safety hazard or excessive noise for people residing or*

- working in the project area.* According to the Los Angeles County Airport Land Use Plan, the FFTOD Specific Plan Area is not in an airport land use plan or within 2 miles of a public or public use airport. The nearest public use airport is the Compton/Woodley Airport, approximately 3.5 miles from the southern boundary of the FFTOD Specific Plan Area. Therefore, the project would not result in a safety hazard or excessive noise for people residing or working in the area and no impact would occur.
- *The FFTOD Specific Plan would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires, because the project is not in a high fire hazard area with inadequate access.* According to the Fire Hazard Severity Zones Map prepared by the California Department of Forestry and Fire Protection (CAL FIRE), the FFTOD Specific Plan Area is not in or near a Very High Fire Hazard Severity Zone. Therefore, there would be no impact to people or structures in a high fire hazard area with inadequate access.
 - *The FFTOD Specific Plan would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires, because the project is not in an area with inadequate water and pressure to meet fire flow standards.* The FFTOD Specific Plan Area is not in a Very High Fire Hazard Severity Zone. Furthermore, the Florence-Firestone community is served by Fire Station 16 at 8010 Compton Avenue. The Los Angeles County Fire Department requires adequate water and pressure to service an area, and adequate water and pressure to meet fire flow standards would be continued with buildout of the FFTOD Specific Plan. Therefore, the impact would be less than significant.
 - *The FFTOD Specific Plan would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires, because the Project is not in proximity to land uses that have the potential for dangerous fire hazard.* The FFTOD Specific Plan Area is presently heavily urbanized with industrial and commercial land uses that inherently have some fire hazard potential. However, these existing uses primarily consist of retail store, shopping center, and auto service commercial uses with nearby residential uses that are typical of an urban setting and would not be considered a dangerous fire hazard. Additionally, the proposed FFTOD Specific Plan zones would consider uses suitable for employment near residential areas as well as the creation of transitions between industrial uses that would serve to limit exposure of people to certain land uses. Therefore, a less than significant impact would occur to people or structures in proximity to land uses that have the potential for fire hazard.
 - *The FFTOD would not propose a use that would constitute a potentially dangerous fire hazard.* The FFTOD Specific Plan would address land use and zoning changes and provide recommendations for mobility improvements that support housing density and employment in proximity to the LA Metro A Line Stations (i.e., Slauson, Florence, and Firestone Stations) in the community. It would include light industrial and commercial

land uses that may use or manufacture products/materials that could present some fire hazard. However, the FFTOD Specific Plan Area is already heavily urbanized with industrial and commercial land uses that also inherently have some fire hazard potential. The majority of the existing industrial uses in the FFTOD Specific Plan Area are light manufacturing, with a small amount of heavy manufacturing, with industrial uses primarily clustered along industrial corridors with auto related uses. The proposed Industrial Flex zone would maintain light industrial uses and jobs while introducing new neighborhood-serving commercial and innovation uses suitable for employment near residential areas. The Mixed-Use Zoning Categories (MU-1, MU-2, MU-3, and MU-T) would create an employment-focused, high-intensity mixed-use transit district that allows for the creation of transitions between industrial uses. The Industrial Flex zone would allow for the creation of transitions between employment uses and residential to encourage less noxious uses and focus on light industrial, neighborhood-serving commercial and office uses. Therefore, future development in these zones would not constitute a potentially dangerous fire hazard or increase the potential for dangerous fire hazards as they would consist of typical urban land uses, similar to existing conditions. The impact would be less than significant.

- **Hydrology and Water Quality:**

- *The FFTOD Specific Plan would not substantially alter the existing drainage pattern of the site or area, including through the alteration of a federal 100-year flood hazard area or County Capital Flood floodplain; the alteration of the course of a stream or river; or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows which would expose existing housing or other insurable structures in a federal 100-year flood hazard area or County Capital Flood floodplain to a significant risk of loss or damage involving flooding.* The Federal Emergency Management Agency (FEMA) Flood Map Service Center, managed by the Department of Homeland Security, indicates that the FFTOD Specific Plan Area is in an area of minimal flood hazard. In addition, DRP's GIS-NET Public Map shows no streams or rivers in the FFTOD Specific Plan Area. Therefore, future development pursuant to implementation of the FFTOD Specific Plan would not impede or redirect flood flows and would not expose existing housing to flood hazards. The impact would be less than significant.
- *The FFTOD Specific Plan would not otherwise place structures in federal 100-year flood hazard or County Capital Flood floodplain areas which would require additional flood proofing and flood insurance requirements.* The FFTOD Specific Plan Area is designated as an area of minimal flood hazard. Future development pursuant to implementation of the FFTOD Specific Plan would not place structures in the federal 100-year flood hazard or Los Angeles County Capital floodplain areas. The impact would be less than significant.

- *The FFTOD Specific Plan would not conflict with the Los Angeles County Low Impact Development Ordinance (Los Angeles County Code, Title 12, Ch. 12.84).* All designated, nondesignated, street and road construction, and single-family hillside home projects in the Unincorporated Areas of Los Angeles County, including in the Florence-Firestone community, are required to comply with the Low Impact Development (LID) Standards Manual. A comprehensive LID plan and analysis demonstrating compliance with the LID Standards Manual must be submitted for review and approval by the Director of Public Works. Future redevelopment and infill development pursuant to implementation of the FFTOD Specific Plan would be required to adhere to the ordinance as applicable. No impact would occur.
- *The FFTOD Specific Plan would not use on-site wastewater treatment systems in areas with known geological limitations (e.g., high groundwater) or in close proximity to surface water (including, but not limited to, streams, lakes, and drainage course).* The FFTOD Specific Plan Area is served by existing public sanitary sewers. No wastewater treatment systems are proposed in the FFTOD Specific Plan Area. Additionally, the FFTOD Specific Plan Area does not contain geological limitations or surface water such as rivers and lakes. Therefore, no impact related to use of wastewater treatment systems in these areas would occur.
- *The FFTOD Specific Plan would not risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones.* The FFTOD Specific Plan Area is designated as an area of minimal flood hazard. The Los Angeles County Tsunami Inundation Maps created by the California Department of Conservation show that the FFTOD Specific Plan Area is not in a tsunami inundation zone. In addition, the Dam Locations Map created by the Los Angeles County Public Works show no dams or reservoirs in or near the area, indicating that the FFTOD Specific Plan Area is not in a seiche zone. Because the FFTOD Specific Plan Area is not in any of the aforementioned zones, no impact related to the risk of release of pollutants due to inundation would occur.
- **Land Use and Planning:**
 - *The FFTOD Specific Plan would not physically divide an established community.* Implementation of the FFTOD Specific Plan would include land use and zoning changes and provide recommendations for mobility improvements to support transit-oriented development in proximity to the LA Metro A Line Station area (i.e., Slauson, Florence, and Firestone Stations). These improvements would make it easier for bicyclists and pedestrians to access these stations and enhance commercial development focused on serving the local community. Redevelopment and infill development of parcels in the FFTOD Specific Plan Area would result in additional housing units and promote multi-modal connectivity and increase access to transit within the community. Therefore, implementation of the project would not physically divide an established community. A less than significant impact would occur.

- *The FFTOD Specific Plan would not conflict with the goals and policies of the General Plan related to Hillside Management Areas or Significant Ecological Areas.* DRP defines Hillside Management Areas (HMAs) as areas with 25 percent or greater natural slopes, and Significant Ecological Areas (SEAs) as areas with irreplaceable biological resources. According to DRP's GIS-NET Public database, no HMAs or SEAs are in or near the FFTOD Specific Plan Area. Therefore, the project would not conflict with the goals and policies of the General Plan related to HMAs or SEAs and no impact would occur.
- **Mineral Resources:**
 - *The FFTOD Specific Plan would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.* According to the Generalized Mineral Land Classification Map of Los Angeles County – South Half issued by the California Geological Survey, the majority of the FFTOD Specific Plan Area is designated as Mineral Resource Zone (MRZ) 1, which indicates that no significant mineral deposits are present, or that there is little likelihood for their presence. The northern portion of the FFTOD Specific Plan Area, from Slauson Avenue until approximately E 62nd Street, is designated MRZ-2, which indicates that the area contains significant mineral deposits or high likelihood exists for their presence. However, that portion of the FFTOD Specific Plan Area is currently heavily urbanized with residential and industrial uses. Implementation of the FFTOD Specific Plan would provide for redevelopment and infill development of parcels that are incompatible with mining. In addition, no active mines are in or near the FFTOD Specific Plan Area. Therefore, a less than significant impact would occur related to the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.
 - *The FFTOD Specific Plan would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.* The General Plan does not specify areas of significant availability of a locally important mineral resource recovery site in the FFTOD Specific Plan Area. The FFCP also does not specify such mineral resource recovery areas. Although a portion of the FFTOD Specific Plan Area is designated as MRZ-2 the land is already built out with urban land uses incompatible with mining. Implementation of the FFTOD Specific Plan would provide for redevelopment and infill development of parcels that would also be incompatible with mining. Therefore, the project would not result in the substantial loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. The impact would be less than significant.
- **Noise:**
 - *The FFTOD Specific Plan would not be in the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public*

airport or public use airport. The project would not expose people residing or working in the project area to excessive noise levels. According to the Los Angeles County Airport Land Use Plan, the FFTOD Specific Plan Area is not in an airport land use plan or a private airstrip, or within 2 miles of a public airport or public use airport. The closest airport is the Compton/Woodley Airport, approximately 3.5 miles from the southern boundary of the FFTOD Specific Plan Area. The project would not expose people residing or working in the FFTOD Specific Plan Area to excessive noise levels from aircraft. No impact would occur.

- **Recreation:**

- *The FFTOD Specific Plan would not interfere with regional trail connectivity.* According to the Los Angeles County Department of Parks and Recreation's Trails Map, there are no Los Angeles County trails in the FFTOD Specific Plan Area. The project would not interfere with regional open space connectivity, and no impacts would occur.

- **Wildfire:**

- *The FFTOD Specific Plan would not be located in or near state responsibility areas or lands classified as very high fire hazard severity zones. The project would not substantially impair an adopted emergency response plan or emergency evacuation plan; exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire due to slope, prevailing winds, and other factors; require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes; or expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.* According to the California Fire Hazard Severity Zone Map prepared by CAL FIRE, the FFTOD Specific Plan Area is not within or near a Very High Fire Hazard Severity Zone within a Local Responsibility Area or a State Responsibility Area. Therefore, no impacts related to high fire hazard severity zones would occur.

4.1.2 SECTION 3.0 OF THE DRAFT EIR

This section identifies impacts of the project determined in the Draft EIR to be less than significant without implementation of programmatic mitigation measures.

1. Aesthetics

Finding: The proposed project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no

changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Draft EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact AES-1:** *The project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings because of height, bulk, pattern, scale, character, or other features and/or conflict with applicable zoning and other regulations governing scenic quality.*

Implementation of the FFTOD Specific Plan would establish transit-oriented policy direction, development standards, and implementation programs to encourage infill development with pedestrian friendly and community serving uses near transit stops. It would enable additional development of mixed use, commercial, and residential land uses and provide mobility improvements that support increased housing density and employment in proximity to the three LA Metro A (Blue) Line Stations in the community (Slauson, Florence, and Firestone stations). These improvements would allow for increased development intensity, taller buildings, and/or streetscape changes that are consistent with a transit oriented development pattern.

The FFTOD Specific Plan includes Guiding Principles and Concepts for each station and that serve as the approach to land use, urban design building standards, and mobility improvements. Zone regulations intended to guide development and decision making to achieve the vision and guiding principles of the FFTOD Specific Plan provide a detailed list of allowed land uses, permit requirements, and objective development standards for each zone in the FFTOD Specific Plan Area. Urban design standards of the FFTOD Specific Plan would provide a comprehensive approach to high quality design for the physical design of the FFTOD Specific Plan Area and would serve to upgrade and improve the aesthetic appearance of existing buildings, open space areas, and other site improvements through architectural and landscape improvements to enhance the overall visual character of the FFTOD Specific Plan Area.

The FFTOD Specific Plan also includes recommended strategies to create a multi-modal environment that responds to the needs for more efficient and balanced transportation systems. The FFTOD Specific Plan would implement the Los Angeles County Transit Oriented District Toolkit (2019) and proposes to enhance the “frontage zone” portion of sidewalks in specific locations. In addition, major improvements have been identified to improve access to the LA Metro A Line Stations in the FFTOD Specific Plan Area with a focus on pedestrian accessibility.

Overall, development in accordance with the FFTOD Specific Plan would not degrade the existing visual character of the highly urbanized Florence-Firestone community. Redevelopment of existing and/or new buildings would be designed based on the FFTOD Specific Plan's urban design guidelines and include architectural and landscaping details that complement and enhance the overall quality of the community. The FFTOD Specific Plan is consistent with and provides a framework for implementing the goals, land uses, and policies of the General Plan, broader transit oriented development goals of Los Angeles County, and the FFCP. Impacts would be less than significant.

- **Impact AES-2:** *The project would not create a new source of substantial shadows, light, or glare which would adversely affect day or nighttime views in the area.*

The FFTOD Specific Plan Area is a highly urbanized environment, and there are a number of existing sources of nighttime illumination. Buildout of the FFTOD Specific Plan would alter and intensify land uses and their related lighting sources throughout the FFTOD Specific Plan Area by introducing new building (interior and exterior), security, sign, street, parking lights. In addition to new mobility and transit amenities (lighted shelters, wayfinding signage) and lighting to increase the accessibility, safety, and convenience of multimodal travel, the project would introduce sources of aesthetic lighting and glare in the form of glazing and building materials.

The FFTOD Specific Plan includes development standards related to lighting and building materials that would reduce light and glare impacts generated by the project. In general, all outdoor lighting systems, including architectural lighting, shall not aim directly at the open sky, off site, or onto adjacent uses. Blinking, flashing, and oscillating lights are prohibited, and warm white lights shall be used where possible. Colored lights shall be avoided and only be used if they are part of a comprehensive architectural lighting theme of commercial areas or establishments. All parking structures must screen night lighting to avoid uplighting, spillover, and glare on nearby properties. Future development projects shall be required to comply with the specific development standards for lighting of their respective zones. Generally, all lighting and lighting fixtures shall be designed to complement buildings, be of an appropriate scale, avoid creating glare, and provide adequate light over walkways and parking areas to foster pedestrian safety.

Overall, development in accordance with the FFTOD Specific Plan would introduce new sources of light and glare. However, the FFTOD Specific Plan Area is highly urbanized; new light and glare associated with the FFTOD Specific Plan would be typical of the surrounding area and what is expected for an urban, transit-oriented

community. Adherence to the FFTOD Specific Plan standards, Los Angeles County Code, and California Building Energy Efficiency Standards would reduce project-generated lighting and glare impacts to less-than-significant levels.

2. Air Quality

Finding: The proposed project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Draft EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact AQ-4:** *The project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.*

Future development under the FFTOD Specific Plan is assumed to include mixed-use, residential, retail, commercial service, and industrial uses. New industrial uses would be required to be in compliance with South Coast Air Quality Management District (SCAQMD) Rule 402, Nuisance. Likewise, existing facilities are required to be in compliance with SCAQMD Rule 402 to prevent nuisances on sensitive land uses. In addition, the FFTOD Specific Plan includes land use regulations and development standards for TOD zones, which for mixed use communities for example, denote that operations shall not create objectionable and/or obnoxious dust, light, matter, mud, noise, odor, refuse, smoke, steam, vibration, maintenance needs of grounds or buildings, or other nuisance(s). Therefore, impacts related to other emissions, such as those leading to odors, would be less than significant.

3. Cultural Resources

Finding: The proposed project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Draft EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact CUL-4:** *The project would not disturb any human remains, including those interred outside of formal cemeteries.*

The FFTOD Specific Plan Area is developed and has previously been subjected to substantial ground disturbance, which likely already resulted in the discovery of subsurface materials such as human remains. Nevertheless, excavation during construction activities by future development projects pursuant to implementation of the FFTOD Specific Plan has the potential to unexpectedly encounter human remains or disturb human burial grounds, including Native American burials. California Health and Safety Code Sections 7050.5, 7051, and 7054 requires that if human remains are discovered, disturbance of the site halt and remain halted until the coroner has investigated and made recommendations to the person responsible for the excavation, or to his or her authorized representative. If the coroner determines that the remains are not subject to their authority and if the coroner recognizes or has reason to believe the human remains to be those of a Native American, they will contact the Native American Heritage Commission by phone within 24 hours pursuant to Section 5097 of the California PRC. Therefore, compliance with these regulations would ensure impacts to discovery of human remains are less than significant.

4. **Energy**

Finding: The proposed project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Draft EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact ENE-1:** *The project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.*

Energy-requiring activities range from equipment operation during construction, to building operations, to transportation during all phases of the FFTOD Specific Plan implementation; Fuel, electricity, and natural gas consumption associated with these activities was estimated and presented within Tables 3.4-1 through 3.4-5 of the Draft EIR. Fuel consumed during construction would be temporary in nature and would not represent a significant demand on available fuel, beyond normal construction fuel usage. There are no known project characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at comparable

construction sites in Los Angeles County. Operational transportation would be the greatest energy consuming factor associated with implementation of the FFTOD Specific Plan. The FFTOD Specific Plan provides for employment-generating land uses as well as a range of housing options and implements land use and transportation planning strategies that would reduce the demand for motor vehicle travel, and thereby minimize overall transportation energy (fuel) demands. Building operations would account for approximately 26 percent of the energy consumption for the FFTOD Specific Plan Area. Compliance with existing regulations, including Los Angeles County's Green Building Ordinance, would ensure that the proposed facilities would be more energy efficient than existing, average, similar-use buildings, as energy efficiency requirements have become more stringent over time. Considering this information, the FFTOD Specific Plan would not be expected to cause inefficient, wasteful, or unnecessary consumption of energy and this impact is considered less than significant.

- **Impact ENE-2:** *The project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency.*

Implementation of the FFTOD Specific Plan would result in the development of new land uses that would induce new demand for electricity and natural gas, as well as induce additional vehicle miles traveled that would result in the consumption of fossil fuels. However, design and construction of buildings would comply with the most recently adopted California Building Energy Efficiency Standards Code and California Green Building Standards Code (CALGreen), and the Los Angeles County CAP and OurCounty Sustainability Plan. This would ensure that future development would consume energy efficiently through the incorporation of such features as efficient water heating systems, high performance roofs and walls, and high efficacy lighting. Therefore, implementation of the FFTOD Specific Plan would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. This impact is less than significant.

5. Geology and Soils

Finding: The proposed project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Draft EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact GEO-1:** *The project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving: seismic-related ground failure, including liquefaction.*

Because Southern California is a seismically active area that can produce a high acceleration of seismic shaking, there is potential for exposure of people or structures to liquefaction and liquefaction-induced lateral spreading within the proposed FFTOD Specific Plan Area. However, conforming to the CBC and Los Angeles County Building Code would reduce impacts from liquefaction and liquefaction-induced lateral spreading within the proposed FFTOD Specific Plan Area to the maximum extent practicable under currently accepted engineering practices. Therefore, future implementation of the FFTOD Specific Plan would result in less-than-significant impacts related to exposing people or structures to liquefaction and liquefaction-induced lateral spreading.

- **Impact GEO-2:** *The project would not result in substantial soil erosion or the loss of topsoil.*

Although the FFTOD Specific Plan Area is in a developed urban area, future construction activities may include excavation, grading, and other soil-disturbing activities that could result in soil erosion or loss of topsoil during rain or high-wind events. However, for projects disturbing more than 1 acre of ground surface, the Construction General Permit requires the preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) that would include erosion control and sediment control best management practices (BMPs) such as sandbags and covering soil stockpiles, which would ensure that soil erosion and loss of topsoil on the construction site would be minimized. Compliance with the Construction General Permit and BMPs identified in the Los Angeles County Municipal Separate Storm Sewer System (MS4) Permit requirements would ensure less-than-significant impacts related to erosion and topsoil during construction of specific developments in the FFTOD Specific Plan Area. Additionally, as part of compliance with the LID Standards, any specific future development project under the FFTOD Specific Plan qualifying as a new development or a redevelopment project would be designed to reduce off-site runoff, promote rainwater harvesting, and reduce erosion and hydrologic impacts downstream. The presence of vegetation on landscaped areas would also reduce the ability of soil to be eroded and lost by wind erosion. Impacts related to erosion and topsoil loss during operation of proposed development would be less than significant.

- **Impact GEO-3:** *The project would not be situated on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.*

Development in accordance with the FFTOD Specific Plan requires conformance with the California Building Code (CBC) and Los Angeles County Building Code that would reduce impacts from liquefaction and liquefaction-induced lateral spreading within the FFTOD Specific Plan Area to the maximum extent practicable under currently accepted engineering practices. These engineering practices could include densification of soils, soil reinforcement, and drainage/dewatering to reduce pore water pressure within the soil. Therefore, the implementation of the FFTOD Specific Plan would result in less-than-significant impacts related to liquefaction and liquefaction-induced lateral spreading.

Adherence to CBC and Los Angeles County Building Code requirements would include the preparation of a geotechnical investigation by a state licensed geotechnical engineer. The most effective, feasible, and economical site preparation measures recommended in the report would be incorporated into the site design in accordance with the building requirements. Therefore, the potential for unstable soils to adversely affect proposed structures and improvements resulting in settlement, subsidence, or collapse would be less than significant.

- **Impact GEO-4:** *The project would not create substantial or indirect risks to life or property related to expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994).*

Highly expansive soils swell when they absorb water and shrink as they dry and can damage building foundations and roads. Most of the soils on the project site are loamy fine sand, and thus could be expansive. However, future development projects (new development or redevelopment) pursuant to the FFTOD Specific Plan would be required to comply with applicable ordinances set forth by CBC and Los Angeles County and the most recent building and seismic codes in effect at the time of project design. Compliance with the CBC and Los Angeles County Building Code would ensure that FFTOD Specific Plan implementation would not substantially increase hazards from expansive soils.

6. Greenhouse Gases

Finding: The proposed project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Draft EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact GHG-2:** *The project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases.*

The FFTOD Specific Plan would not conflict with applicable plans adopted for the purpose of reducing greenhouse gas (GHG) emissions, which include California Air Resource Board (CARB)'s Scoping Plan, Southern California Association of Governments (SCAG)'s 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) also known as Connect SoCal, and the Los Angeles County Community Climate Action Plan (CCAP).

The FFTOD Specific Plan and its objectives would directly support the goals of Assembly Bill (AB) 32 and Senate Bill (SB) 32 targeted by the CARB Scoping Plan. For example, the State's 2017 Scoping Plan update includes vehicle miles traveled (VMT) reduction goals that call for promotion of land use and community design that reduce VMT, transit-oriented development, and complete street design policies that prioritize transit, biking, and walking. As discussed in Section 3.14 Transportation of the Draft EIR, the FFTOD Specific Plan scenario would have an average daily VMT per service population that is 33 percent below the 2020 South County Baseline. In addition, the FFTOD Specific Plan would comply with the most current Building Energy Efficiency Standards and California Green Building Standards Code (CALGreen) requirements. The CALGreen requirements include mandatory measures for all new building construction, which would result in energy conservation, and make a major contribution in meeting the State's goals established by AB 32 and SB 32 for reduction in GHG emissions. Further, future buildings constructed over the lifetime of the project would be subject to the future triannual updates to the Building and Energy Efficiency Standards, which will ultimately require zero net energy construction.

The FFTOD Specific Plan would provide more opportunities for affordable housing, encourage transit oriented development, promote active transportation, improve access to transit, reduce vehicles miles traveled by cars, and streamline the environmental

review of future development projects, all of which are consistent with the guiding policies of Connect SoCal. The FFTOD Specific Plan includes strategies to create a multi-modal environment that responds to the needs for more efficient and balanced transportation systems. The recommended mobility infrastructure improvements identified support transit, pedestrian, and bicycle mobility, and improve parking conditions. Additionally, the FFTOD Specific Plan scenario would have an average daily VMT per service population that is 33 percent below the 2020 South County Baseline. As such, the FFTOD Specific Plan would further expand the ability for residents and employees to walk, bicycle, and take transit to complete their necessary trips, resulting in greater VMT efficiency in terms of daily VMT per service population, which is consistent with regional goals to reduce passenger VMT.

A consistency analysis with the FFTOD Specific Plan to the applicable measures in the Los Angeles County CCAP is provided in Table 3.6-7 Consistency with the Unincorporated Los Angeles County CCAP of the Draft EIR. As identified in the table, the FFTOD Specific Plan would be consistent with the measures in the CCAP.

Therefore, the FFTOD Specific Plan would not obstruct implementation of the CARB Scoping Plan, would not interfere with SCAG's ability to implement the regional strategies outlined in the 2020-2045 RTP/SCS, and would not conflict with the CCAP. Impacts are considered less than significant.

7. Hazards and Hazardous Materials

Finding: The proposed project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Draft EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact HAZ-1:** *The project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.*

Demolition and construction activities would require transport, use, and disposal of hazardous materials. Operation of the FFTOD Specific Plan would include new or different land use designations that may involve the routine use of substances classified as hazardous materials including fuels, pesticides, paints, and other materials. Upon compliance with federal, state, and Los Angeles County regulatory requirements (e.g.,

U.S. Department of Transportation [DOT], California Division of Occupational Safety and Health [Cal/OSHA], and Los Angeles County Fire Department [LACoFD]), construction and operation activities of future development projects related to implementation of the FFTOD Specific Plan would not pose substantial hazards to the public or the environment, and impacts would be less than significant.

- **Impact HAZ-3:** *The project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school.*

FFTOD Specific Plan buildout would result in usage and storage of hazardous materials on site and transportation of hazardous materials to and from the FFTOD Specific Plan Area, similar to existing conditions. Project operation could emit hazardous emissions or handle hazardous materials within 0.25 mile of an existing school. However, compliance with the regulatory requirements would reduce hazards from hazardous materials emissions and handling such that no substantial health risks to persons at the nearby schools would occur; impacts would be less than significant.

- **Impact HAZ-5:** *The project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.*

It is possible that during the construction phase of future transportation or mobility projects, the presence of construction equipment and materials adjacent to roadways could temporarily impede emergency access. Compliance with any requirements, such as a traffic management plan, deemed necessary for approval of the Los Angeles County Public Works Traffic and Lighting Division, would ensure impacts to emergency access would be less than significant.

8. Hydrology and Water Quality

Finding: The proposed project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Draft EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact HWQ-1:** *The project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.*

Because each future development project pursuant to implementation of the FFTOD Specific Plan would be required to comply with National Pollutant Discharge Elimination System (NPDES) requirements, BMPs would be in place to prevent potentially harmful materials from being accidentally spilled or improperly disposed of during construction activities. Future development projects disturbing more than 1 acre of ground surface would be required to develop a SWPPP as part of compliance with the Construction General Permit that implements BMPs designed to prevent water quality degradation. Projects disturbing less than 1 acre of ground surface during construction would not be required to prepare a SWPPP but would be required to implement the minimum BMPs required by the Los Angeles County MS4 permit, thereby protecting water quality. As a result, construction impacts related to water quality standards or waste discharge requirements from implementation of the FFTOD Specific Plan would be less than significant.

Future development in the FFTOD Specific Plan Area would include residential, mixed use, commercial, and industrial uses; pollutants associated with these land uses typically include sediments, trash, petroleum products, metals, and chemicals. Compliance with regulations and implementation of LID practices per Los Angeles Regional Water Quality Control Board (LARWQCB) requirements and Los Angeles County Public Works Green Infrastructure Guidelines would minimize pollutants being transported off site into downstream receiving waters, and projects implemented in accordance with the FFTOD Specific Plan would not violate water quality standards or waste discharge requirements.

The FFTOD Specific Plan would not result in the generation of substantial sources of polluted runoff because the project would be required to comply with NPDES requirements, County Stormwater Pollution Control Requirements for Construction Activities, and the requirements of the County LID Standards Manual. Impacts would be less than significant.

- **Impact HWQ-2:** *The project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.*

Implementation of the FFTOD Specific Plan would include infill and redevelopment that would result in population growth; thereby increasing demand on water supplies.

Because groundwater withdrawals from the Central Groundwater Basin are limited based on the adjudication, compliance with the judgment that set pumping rights would eliminate the potential for the water agencies that will serve the proposed FFTOD Specific Plan to substantially impact the groundwater aquifer. Buildout of the FFTOD Specific Plan would generate little increase in runoff to the existing drainage system because of the area's developed condition, and because future development projects would be required to incorporate LID practices per LARWQCB requirements and Los Angeles County Public Works Green Infrastructure Guidelines. Based on the depths to groundwater in the FFTOD Specific Plan, excavation for development would not come into contact with groundwater or require dewatering during excavation activities to an extent that groundwater levels would be adversely affected. Furthermore, because groundwater is not present close to the ground surface, stormwater infiltration BMPs (as described in the County LID Standards Manual) would be technically feasible on site, the use of which could increase the amount of groundwater recharge in the FFTOD Specific Plan Area compared to existing conditions. Therefore, implementation of the FFTOD Specific Plan would result in less-than-significant impacts on the Central Groundwater Basin from groundwater use and would result in less-than-significant impacts to the existing recharge capabilities of the area overlying the Central Groundwater Basin.

- **Impact HWQ-3:** *The project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of a federal 100-year flood hazard area or County Capital Flood floodplain; the alteration of the course of a stream or river; or through the addition of impervious surfaces, in a manner which would: result in substantial erosion or siltation on- or off site.*

With implementation of erosion and sediment control BMPs, construction activities associated with future development projects pursuant to implementation of the FFTOD Specific Plan would result in less-than-significant erosion and siltation impacts. Because future development projects would be required to implement the County LID Standards Manual and Green Infrastructure Guidelines, implementation of development within the FFTOD Specific Plan Area would result in a less-than-significant erosion and siltation impact during operations.

- **Impact HWQ-4:** *The project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of a federal 100-year flood hazard area or County Capital Flood floodplain; the alteration of the course of a stream or river; or through the addition of impervious surfaces, in a manner which would: substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site.*

The majority of the FFTOD Specific Plan Area is built out with urban land uses. Each future development project pursuant to implementation of the FFTOD Specific Plan would be required to have site-specific hydrology and hydraulic studies to determine capacity of the existing storm drain systems and project-specific impacts on such systems prior to approval by the Los Angeles County Public Works. As such, buildout of the FFTOD Specific Plan would not cause a substantial increase in stormwater runoff and would not result in flooding on- or off site with compliance of the Los Angeles County MS4 permit and site-specific allowable discharge rates. Impacts would be less than significant.

- **Impact HWQ-6:** *The project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.*

Construction activities associated with the FFTOD Specific Plan would be required to comply with the NPDES permit that would include typical BMPs for erosion control, sediment control, and waste management. Operational activities associated with future development projects of the FFTOD Specific Plan would be required to meet MS4 permit requirements through compliance with the County LID Standards Manual. Because groundwater withdrawals from the Central Groundwater Basin are limited based on the adjudication, compliance with the judgment that set pumping rights would eliminate the potential for water agencies serving the FFTOD Specific Plan Area to substantially impact the groundwater aquifer. Therefore, implementation of the FFTOD Specific Plan would not conflict with a water quality control plan or sustainable groundwater management plan and impacts would be less than significant.

9. Land Use and Planning

Finding: The proposed project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Draft EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact LUP-1:** *The project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.*

The FFTOD Specific Plan was developed in compliance with requirements of Government Code Sections 65450-65457 and outlines the regulatory, design, implementation, financing, and infrastructure framework to leverage transit investments in the Florence-Firestone Community. Per California State law, Specific Plans must be internally consistent with the jurisdiction's General Plan. The FFTOD Specific Plan is consistent with and provides a framework for implementing the goals, land uses, and policies of the General Plan; broader TOD and sustainability goals of Los Angeles County; and the FFCP. The FFTOD Specific Plan would also be consistent with and would not conflict with SCAG's regional planning goals and policies (i.e., the 2020-2045 RTP/SCS [Connect SoCal]). Therefore, implementation of the proposed project would not result in significant land use impacts.

10. Population and Housing

Finding: The proposed project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Draft EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact POP-1:** *The project would not induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).*

The population, housing, and employment projections with buildout of the FFTOD Specific Plan are greater than current projections identified by SCAG. This increase in population, housing, and employment projections is considered substantial. However, the FFTOD Specific Plan is consistent with SCAG's Connect SoCal goals for focusing higher-density development in transit-rich areas. The FFTOD Specific Plan would provide more opportunities for affordable housing, encourage transit oriented development, promote active transportation, improve access to transit, reduce VMT, and streamline the environmental review of future development projects, all of which are consistent with the guiding policies of Connect SoCal. Furthermore, the

determination of whether the proposed growth represents a significant impact is whether the project would induce additional growth that would result in significant impacts to the environment.

The determination of whether the FFTOD Specific Plan would induce growth in the vicinity of the FFTOD Specific Plan Area or within Los Angeles County is based on whether the increase in population and housing in the FFTOD Specific Plan Area would increase the need for additional commercial or public services beyond the existing commercial or public services and the commercial services that would result as part of the project. In addition, a determination of inducement of growth is whether the increase in job growth in the FFTOD Specific Plan Area would increase the need for additional housing beyond the existing housing and the housing proposed as part of the project.

The exceedance of population and housing projection over an approximate 15-year period in the region is considered nominal because the growth within the FFTOD Specific Plan would represent 3 percent of Los Angeles County's incremental population growth and 3 percent of Los Angeles County's incremental residential growth. Furthermore, the FFTOD Specific Plan focuses on infill development within walking distance of the Metro A Line Slauson, Florence, and Firestone stations in an area that is presently completely built out, as described in Section 3.14 Transportation of the Draft EIR. The FFTOD Specific Plan would further expand the ability for residents and employees to walk, bicycle, and take transit to complete their necessary trips, resulting in greater VMT efficiency in terms of daily VMT per service population. Therefore, the FFTOD Specific Plan would not induce substantial additional population and housing growth that would result in significant impacts to the environment.

The increase in jobs in the FFTOD Specific Plan Area represents 0.5 percent of the projected job growth in Los Angeles County for 2035. Furthermore, based on an average unemployment rate of 7.1 percent for Florence-Firestone and 5 percent for Los Angeles County (2016), it is reasonable to assume that there will be people living in Los Angeles County and the region available to fill the increase in jobs created in the FFTOD Specific Plan Area without a substantial amount of migration into the region that would require new housing beyond the available housing in the FFTOD Specific Plan Area, Los Angeles County, or region. Therefore, the increase in jobs would not induce additional growth that would result in significant impacts to the environment.

The FFTOD Specific Plan would not induce substantial unplanned population growth in an area, directly or indirectly. Impacts would be less than significant. Impacts would be less than significant.

- **Impact POP-2:** *The project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.*

Buildout of the FFTOD Specific Plan would provide a net increase of 12,110 new residential dwelling units over existing conditions in the FFTOD Specific Plan Area. Future development projects pursuant to implementation of the FFTOD Specific Plan may result in temporary displacement of residents during construction activities. However, future development projects would occur sporadically at a parcel by parcel project level, the potential displacement of persons residing in an infill or redevelopment parcel would be short-term, and the project would result in a greater number of residential units to house residents of the area, including those that may be temporarily displaced. Therefore, impacts related to displacement of housing or people would be less than significant.

11. Public Services

Finding: The proposed project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Draft EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact PUB-1:** *The project would not create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of new or physically altered fire or police protection facilities in order to maintain acceptable service ratios, response times, or other performance objectives.*

Buildout of the FFTOD Specific Plan would result in a net increase of approximately 42,518 additional people associated with approximately 12,110 net new housing units and 2,734 new jobs associated with new commercial development in the FFTOD Specific Plan Area. The increase in fire department staffing and equipment required to serve the buildout of the proposed Specific Plan would be accommodated by the existing fire stations, and new or physically altered fire protection facilities would not be required to serve the buildout of the Specific Plan. The Los Angeles Sheriff's

Department (LASD) calculates that buildout of the FFTOD Specific Plan would require approximately 42 additional deputies to serve the FFTOD Specific Plan Area. As future development occurs, tax revenues from property and sales taxes would be generated and deposited in the County's General Fund and the State Treasury, a portion of which would be allocated to the LASD to ensure adequate staffing and equipment are provided to adequately serve project-related increases in service-call demands.

Additionally, individual projects would require incorporation of fire detection and suppression systems (fire alarms and sprinklers), emergency access (fire lanes), and properly placed fire hydrants as required by the Los Angeles County Fire Code (Chapter 12.14 of the County Municipal Code). These project design elements are reviewed and approved by the County Public Works Division and Fire Department prior to the issuance of development permits for each development project in the Specific Plan. Likewise, individual projects would also be reviewed by County and Sheriff Department staff prior to the developer's receipt of permits to ensure that appropriate security measures are included in each development (i.e., the general principles of Crime Prevention Through Environmental Design [CPTED]) and would be required to pay all applicable required law enforcement mitigation fees associated with the project. Impacts would be less than significant.

- **Impact PUB-2:** *The project would not create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of new or physically altered school, library, or other public facilities in order to maintain acceptable service ratios or other performance objectives.*

Buildout of the FFTOS Specific Plan is calculated to generate approximately 5,570 total students, consisting of 2,664 elementary school students, 1,211 middle school students, and 1,695 high school students. Projects developed under the Specific Plan would pay SB 50 school impact fees to the Los Angeles Unified School District (LAUSD). For every new residential development in the Specific Plan Area, developer fees would be collected and contributed towards LAUSD's funds to construct new or expand existing school facilities. Such fees are defined as full and complete mitigation for the impact of development projects on school facilities. Furthermore, school capacity and impact fee payment pursuant to implementation of the FFTOD Specific Plan would be assessed on a project-by-project basis. Impacts would be less than significant.

Buildout of the FFTOD Specific Plan is calculated to create a need for an additional 21,259 square feet of facility space, 116,925 collection items, and 43 public access computers. To minimize the impact of residential projects on library services, Los

Angeles County Library collects a one-time Library Facilities Mitigation Fee from developers at the time building permits are requested for all new residential dwellings located within the unincorporated areas of Los Angeles County served by Los Angeles County Library. The FFTOD Specific Plan is located in the Library's Planning Area 5-Southeast which requires \$970 per dwelling unit. A calculated total of \$11,746,700 of developer fees would be collected for development projects under the FFTOD Specific Plan based on 12,110 additional residential units. Use of such fees by Los Angeles County Library for construction of new and/or expanded library facilities would reduce project impacts on library facilities in the FFTOD Specific Plan Area. Impacts would be less than significant.

12. Recreation

Finding: The proposed project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Draft EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact REC-1:** *The project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.*

Developers of residential units in the FFTOD Specific Plan Area would be required to provide the appropriate amount of parkland based on the proposed development size and allow public access to the parkland, or pay in-lieu fees that would go toward funding Los Angeles County acquisition of local park land or rehabilitation of existing recreational facilities. The FFTOD Specific Plan would also require developers provide publicly accessible open space based on the unit size or gross square feet depending on the development type.

As allowed by the Quimby Act and pursuant to the County Municipal Code, new residential subdivisions must dedicate parkland or pay in-lieu fees (or both, in some circumstances) to enable Los Angeles County to maintain a ratio of three acres of local parkland for every 1,000 residents (Section 21.24.340). This provision ensures that when new residential subdivisions are developed, there is an increase in parkland and/or funding for park improvement and/or development proportional to increases in population. Alternatively, developments would be required to be designed to incorporate open space in accordance with the requirements of the FFTOD Specific

Plan and Los Angeles County Title 22. Therefore, the impact would be less than significant.

- **Impact REC-2:** *The project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.*

It is likely that future developers of residential subdivisions in accordance with the FFTOD Specific Plan would pay in-lieu fees rather than provide new parkland to meet the Los Angeles County's local parkland standard, given the built-out nature of the FFTOD Specific Plan Area. In addition, there is no specific zone pertaining to park or open space use under the FFTOD Specific Plan. The FFTOD Specific Plan buildout would include pedestrian and bicycle infrastructure for mobility improvements. Pedestrian and bicycle infrastructure would be constructed in accordance with all relevant design standards and Los Angeles County Code. No other recreational facilities would be included under the FFTOD Specific Plan. The project would not require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. Therefore, the impact would be less than significant.

- **Impact REC-3:** *The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks.*

Any new residential projects developed under the FFTOD Specific Plan would be required to fulfill parkland obligations to provide local park space and/or pay park facilities mitigation fees to Los Angeles County. Use of such fees for construction of new and/or expanded park facilities would reduce project impacts on park facilities. Alternatively, developments would be required to be designed to incorporate open space in accordance with the requirements of the FFTOD Specific Plan. Therefore, the impact would be less than significant.

13. Transportation

Finding: The proposed project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially

lessen any significant environmental impacts under those thresholds. The Draft EIR evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact TRA-1:** *The project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.*

The FFTOD Specific Plan would not conflict with any programs, plans, ordinances, or policies addressing the circulation system, including public transit, roadway, bicycle, or pedestrian facilities. Consistency analysis of the FFTOD Specific Plan with key guiding policy documents (i.e., Connect SoCal, the FFCP, the Los Angeles County General Plan Mobility Element, the Los Angeles County Bicycle Master Plan, and Step by Step Los Angeles County), which set the long-term direction of land use development and transportation in the region and for the Florence-Firestone community, is provided in Section 3.14 Transportation of the Draft EIR. This impact would be less than significant.

- **Impact TRA-2:** *The project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).*

The FFTOD Specific Plan Scenario was analyzed using the SCAG 2016 RTP/SCS Travel Demand Forecast Model. Based on the results of the model analysis, the FFTOD Specific Plan scenario would have an average daily VMT per service population of 20.3, or 33 percent below the 2020 South County Baseline. The study area demonstrates relative efficiency in terms of daily VMT per service population, compared to the Los Angeles County's South County Planning Area. The changes included in the FFTOD Specific Plan will further expand the ability for residents and employees to walk, bike, and take transit to complete the trips they need to make, resulting in greater VMT efficiency in terms of daily VMT per service population. These transportation and mobility improvements are included as project design features, but the Travel Demand Forecast Model is not sensitive to these improvements and therefore the VMT estimates do not reflect the actual VMT reduction benefits they may have. Overall, the FFTOD Specific Plan would not conflict with CEQA Guidelines section 15064.3, subdivision (b) related to VMT thresholds. This impact would be less than significant.

- **Impact TRA-3:** *The project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).*

The FFTOD Specific Plan does not propose any new roads or intersections. None of the transportation system improvements envisioned in the FFTOD Specific Plan would introduce new safety hazards or incompatible uses at intersections or along roadway segments, because most would be designed to improve safe circulation and access to the transit stations for all users. In addition, any new transportation facilities or improvements to facilities associated with the FFTOD Specific Plan would be constructed based on environmental analysis as well as future engineering review consistent with applicable Los Angeles County guidelines and practices, including—but not limited to—the California Manual on Uniform Traffic Control Devices, Caltrans Highway Design Manual, Los Angeles County Municipal Code, and best practices consistent with the Los Angeles County General Plan. Overall, the FFTOD Specific Plan would not substantially increase hazards due to geometric design features (such as sharp curves or dangerous intersections) or incompatible uses. Impacts would be less than significant.

- **Impact TRA-4:** *The project would not result in inadequate emergency access.*

For the FFTOD Specific Plan Area, Los Angeles County will maintain a current evacuation plan; ensure that new and infill development is provided with adequate emergency and/or secondary access; require visible street name signage; and provide directional signage to freeways at key intersections to assist in emergency evacuation operations. In addition, Los Angeles County and responsible emergency service agencies including the Los Angeles County Fire Department have emergency access and design standards that are based on the size and intensity of development. At the project level, design would meet all applicable emergency access and design standards and adequate emergency access would be provided. It is possible that during the construction phase of transportation or mobility projects, the presence of construction equipment and materials adjacent to roadways could temporarily impede emergency access to and within the FFTOD Specific Plan Area. Final transportation and mobility improvements are not anticipated to result in inadequate emergency access, and any effects on emergency access would be temporary in nature. Impacts would be less than significant.

14. Utilities and Service Systems

Finding: The proposed project would have a less than significant direct, indirect, and cumulative impact on the below listed thresholds of significance. Accordingly, no changes or alterations to the proposed project were required to avoid or substantially lessen any significant environmental impacts under those thresholds. The Draft EIR

evaluated the following impacts and found that no mitigation was required for the identified reasons:

- **Impact USS-4:** *The project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.*

In 2014, the Los Angeles County Board of Supervisors adopted a Roadmap to a Sustainable Waste Management Future program. This roadmap outlines the process by which Los Angeles County can implement strategies to reduce solid waste generation in unincorporated areas and through Los Angeles County operations. The Florence-Firestone community is part of this program, which includes goals of reducing solid waste destined for landfills by 80 percent by 2030 and 95 percent by 2040. Therefore, impacts would be less than significant.

- **Impact USS-5:** *The project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste.*

All solid waste-generating activities in Los Angeles County are subject to the requirements set forth in AB 939, which requires diversion of a minimum of 50 percent of construction and demolition debris. In addition, after 2020, development projects pursuant to the FFTOD Specific Plan will be required to divert 75 percent of solid waste pursuant to AB 341. Additionally, the Florence-Firestone community is part of the Los Angeles County Roadmap to a Sustainable Waste Management Future program, which includes goals of reducing solid waste destined for landfills by 80 percent by 2030 and 95 percent by 2040. Therefore, existing landfills would be able to accommodate solid waste generated by buildout of the FFTOD Specific Plan and impacts to solid waste management facilities would be less than significant. Disposal of waste generated from implementation of the FFTOD Specific Plan would be consistent with all state regulations and the policies in the Los Angeles County Integrated Waste Management Plan. Impacts would be less than significant.

4.2 IMPACTS MITIGATED TO LESS THAN SIGNIFICANT

Los Angeles County finds that the following environmental impacts can and will be mitigated to below a level of significance based upon the implementation of the mitigation measures in the Final EIR. These findings are based on the discussion of impacts in the detailed issue area analyses and cumulative impacts in Chapter 3 Environmental Analysis of the Draft EIR. An explanation of the rationale for each finding is presented below.

1. Air Quality

Impact AQ-3: *The project would expose sensitive receptors to substantial pollutant concentrations.*

As discussed in Section 3.2 Air Quality of the Draft EIR criteria air pollutant emissions associated with construction and operation of the FFTOD Specific Plan have the potential to exceed the SCAQMD thresholds of significance. Because implementation of the FFTOD Specific Plan would result in exceedances of the SCAQMD reactive organic gasses (ROG) and nitrogen oxides (NO_x) thresholds for construction and/or operation, the FFTOD Specific Plan could contribute to regional health effects associated with ozone, NO_x and nitrogen dioxide (NO₂), and particulate matter (PM) emissions. However, the nature of criteria pollutants is such that the emissions from an individual project cannot be directly identified as responsible for health impacts within any specific geographic location. As a result, attributing health risks at any specific geographic location to a single proposed project is not feasible. The SCAQMD has established conservative screening criteria (based on site-specific information) that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance thresholds (LSTs) and therefore not cause or contribute to an exceedance of the applicable ambient air quality standards without project-specific dispersion modeling. An LST analysis can only be conducted at a project level, and quantification of LSTs is not applicable for this program-level environmental analysis. Because potential redevelopment could occur close to existing sensitive receptors, the development that would be accommodated by the FFTOD Specific Plan has the potential to expose sensitive receptors to substantial pollutant concentrations of criteria pollutants. Therefore, this impact is potentially significant.

Additionally, heavy-duty construction equipment, haul trucks, on-site generators, and construction worker vehicles associated with construction could generate diesel PM (DPM), which the CARB has identified as a toxic air contaminant (TAC). The exact duration and location of construction for development within the FFTOD Specific Plan Area with respect to sensitive receptors cannot be determined at the time of the program-level analysis. Therefore, it is conservatively assumed that certain construction activities would result in the exposure of sensitive receptors to substantial TAC concentrations. Similarly, due to uncertainty associated with specific development within each land use type identified within the FFTOD Specific Plan, it is possible that development within the FFTOD Specific Plan Area could generate substantial TAC emissions as a result of long-term operations. It is also possible that sensitive receptors could be located at distances from stationary sources that would expose them to substantial TAC concentrations. Therefore, this impact is considered potentially significant.

Mitigation Measures

Implementation of Programmatic Mitigation Measures MM AQ-1 through MM AQ-7 would reduce impacts related to substantial pollutant concentrations to a less than significant level. Emissions would be substantially reduced as a result of implementation of MM AQ-1 through MM AQ-3 and MM AQ-7. Implementation of MM AQ-4 would ensure that future development that could generate localized emissions during construction and operations would evaluate and mitigate emissions to ensure that sensitive receptors are not exposed to substantial localized concentrations. This evaluation and mitigation design is only possible once project-specific details such as project site size and the sensitive receptors are known. MM AQ-1, MM AQ-5, and MM AQ-6 would reduce impacts to sensitive receptors associated with construction-related mobile emissions from construction equipment and operational TAC sources. In addition, implementation of MM AQ-6 would ensure that future development that could generate TAC emissions during construction and operations would evaluate and mitigate TAC emissions to ensure that sensitive receptors are not exposed to substantial TAC concentrations. This evaluation and mitigation design is only possible once project-specific details such as project site size and the sensitive receptors are known.

MM AQ-1 Applicants for future development projects pursuant to implementation of the FFTOD Specific Plan shall require the construction contractor to use equipment that meets the US Environmental Protection Agency (EPA) Tier 4 Final emissions standards for off-road diesel-powered construction equipment with more than 50 horsepower, unless it can be demonstrated to Los Angeles County that such equipment is not available. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 4 diesel emissions control strategy for a similarly sized engine, as defined by the California Air Resources Board's regulations.

Prior to issuance of a building permit, the project engineer shall ensure that all demolition and grading plans clearly show the requirement for EPA Tier 4 Final or higher emissions standards for construction equipment over 50 horsepower. During construction, the construction contractor shall maintain a list of all operating equipment in use on the construction site for verification by Los Angeles County. The construction equipment list shall state the makes, models, and numbers of construction equipment onsite. Equipment shall be properly serviced and maintained in accordance with the manufacturer's recommendations. In the event that the Lead Agency finds that Tier 4 construction equipment is not feasible pursuant to CEQA Guidelines Section 15364, the Project

representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is reviewed and approved by the Lead Agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, Tier 3 construction equipment, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the Proposed Project, and/or limiting the number of individual construction project phases occurring simultaneously, if applicable.

Construction contractors shall also ensure that all nonessential idling of construction equipment is restricted to 5 minutes or less in compliance with California Air Resources Board's Rule 2449.

MM AQ-2

Applicants for future development projects pursuant to implementation of the FFTOD Specific Plan shall require the construction contractor to implement the requirements for fugitive dust control under South Coast Air Quality Management District (SCAQMD) Rule 403 to reduce PM₁₀ and PM_{2.5} emissions. Los Angeles County shall verify that these measures have been implemented during normal construction site inspections.

- Following all grading activities, the construction contractor shall reestablish ground cover on the construction site through seeding and watering;
- During all construction activities, the construction contractor shall sweep streets with SCAQMD Rule 1186-compliant, PM₁₀-efficient vacuum units on a daily basis if silt is carried over to adjacent public thoroughfares or occurs as a result of hauling;
- During all construction activities, the construction contractor shall maintain a minimum 24-inch freeboard on trucks hauling dirt, sand, soil, or other loose materials and shall tarp materials with a fabric cover or other cover that achieves the same amount of protection;
- During all construction activities, the construction contractor shall water exposed ground surfaces and disturbed areas a minimum of every three hours on the construction site and a minimum of twice times per day; and
- During all construction activities, the construction contractor shall limit onsite vehicle speeds on unpaved roads to no more than 15 miles per hour.

MM AQ-3 Applicants for future development projects pursuant to implementation of the FFTOD Specific Plan shall require the construction contractor to use water-based or “super-compliant” low volatile organic compound (VOC) paints. Super-compliant low VOC paints shall be no more than 10 grams per liter (g/L) of VOC. Alternatively, the new development projects may use building materials, such as pre-painted materials that do not require the use of architectural coatings. Prior to issuance of a building permit, the project engineer shall ensure that all building plans clearly specify the use of water-based or “super-compliant” low VOC paints or materials that do not require the use of architectural coatings.

MM AQ-4 For future development projects that are one acre or larger, the applicant/developer shall provide modeling of the localized emissions (NO_x, CO, PM₁₀, and PM_{2.5}) associated with the maximum daily on-site construction and operational activities for the proposed development. If the modeling shows that emissions would exceed South Coast AQMD’s air quality CEQA localized thresholds for those emissions, as provided in Table 3.2-6 of this Program EIR, mitigation measures should be implemented to reduce these emissions to less than significant levels which may include, but not necessarily be limited to:

- Installing diesel particulate filters or implementing other CARB-verified diesel emission control strategies on all construction equipment to reduce diesel PM emissions;
- Using equipment during time when receptors are not present (e.g., when school is not in session or during nonschool hours, or when office buildings are unoccupied);
- Establishing staging areas for the construction equipment that are as far as possible from sensitive receptors;
- Communicating requirements through daily kick-off meetings and signage that off-road diesel equipment operators shut down their engines rather than idle for more than 5 minutes;
- Planning construction phasing to minimize overlapping construction activities (e.g., building construction and paving) so that future construction activities continue to move further away from occupied land uses;
- Use on-site cargo and material handling equipment that is the lowest emitting equipment available at the time of occupancy;

- Incorporating exhaust emission controls on mobile and/or stationary sources (e.g., filters, oxidizers);
- Implement measures and strategies included in the Assembly Bill 617 2020 Southeast Los Angeles Community Emissions Reduction Plan, or the most applicable plan at the time the project is proposed; and
- Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding air pollution concerns and complaints. The SCAQMD's phone number shall also be visible to ensure compliance with applicable regulations.

MM AQ-5 When applicable, new development that would result in substantial toxic air contaminant (TAC) emissions directly or indirectly (e.g., industrial sources) or that would expose sensitive receptors to substantial TAC concentrations (e.g., residential land uses located near existing TAC sources) shall implement California Air Resource Board's (CARB's) Air Quality and Land Use Handbook: A Community Health Perspective (Handbook) guidance concerning land use compatibility with regard to sources of TAC emissions, or CARB guidance as it may be updated in the future.

MM AQ-6 For future development projects with the potential to generate substantial TAC emissions or expose sensitive receptors to substantial TAC pollutant concentrations, Los Angeles County shall require a site-specific analysis for construction and/or operational activities, and appropriate mitigation, as necessary, to ensure that sensitive receptors are not exposed to substantial pollutant concentrations. In communication with the SCAQMD, Los Angeles County shall require, if necessary, a site-specific health risk analysis for operational activities to determine whether health risks attributable to future proposed projects in relation to proposed, planned, and/or existing sensitive receptors would exceed applicable thresholds of significance. Site-specific analysis may include screening level analysis, dispersion modeling, and/or a health risk assessment, consistent with applicable guidance from the SCAQMD. Analyses shall take into account regulatory requirements for proposed uses.

Los Angeles County shall require the project applicant(s) to identify and implement feasible mitigation measures to reduce any potentially significant effect and communicate with the SCAQMD to identify measures to reduce exposure of sensitive receptors to substantial pollutant concentrations to levels consistent with

thresholds recommended by the SCAQMD (Table 3.2-7 of this Program EIR) or as applicable at the time the project is proposed.

Agreed upon feasible mitigation actions shall be documented as a project condition of approval. If the results of analysis for the operational activities of any future development project within the FFTOD Specific Plan Area determine that the performance standard for this mitigation would be exceeded, actions shall be taken to reduce potential operational impacts which may include, but not necessarily be limited to:

- Locating air intakes and designing windows to reduce particulate matter exposure by, for example, not allowing windows facing the source to open;
- Providing electrification hook-ups for transport refrigeration units (TRUs) to avoid diesel-fueled TRUs continuing to operate at loading docks during loading and unloading operations;
- Requiring the TAC-generating activity (e.g., loading docks and idling activities) be located away from sensitive receptors and installing “No Idling” signs;
- Incorporating exhaust emission controls on mobile and/or stationary sources (e.g., filters, oxidizers);
- Develop and implement a dock management system at the time of occupancy to minimize on-site idling below regulatory limits and reduce non-critical idling;
- Require all on-site user owned and operated trucks with transportation refrigeration units to be capable of plugging into power at loading docks and require plug-in when at the loading dock;
- Use on-site cargo and material handling equipment that is the lowest emitting equipment available at the time of occupancy;
- Evaluate the potential to electrify a portion of entirety of an on-site user-owned and operated truck fleet;
- Evaluate the potential to consolidate delivery or haul truck trips to increase the load and decrease vehicle trips;
- Provide building air filtration units with a Minimum Efficiency Reporting Value (MERV) that are adequate to address adjacent sensitive land uses according to performance standards of this mitigation measure;

- Ensure adequate distance between existing and planned sensitive receptors and gasoline dispensing facilities, based on the proposed size and design of any gasoline-dispensing facilities;
- Use vegetated buffers between substantial TAC-generating source locations and sensitive receptors;
- Implement measures and strategies included in the Assembly Bill 617 2020 Southeast Los Angeles Community Emissions Reduction Plan, or the most applicable plan at the time the project is proposed; and
- Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding air pollution concerns and complaints. The SCAQMD's phone number shall also be visible to ensure compliance with applicable regulations.

If analysis demonstrates that construction activities associated with development of FFTOD Specific Plan land uses or off-site improvement components would exceed the performance standards identified in this mitigation measure, actions shall be taken to reduce potential construction-related impacts which may include, but not necessarily be limited to:

- Installing diesel particulate filters or implementing other CARB-verified diesel emission control strategies on all construction equipment to reduce diesel PM emissions;
- Using equipment during time when receptors are not present (e.g., when school is not in session or during nonschool hours, or when office buildings are unoccupied);
- Establishing staging areas for the construction equipment that are as far as possible from sensitive receptors;
- Rerouting construction trucks away from congested streets or sensitive receptor areas;
- Communicating requirements through daily kick-off meetings and signage that off-road diesel equipment operators shut down their engines rather than idle for more than 5 minutes;
- Documenting that all off-road equipment is compliant with the CARB in-use off-road diesel vehicle regulation;
- Establishing an electrical supply to the construction site and use electric-powered equipment instead of diesel-powered equipment or generators, where feasible;

- Using haul trucks with on-road engines instead of off-road engines;
- Equipping nearby buildings with High Efficiency Particle Arresting (HEPA) filters systems at all mechanical air intake points to the building to reduce the levels of diesel PM that enter buildings;
- Planning construction phasing so that future construction activities continue to move further away from occupied land uses; and
- Planning construction phasing to complete mass site grading, which typically generates the largest portion of diesel PM emissions, prior to occupancy of the project site.

MM AQ-7 Prior to issuance of a building permit for new residential projects within the FFTOD Specific Plan, the property owner/developer shall show on the building plans that no fireplaces are included in the design of the dwelling units. Compliance would be ensured through Los Angeles County review prior to the issuance of a building permit.

Finding: Los Angeles County finds that changes or alterations have been incorporated into the project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Draft EIR. Los Angeles County, based on the Final EIR and the whole of the record that Programmatic Mitigation Measures MM AQ-1 through MM AQ-7 are feasible, finds that these mitigation measures will reduce the impacts related to substantial pollutant concentrations to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1).

2. Cultural Resources

Impact CUL-2: *The project may cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5.*

Future development projects pursuant to implementation of the FFTOD Specific Plan could impact known and unknown archaeological sites. Locations of archaeological sites and types of resources in each site are kept confidential due to their sensitive nature. The FFTOD Specific Plan Area is considered potentially sensitive for archaeological resources. Therefore, ground disturbance is considered to have a high potential for uncovering archaeological resources.

Mitigation Measures

Implementation of Programmatic Mitigation Measure MM CUL-2 would reduce impacts to archaeological resources to a less than significant level.

MM CUL-2: Avoidance, preservation, or data recovery shall be conducted for archaeological resources that could be affected by ground disturbing activities and are found to be significant resources. To ensure that future development projects in the FFTOD Specific Plan Area do not result in significant impacts to pre-historic or historic archaeological resources, the following shall be implemented.

Any ground disturbing activities such as installation of utilities, shall be subject to a Phase I cultural resources inventory on a project-specific basis prior to Los Angeles County' approval of project plans. The study shall be carried out by a qualified archaeologist, defined as an archaeologist meeting the SOI Standards for professional archaeology. The cultural resources inventory would consist of: a cultural resources records search to be conducted at the SCCIC; a Sacred Lands File Search by the NAHC and with interested Native Americans identified by the NAHC; a pedestrian archaeological survey where deemed appropriate by the archaeologist; and recordation of all identified archaeological resources on California Department of Parks and Recreation 523 forms. If potentially significant cultural resources are encountered during the survey, Los Angeles County shall require evaluation of the resources for their eligibility for listing in the CRHR and for significance as a historical resource or unique archaeological resource per CEQA Guidelines Section 15064.5. Recommendations shall be made for treatment of these resources if found to be significant. Per CEQA Guidelines Section 15126.4(b)(3), project redesign and preservation in place shall be the preferred means of mitigation to avoid impacts to significant cultural resources, including prehistoric and historic archaeological sites, locations of importance to Native Americans, human remains, historical buildings, structures and landscapes. Methods of avoidance may include, but shall not be limited to, project reroute or redesign, project cancellation, or identification of protection measures such as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be

avoided, the qualified archaeologist shall develop additional treatment measures, which may include data recovery or other appropriate measures, in consultation with LA County, and local Native American representatives expressing interest.

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

Finding: Los Angeles County finds that changes or alterations have been incorporated into the project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Draft EIR. Los Angeles County, based on the Final EIR and the whole of the record that Programmatic Mitigation Measure MM CUL-2 is feasible, finds that this mitigation measure will reduce the impact related to archaeological resources to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1).

Impact CUL-3: *The project may directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.*

Ground disturbance from future development projects pursuant to implementation of the FFTOD Specific Plan could damage fossils buried in soils. Abundant fossils occur in the older Quaternary alluvial deposits in the FFTOD Specific Plan Area. These deposits have produced numerous important fossil specimens. Therefore, the FFTOD Specific Plan Area contains significant, nonrenewable, paleontological resources that are considered to have high sensitivity.

Mitigation Measure

Implementation of Programmatic Mitigation Measure CUL-3 would reduce impacts to paleontological resources to a less than significant level.

MM CUL-3: Applicants for future development projects pursuant to the implementation of the FFTOD Specific Plan shall retain a qualified paleontologist (in accordance with the Society of Vertebrate Paleontologists) to monitor all ground-disturbing activities in native soils or sediments beginning at 5 feet below ground surface and deeper. If upon observing initial earthwork the paleontologist determines that there is low potential for discovery, no further action shall be required and the paleontologist shall submit a memo to Los Angeles County confirming findings of low potential. If upon observing initial earthwork the paleontologist determines there is a moderate to high potential for discovery, a qualified paleontologist or paleontological monitor (retained by Los Angeles County) shall monitor all mass grading and excavation activities. Monitoring will be conducted in areas of grading or excavation in undisturbed formation sediments, as well as where over-excavation of surficial alluvial sediments will encounter these formations in the subsurface. Paleontological monitors shall be equipped to salvage fossils as they are unearthed to avoid construction delays and to remove samples of sediment that are likely to contain the remains of small fossil invertebrates and vertebrates. The monitor must be empowered to temporarily halt or divert equipment to allow removal of abundant or large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface; or, if present, are determined on exposure and examination by

qualified paleontological personnel to have low potential to contain fossil resources.

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

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

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

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

Finding: Los Angeles County finds that changes or alterations have been incorporated into the project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Draft EIR. Los Angeles County, based on the Final EIR and the whole of the record that Programmatic Mitigation Measure MM CUL-3 is feasible, finds that this mitigation measure will reduce the impact related to paleontological resources to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1).

3. Greenhouse Gases

Impact GHG-1: *The project may generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.*

The amortized construction-related total and net increase of GHG emissions that are associated with the buildout of the FFTOD Specific Plan (i.e., 2.55 metric tons of carbon dioxide equivalent [MT CO₂e]) would exceed the local service population efficiency 2035 target of 2.36 MT CO₂e. Therefore, the FFTOD Specific Plan's cumulative contribution to the long-term GHG emissions in the state would be considered potentially significant.

Mitigation Measures

Implementation of Programmatic Mitigation Measure AQ-7 would reduce impacts related to greenhouse gases to a less than significant level.

MM AQ-7 Prior to issuance of a building permit for new residential projects within the FFTOD Specific Plan, the property owner/developer shall show on the building plans that no fireplaces are included in the design of the dwelling units. Compliance would be ensured through Los Angeles County review prior to the issuance of a building permit.

Finding: Los Angeles County finds that changes or alterations have been incorporated into the project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Draft EIR. Los Angeles County based on the Final EIR and the whole of the record that Programmatic Mitigation Measure MM AQ-7 is feasible, finds that this mitigation measure will reduce the impacts related to greenhouse gases to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1).

4. Hazards and Hazardous Materials

Impact HAZ-2: *The project may create a potentially significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.*

The demolition of buildings has the potential to expose and disturb asbestos containing materials (ACMs) and lead-based paint (LBP). Demolition can cause encapsulated ACMs (if present) to become friable; they are considered a carcinogen once airborne. Demolition of the existing buildings and structures can also release lead into the air if LBP is not properly removed and handled. Such releases could pose significant risks to people living and working in and around the project site as well as to project construction workers. Abatement of all ACM and LBP encountered during any future building demolition would be required to be conducted in accordance with all applicable laws and regulations, including those of the EPA (which regulates disposal), OSHA, U.S. Department of Housing and Urban Development, Cal/OSHA (which regulates employee exposure), and SCAQMD.

Cal/OSHA regulates the demolition, renovation, or construction of buildings involving lead-based materials. It includes requirements for the safe removal and disposal of lead, as well as the safe demolition of buildings containing LBP or other lead materials. In addition, during demolition, grading, and excavation, all construction workers would be required to comply with the requirements of CCR Title 8, Section 1532.1 (Lead), which establishes exposure limits, exposure monitoring, respiratory protection, and good working practice by workers exposed to lead. The potential exposure of construction workers to ACMs or LBP is a potentially significant impact.

Mitigation Measures

Implementation of Programmatic Mitigation Measure HAZ-1 would reduce impacts related to ACMs or LBP to a less than significant level.

MM HAZ-1 Prior to the issuance of a demolition permit, a survey shall be required to characterize the potential exposure and prevent the potential release of asbestos-containing materials (ACM) and lead-based paint (LBP) associated with individual future development projects pursuant to implementation of the FFTOD Specific Plan. Inspections and surveys shall be conducted by a licensed or certified lead inspector/assessor and by a California Certified Asbestos Consultant.

Finding: Los Angeles County finds that changes or alterations have been incorporated into the project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Draft EIR. Los Angeles County, based on the Final EIR and the whole of the record that Programmatic Mitigation Measure MM HAZ-1 is feasible, finds that this mitigation measure will reduce the impacts related to a release of hazardous materials into the environment to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1).

Impact HAZ-4: *The project may be situated on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 which may create a potentially significant hazard to the public or the environment as a result.*

Lists of hazardous materials sites found on lists compiled pursuant to Government Code Section 65962.5 that occur within or in the vicinity of the FFTOD Specific Plan Area are provided in Table 3.7-1 and Table 3.7-2 of the Draft EIR. A list of 116 sites within the FFTOD Specific Plan Area that have varying degrees of known contamination or reasons to investigate further is provided in Table 3.7-1. These sites include state response sites, voluntary cleanup sites, school investigation and cleanup sites, corrective action sites, and tiered California permit sites. The list also includes sites that are being investigated for suspected but unconfirmed contamination. A list of the 15 sites within the FFTOD Specific Plan Area that could affect groundwater quality is provided in Table 3.7-2. Future redevelopment of individual properties within the FFTOD Specific Plan Area could have unknown recognized environmental conditions related to soils, groundwater, and vapors/gases that could create a significant hazard to the public or the environment.

Mitigation Measures

Implementation of Programmatic Mitigation Measure HAZ-2 would reduce impacts related to hazardous materials sites to a less than significant level.

- MM HAZ-2** Applicants for future development projects on former or industrial sites, shall prepare and submit a Phase I Environmental Site Assessment (ESA) to Los Angeles County to identify environmental conditions of the development site and determine whether contamination is present. The Phase I ESA shall be prepared by an Environmental Professional in accordance with the American Society for Testing and Materials (ASTM) Standard E 1527.13, “Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.” If recognized environmental conditions related to soils or groundwater are identified in the Phase I ESA, the project applicant shall have soil and soil gas sampling performed, as required, as a part of a Phase II

ESA. If contamination is found at significant levels, the project applicant shall remediate all contaminated soils in accordance with state and local agency requirements and with the oversight of the California DTSC, RWQCB, LACoFD, etc. All contaminated soils and/or material encountered shall be disposed of at a regulated site and in accordance with applicable laws and regulations prior to the completion of grading.

Each Phase I ESA conducted for projects that involve demolition activities shall include an inspection for lead-based paint conducted by a licensed or certified lead inspector/assessor and a survey for asbestos-containing materials conducted by a California Certified Asbestos Consultant.

Prior to the issuance of building permits, a report documenting the completion, results, and follow-up remediation on the recommendations—if any—shall be provided to the Los Angeles County evidencing that all site remediation activities have been completed.

Finding: Los Angeles County finds that changes or alterations have been incorporated into the project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Draft EIR. The County based on the Final EIR and the whole of the record that Programmatic Mitigation Measure MM HAZ-2 is feasible, finds that this mitigation measure will reduce the impacts related to hazardous materials sites to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1).

5. Hydrology and Water Quality

Impact HWQ-5: *The project may substantially alter the existing drainage pattern of the site or area, including through the alteration of a federal 100-year flood hazard area or County Capital Flood floodplain; the alteration of the course of a stream or river; or through the addition of impervious surfaces, in a manner that would create or contribute to runoff water and exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.*

The FFTOD Specific Plan would not result in the generation of substantial sources of polluted runoff because the project would be required to comply with NPDES requirements, County Stormwater Pollution Control Requirements for Construction Activities, and the requirements of the County LID Standards Manual. However, although the FFTOD Specific Plan Area is completely developed, individual site-specific development project assessment would be required to address drainage and capacity needs, such that new development would not create or contribute to runoff water in excess of

capacity of stormwater drainage systems or provide substantial additional sources of polluted runoff.

Mitigation Measures

Implementation of Programmatic Mitigation Measure HYD-1 would reduce impacts to drainage capacity to a less than significant level.

MM HYD-1 Prior to the issuance of a grading permit for any future development project having a direct connection to Hooper Avenue Drain or that is tributary to Glen Avenue Drain, the project applicant/developer shall submit a site-specific infrastructure assessment for review and approval by Los Angeles County Public Works. The infrastructure assessment shall be sufficient for Los Angeles County Public Works to make the determination of whether drainage improvements or upgrades would be required as part of the development project. To assist in this determination, the site-specific infrastructure assessment shall include a detailed drainage analysis, including the consideration of drainage solutions (such as retention-based stormwater quality control measures on site or within public rights-of-way) that allow area drains to function within designed capacity, and/or system capacity improvements.

Finding: Los Angeles County finds that changes or alterations have been incorporated into the project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Draft EIR. Los Angeles County, based on the Final EIR and the whole of the record that Programmatic Mitigation Measure MM HYD-1 is feasible, finds that this mitigation measure will reduce the impacts related to drainage capacity to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1).

6. Noise

Impact NOI-1: *The project may result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.*

As future development projects pursuant to the implementation of the FFTOD Specific Plan are proposed adjacent to—and in the immediate vicinity of—the LA Metro A Line (Blue) Stations, the noise generated by trains traveling through the FFTOD Specific Plan

Area could, depending on distance, potentially expose new residential uses to excessive rail noise. The Federal Transit Authority (FTA)'s Screening Distance for Noise Assessments should be considered whenever siting these new uses in proximity to the rail alignment. For light rail transit, the screening distance for noise assessment is 350 feet for proposed construction with an unobstructed line of sight to the alignment and 175 feet for those with an obstructed line of sight. Because the FFTOD Specific Plan aims to focus residential development within these distances of existing LA Metro A Line stations, there is potential for the project to expose future noise-sensitive land uses to excessive noise levels and is thus potentially significant.

Mitigation Measures

Implementation of Programmatic Mitigation Measure NOI-1 would reduce impacts related to excessive noise to a less than significant level.

MM NOI-1 At the project level, future development projects pursuant to implementation of the FFTOD Specific Plan shall be required to execute the following actions when key scenarios have the potential to occur:

- Proposed single-family homes with exterior areas exposed to noise levels greater than 60 dBA, CNEL and multifamily residences with exterior areas exposed to noise levels greater than 65 dBA, CNEL shall incorporate noise mitigation in the form of setbacks, noise barriers, or other methods to achieve compliance with Los Angeles County' exterior noise standards.
- For future development projects without exterior use areas but expose exterior facades of noise-sensitive spaces to noise levels greater than 65 dBA, CNEL, project applicants shall demonstrate that the acoustic performance of the building shell meets or exceeds California Building Code requirements. Project applicants shall demonstrate compliance with the above through the preparation of an acoustical assessment.

Finding: Los Angeles County finds that changes or alterations have been incorporated into the project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Draft EIR. Los Angeles County, based on the Final EIR and the whole of the record that Programmatic Mitigation Measure MM NOI-1 is feasible, finds that this mitigation measure will reduce the impacts related to noise to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1).

Impact NOI-2: *The project may result in the generation of excessive groundborne vibration or groundborne noise levels.*

As future development projects would be spread over the FFTOD Specific Plan's 15-year build-out period and construction events are short-term in nature, it is anticipated that there would be an infrequent amount of vibration events at sensitive land use receptors. However, depending on how close an actual receptor location is to a construction site, the type of construction equipment and the type of receptor building (e.g., older residential buildings, modern commercial buildings), the vibration levels at a receptor location could exceed the vibration threshold for structural damage. As such, vibration impacts during construction associated with the FFTOD Specific Plan could be potentially significant.

Mitigation Measures

Implementation of Programmatic Mitigation Measure NOI-2 would reduce impacts related to vibration to a less than significant level.

MM NOI-2 At the project level, prior to the approval of a grading permit or building permit, operation of typical construction equipment (e.g., any equipment excluding impact pile drivers) shall be prohibited within 25 feet of receiving structures. If construction equipment is required within 25 feet of receiving structures, project applicants shall demonstrate vibration levels will not exceed 0.1 PPV in/sec at any occupied residential properties and 0.3 PPV in/sec at any existing structure (a limit which may be increased to 0.5 PPV in/sec for newer residential and modern commercial buildings). For any future development project that proposes construction activities within 25 feet of a structure, project applicants shall demonstrate compliance with the above through the preparation of a vibration assessment.

Finding: Los Angeles County finds that changes or alterations have been incorporated into the project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Draft EIR. Los Angeles County, based on the Final EIR and the whole of the record that Programmatic Mitigation Measure MM NOI-2 is feasible, finds that this mitigation measure will reduce the impacts related to vibration to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1).

7. Tribal Cultural Resources

Impact TCR-1: *The project may cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k).*

Impact TCR-2: *The project may cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1*

In accordance with AB 52 and SB 18 requirements, Los Angeles County sent invitation letters to representatives of the nine Native American contacts provided by the Native American Heritage Commission (NAHC) on March 11, 2021, formally inviting tribes to consult with Los Angeles County on the project. The intent of the consultations is to provide an opportunity for interested Native American contacts to work with Los Angeles County during the project planning process to identify and protect tribal cultural resources. Los Angeles County received two responses via email: one response from the Fernandeno Tatavium Band of Mission Indians noted that the FFTOD Specific Plan Area is outside the Fernandeno Tatavium Band of Mission Indians ancestral Tribal boundaries and deferred consultation for the Project to members of the Gabrieleno Indian Tribe; the other response, from the Gabrieleno Band of Mission Indians – Kizh Nation, declined to consult at the time because no immediate ground disturbance would be taking place; however the tribal contact requested to be notified regarding ground disturbance of future development projects. No other tribes responded to Los Angeles County's notification letter.

There are no known tribal cultural resources in the FFTOD Specific Plan Area, but ground-disturbing activities have the potential to cause a substantial adverse change in the significance of tribal cultural resources of a California Native American tribe. Each future development project in accordance with the FFTOD Specific Plan would be required to evaluate that project's impacts to site-specific tribal cultural resources as part of subsequent CEQA analysis, including tribal consultation with AB 52-specific Native American tribes (which would include follow up with the Gabrieleno Band of Mission Indians – Kizh Nation). Where significant impacts to tribal cultural resources are identified, future development projects would be required to either avoid impacts or implement feasible mitigation measures to reduce impacts.

Mitigation Measures

Implementation of Programmatic Mitigation Measures MM CUL-1 through MM CUL-3 would reduce impacts related to tribal cultural resources to less than significant levels.

MM CUL-1 For all future development projects pursuant to implementation of the FFTOD Specific Plan that involve ground disturbance and/or alteration of an existing structure, a historical resources assessment shall be performed by an architectural historian or historian meeting the Secretary of the Interior's (SOI's) Professional Qualification Standards (SOI Standards) to identify any historical resources that might be directly or indirectly affected. Assessments shall include a database search to determine if any resources potentially affected by the future development project have been designated or evaluated under federal or state designation programs or if any have been documented pursuant to a local historic resources survey effort. The qualified architectural historian or historian shall perform a reconnaissance- and/or intensive-level survey to identify any previously unrecorded potential historical resources that might be affected by the future development project. Surveys shall be performed in accordance with the Office of Historic Preservation guidelines and potential historical resources should be evaluated under a developed historic context, pursuant to the definition of an historical resource under CEQA.

The SOI Standards for the Treatment of Historic Properties will be used to the maximum extent practicable to ensure that future development projects involving the relocation, conversion, rehabilitation, or alteration of an historical resource and its settings or related new construction will not impair the significance of the historical resource. Use of the SOI Standards shall be overseen by an architectural historian or historic architect meeting the SOI Professional Qualification Standards. Evidence of compliance with the SOI Standards shall be provided to Los Angeles County in the form of a report identifying character-defining features and specifying how treatment of character-defining features and construction activities will conform to the SOI Standards.

While demolition or alteration of an historical resource such that its significance is materially impaired cannot be mitigated to a less-than-significant level, recordation of the resource will reduce significant adverse impacts to historical resources to the maximum extent feasible. Such recordation should be prepared under the supervision of an architectural historian or historian meeting the SOI

Professional Qualification Standards and should take the form of Historic American Buildings Survey (HABS) documentation. At a minimum, this recordation should include an architectural and historical narrative; medium- or large-format, black-and-white photographic documentation, including negatives and prints; and supplementary information, such as building plans and elevations and/or historic photographs. The documentation package should be reproduced on archival paper and should be made available to researchers and the public through accession by appropriate institutions such as libraries, the SCCIC, and/or the HABS collection housed in the Library of Congress.

MM CUL-2: Avoidance, preservation, or data recovery shall be conducted for archaeological resources that could be affected by ground disturbing activities and are found to be significant resources. To ensure that future development projects in the FFTOD Specific Plan Area do not result in significant impacts to pre-historic or historic archaeological resources, the following shall be implemented.

Any ground disturbing activities such as installation of utilities, shall be subject to a Phase I cultural resources inventory on a project-specific basis prior to Los Angeles County' approval of project plans. The study shall be carried out by a qualified archaeologist, defined as an archaeologist meeting the SOI Standards for professional archaeology. The cultural resources inventory would consist of: a cultural resources records search to be conducted at the SCCIC; a Sacred Lands File Search by the NAHC and with interested Native Americans identified by the NAHC; a pedestrian archaeological survey where deemed appropriate by the archaeologist; and recordation of all identified archaeological resources on California Department of Parks and Recreation 523 forms. If potentially significant cultural resources are encountered during the survey, Los Angeles County shall require evaluation of the resources for their eligibility for listing in the CRHR and for significance as a historical resource or unique archaeological resource per CEQA Guidelines Section 15064.5. Recommendations shall be made for treatment of these resources if found to be significant. Per CEQA Guidelines Section 15126.4(b)(3), project redesign and preservation in place shall be the preferred means of mitigation to avoid impacts to significant cultural resources,

including prehistoric and historic archaeological sites, locations of importance to Native Americans, human remains, historical buildings, structures and landscapes. Methods of avoidance may include, but shall not be limited to, project reroute or redesign, project cancellation, or identification of protection measures such as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures, which may include data recovery or other appropriate measures, in consultation with LA County, and local Native American representatives expressing interest.

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

MM CUL-3: Applicants for future development projects pursuant to the implementation of the FFTOD Specific Plan shall retain a qualified paleontologist (in accordance with the Society of Vertebrate

Paleontologists) to monitor all ground-disturbing activities in native soils or sediments beginning at 5 feet below ground surface and deeper. If upon observing initial earthwork the paleontologist determines that there is low potential for discovery, no further action shall be required and the paleontologist shall submit a memo to Los Angeles County confirming findings of low potential. If upon observing initial earthwork the paleontologist determines there is a moderate to high potential for discovery, a qualified paleontologist or paleontological monitor (retained by Los Angeles County) shall monitor all mass grading and excavation activities. Monitoring will be conducted in areas of grading or excavation in undisturbed formation sediments, as well as where over-excavation of surficial alluvial sediments will encounter these formations in the subsurface. Paleontological monitors shall be equipped to salvage fossils as they are unearthed to avoid construction delays and to remove samples of sediment that are likely to contain the remains of small fossil invertebrates and vertebrates. The monitor must be empowered to temporarily halt or divert equipment to allow removal of abundant or large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface; or, if present, are determined on exposure and examination by qualified paleontological personnel to have low potential to contain fossil resources.

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

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

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

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

Finding: Los Angeles County finds that changes or alterations have been incorporated into the project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Draft EIR. Los Angeles County, based on the Final EIR and the whole of the record that Programmatic Mitigation Measures MM CUL-1 through MM CUL-3 are feasible, finds that these mitigation measures will reduce the impacts related to tribal cultural resources to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1).

8. Utilities and Service Systems

Impact USS-1: *The project may require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects*

Any future development project having a direct connection to the sewer system would require a sewer analysis that is part of an individual infrastructure assessment to confirm the need for any upgrades. Additionally, any future development project having a direct connection to the Hooper Avenue Drain or that is tributary to the Glen Avenue Drain would

require a drainage analysis that is part of an individual infrastructure assessment to confirm the need for any upgrades. Also, new development or redevelopments would be responsible for upgrades and undergrounding of electrical transmission lines as determined by Southern California Edison (SCE) in coordination with California Public Utilities Commission (CPUC) and Los Angeles County Public Works after building plan submittal.

Mitigation Measures

Implementation of Programmatic Mitigation Measures MM USS-1 through MM USS-3 and MM HYD-1 would reduce impacts related to water supply, sewer, stormwater drainage, and electricity to less than significant levels.

MM USS-1 Prior to the issuance of a grading permit for mixed use parcels and medium density or higher residential parcels that include several buildings serviced by one meter location, the project applicant/developer shall submit a site-specific infrastructure assessment to confirm the efficacy of the infrastructure to meet the increased demand, in accordance with Golden State Water Company requirements, Los Angeles County development regulations, and the California Subdivision Map Act.

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

MM USS-2 Prior to the issuance of a grading permit for any future development project having a direct connection to any sewer, the project applicant/developer shall submit a site-specific infrastructure assessment for review and approval by the Los Angeles County Public Works. The infrastructure assessment shall be sufficient for Los Angeles County Public Works to make the determination of whether sewer improvements or upgrades would be required as part of the development project. To assist in this determination, the site-specific infrastructure assessment shall include a detailed sewer area analysis that addresses increased zoning density/intensity.

MM USS-3 New development or redevelopments pursuant to implementation of the FFTOD Specific Plan shall be responsible for upgrades and undergrounding of distribution lines as determined by SCE in coordination with Los Angeles County Public Works after building plan submittal. Underground electricity is more reliable, safer, and

more aesthetically pleasing. Ultimately, SCE and CPUC will determine which overhead sections will be relocated underground; electric supply and demand are generally determined on a case-by-case basis.

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

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

- Eliminate an unusually heavy concentration of overhead lines
- Involve a street or road with a high volume of public traffic
- Benefit a civic or public recreation area or area of unusual scenic interest
- Be listed as an arterial street or major collector as defined by the governor’s OPR Guidelines

Community and local governments determine these criteria through public hearings and consultation with the local utility. Full funding of an overhead distribution line to underground requires successful “public interest” determination, collection of enough Rule 20A work credits by the utility (including a possible 5-year “borrow forward” if required), and the creation of a utility underground district.

The following areas deserve some consideration for a Rule 20A undergrounding process:

- Gage Avenue—Strip mall development between Hooper Avenue and Compton Avenue resulted in removal of power lines from that section. Removing remaining overhead lines from this arterial would be a public benefit.
- Alameda Street—Entire length of major collector north of 92nd Street has overhead lines; Alameda serves as a gateway to the area from the east. Removal of overhead lines would be a public benefit.
- Hooper Avenue—Important thoroughfare from Slauson Avenue to Nadeau Street. Removal of overhead lines would greatly beautify and secure the western side of the FFTOD Specific Plan Area.

- Nadeau Street—There are overhead lines on this important central collector starting east of Holmes Avenue/Franklin D. Roosevelt Park. Removal of these lines would greatly improve the eastern half of the FFTOD Specific Plan Area.

MM HYD-1 Prior to the issuance of a grading permit for any future development project having a direct connection to Hooper Avenue Drain or that is tributary to Glen Avenue Drain, the project applicant/developer shall submit a site-specific infrastructure assessment for review and approval by Los Angeles County Public Works. The infrastructure assessment shall be sufficient for Los Angeles County Public Works to make the determination of whether drainage improvements or upgrades would be required as part of the development project. To assist in this determination, the site-specific infrastructure assessment shall include a detailed drainage analysis, including the consideration of drainage solutions (such as retention-based stormwater quality control measures on site or within public rights-of-way) that allow area drains to function within designed capacity, and/or system capacity improvements.

Finding: Los Angeles County finds that changes or alterations have been incorporated into the project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Draft EIR. Los Angeles County based on the Final EIR and the whole of the record that Programmatic Mitigation Measures MM USS-1 through MM USS-3 and MM HYD-1 are feasible, finds that these mitigation measures will reduce the impacts related to utilities and service systems to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1).

Impact USS-2: *The project may have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.*

While demand for water supply would increase, this anticipated increase would be slightly offset by decreased demand based on conversion of existing industrial uses to mixed use format development. Most of the existing water lines in the community generally have the capacity to handle the increase in water demand/load under build-out of the FFTOD Specific Plan. Increases in residential density would result in increased potential water usage including potable water and fire prevention demand. To service this, the water facility upgrades described in Section 3.16 Utilities and Service Systems of the Draft EIR would be recommended if increased density develops at the locations noted; all other installed water facilities appear to be sufficient for current and proposed buildout.

Mitigation Measures

Implementation of Programmatic Mitigation Measure MM USS-1 (listed above) would reduce impacts related to water supply to a less than significant level.

Finding: Los Angeles County finds that changes or alterations have been incorporated into the project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Draft EIR. Los Angeles County, based on the Final EIR and the whole of the record that Programmatic Mitigation Measure MM USS-1 is feasible, finds that this mitigation measure will reduce impacts related to water supply to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1).

Impact USS-3: *The project may result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments.*

A preliminary analysis was performed using available information that shows that the existing trunk sewers generally have sufficient capacity to convey wastewater from the proposed, full buildout condition. Several locations are exceptions that may require upgrading based on the level of density/intensity realized in the vicinity. Individual project applicants/developers would need to prepare a sewer analysis, that is part of an individual infrastructure assessment, and consult with Los Angeles County Public Works and Consolidated Sewer Maintenance District (CSMD) regarding future sewer facilities or upgrade considerations. The CSMD would evaluate all development that would occur and conduct its own site-specific analysis of changes to the service trunk and necessary sewer infrastructure upgrades. Additionally, new sewer laterals would be required for new buildings.

Mitigation Measures

Implementation of Programmatic Mitigation Measure USS-2 (listed above) would reduce impacts related to wastewater to a less than significant level.

Finding: Los Angeles County finds that changes or alterations have been incorporated into the project that mitigate potentially significant direct, indirect, and cumulative impacts on the environment, as identified in the Draft EIR. Los Angeles County based on the Final EIR and the whole of the record that Programmatic Mitigation Measure MM USS-2 is feasible, finds that this mitigation measure will reduce impacts related to wastewater to a less than significant level. [Pub. Res. Code §21081(a)(1); Guidelines § 15091(1).

4.3 SIGNIFICANT UNAVOIDABLE SIGNIFICANT ADVERSE IMPACTS

The following summary describes the unavoidable adverse impact of the proposed project where either mitigation measures were found to be infeasible, or mitigation would not lessen impacts to less than significant. The following impact would remain significant and unavoidable:

1. Air Quality

Impact AQ-1: *The project would conflict with or obstruct implementation of applicable air quality plans of either the South Coast AQMD (SCAQMD) or the Antelope Valley AQMD (AVAQMD).*

Despite furthering the regional transportation and planning objectives included within the RTP/SCS and air quality management plan (AQMP), the FFTOD Specific Plan would represent a substantial increase in emissions compared to existing conditions and would exceed SCAQMD's regional operational significance thresholds. As a result, the FFTOD Specific Plan could potentially exceed the assumptions in the AQMP and would not be considered consistent with the AQMP. Therefore, impacts related to conflicts with or obstructing implementation of applicable air quality plans of the SCAQMD would be potentially significant.

Mitigation Measure

Implementation of Programmatic Mitigation Measures MM AQ-1 through MM AQ-3 and MM AQ-7 would minimize criteria air pollutant emissions from construction and operation associated with implementation of the FFTOD Specific Plan, but emissions of criteria air pollutants and precursors could still exceed significance thresholds. There are no additional mitigation measures to reduce these air quality impacts to below a level of significance. Therefore, this impact is significant and unavoidable.

MM AQ-1 Applicants for future development projects pursuant to implementation of the FFTOD Specific Plan shall require the construction contractor to use equipment that meets the US Environmental Protection Agency (EPA) Tier 4 Final emissions standards for off-road diesel-powered construction equipment with more than 50 horsepower, unless it can be demonstrated to Los Angeles County that such equipment is not available. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 4 diesel emissions control strategy for a similarly sized engine, as defined by the California Air Resources Board's regulations.

Prior to issuance of a building permit, the project engineer shall ensure that all demolition and grading plans clearly show the requirement for EPA Tier 4 Final or higher emissions standards for construction equipment over 50 horsepower. During construction, the construction contractor shall maintain a list of all operating equipment in use on the construction site for verification by Los Angeles County. The construction equipment list shall state the makes, models, and numbers of construction equipment onsite. Equipment shall be properly serviced and maintained in accordance with the manufacturer's recommendations. In the event that the Lead Agency finds that Tier 4 construction equipment is not feasible pursuant to CEQA Guidelines Section 15364, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is reviewed and approved by the Lead Agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, Tier 3 construction equipment, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the Proposed Project, and/or limiting the number of individual construction project phases occurring simultaneously, if applicable.

Construction contractors shall also ensure that all nonessential idling of construction equipment is restricted to 5 minutes or less in compliance with California Air Resources Board's Rule 2449.

MM AQ-2 Applicants for future development projects pursuant to implementation of the FFTOD Specific Plan shall require the construction contractor to implement the requirements for fugitive dust control under South Coast Air Quality Management District (SCAQMD) Rule 403 to reduce PM₁₀ and PM_{2.5} emissions. Los Angeles County shall verify that these measures have been implemented during normal construction site inspections.

- Following all grading activities, the construction contractor shall reestablish ground cover on the construction site through seeding and watering;
- During all construction activities, the construction contractor shall sweep streets with SCAQMD Rule 1186-compliant, PM₁₀-efficient vacuum units on a daily basis if silt is carried over to adjacent public thoroughfares or occurs as a result of hauling;
- During all construction activities, the construction contractor shall maintain a minimum 24-inch freeboard on trucks hauling

dirt, sand, soil, or other loose materials and shall tarp materials with a fabric cover or other cover that achieves the same amount of protection;

- During all construction activities, the construction contractor shall water exposed ground surfaces and disturbed areas a minimum of every three hours on the construction site and a minimum of twice times per day; and
- During all construction activities, the construction contractor shall limit onsite vehicle speeds on unpaved roads to no more than 15 miles per hour.

MM AQ-3 Applicants for future development projects pursuant to implementation of the FFTOD Specific Plan shall require the construction contractor to use water-based or “super-compliant” low volatile organic compound (VOC) paints. Super-compliant low VOC paints shall be no more than 10 grams per liter (g/L) of VOC. Alternatively, the new development projects may use building materials, such as pre-painted materials that do not require the use of architectural coatings. Prior to issuance of a building permit, the project engineer shall ensure that all building plans clearly specify the use of water-based or “super-compliant” low VOC paints or materials that do not require the use of architectural coatings.

MM AQ-7 Prior to issuance of a building permit for new residential projects within the FFTOD Specific Plan, the property owner/developer shall show on the building plans that no fireplaces are included in the design of the dwelling units. Compliance would be ensured through Los Angeles County review prior to the issuance of a building permit.

Finding: Implementation of Programmatic Mitigation Measures MM AQ-1 through MM AQ-3 and MM AQ-7 would minimize criteria air pollutant emissions from construction and operation associated with implementation of the FFTOD Specific Plan, but emissions of criteria air pollutants and precursors could still exceed significance thresholds. There are no additional mitigation measures to reduce these air quality impacts to below a level of significance. Impact AQ-1 would remain significant and unavoidable and a Statement of Overriding Considerations is required.

Impact AQ-2: *The project would result in a cumulatively considerable net increase of criteria pollutants (VOC, NOx, PM10, and PM 2.5) for which the project region is nonattainment (O3) under an applicable federal or state ambient air quality standard.*

Construction activities associated with the FFTOD Specific Plan could potentially exceed the SCAQMD regional thresholds for volatile organic compounds (VOC), NOx, particulate matter with a diameter of 10 microns or less (PM₁₀), and particulate matter with a diameter of 2.5 microns or less (PM_{2.5}). Additionally, the operational phase of the FFTOD Specific Plan at buildout (and potentially overlapping construction and operational activities) would generate air pollutant emissions that exceed SCAQMD's regional significance thresholds for all criteria air pollutant emissions, except sulfur oxides (SO_x). Emissions of VOC, NOx, carbon monoxide (CO), PM₁₀, and PM_{2.5} that exceed the SCAQMD regional threshold would cumulatively contribute to the ozone, PM₁₀, and PM_{2.5} nonattainment designation of the Southern California Air Basin (SCAB).

While buildout of the FFTOD Specific Plan would be consistent with regional and land use planning strategies to reduce VMT which would reduce overall operational emissions, emissions associated with construction and operation of future development of the FFTOD Specific Plan could exceed or contribute substantially to an existing or projected air quality violation. Therefore, implementation of the FFTOD Specific Plan would result in a significant impact because it would significantly contribute to the nonattainment designations of the SCAB. This impact would be potentially significant.

Mitigation Measures

Implementation of Programmatic Mitigation Measures MM AQ-1 through MM AQ-3 and MM AQ-7 (listed above) would minimize criteria air pollutant emissions from construction and operation associated with implementation of the FFTOD Specific Plan. Implementation of MM AQ-1 through MM AQ-3 would substantially reduce PM and ozone precursor emissions to levels below the SCAQMD thresholds of significance; however, emissions estimates of the overlapping construction and operational activities would continue to exceed the SCAQMD thresholds of significance. Therefore, it is conservatively assumed that construction-related emissions could exceed significance thresholds and, this impact is significant and unavoidable. Implementation of MM AQ-7 would ban fireplaces in new residential development, and thereby reduce operational emissions of VOC, NOx, and PM. Mitigated emissions are substantially reduced compared to the unmitigated estimates. However, although implementation of the FFTOD Specific Plan would be consistent with regional and land use planning strategies to reduce VMT which would reduce overall operational emissions emission estimates, the operational emissions would continue to exceed the SCAQMD thresholds of significance. In addition, because the specific development projects within the FFTOD Specific Plan Area cannot be

defined at the time of this analysis, precise effectiveness and feasibility of additional measures cannot be determined for individual future projects, and operational emissions of criteria air pollutants and precursors could still exceed significance thresholds. There are no additional feasible mitigation measures available to address this impact. Therefore, this impact is significant and unavoidable.

Finding: Implementation of Programmatic Mitigation Measures MM AQ-1 through MM AQ-3 and MM AQ-7 would minimize criteria air pollutant emissions from construction and operation associated with implementation of the FFTOD Specific Plan, but emissions of criteria air pollutants and precursors could still exceed significance thresholds. There are no additional feasible mitigation measures to reduce these air quality impacts to below a level of significance. Impact AQ-2 would remain significant and unavoidable and a Statement of Overriding Considerations is required.

2. **Cultural Resources**

Impact CUL-1: *The project may potentially cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5.*

Identified historic structures and sites that are eligible or potentially eligible for National Register of Historic Places (NRHP) listing may be vulnerable to future development projects pursuant to implementation of the FFTOD Specific Plan. For example, redevelopment to enable a different or more intensive use of a site could result in the demolition of historic or potentially historic structures. In addition, infrastructure or other improvements could result in damage to or demolition of other historic features. Furthermore, there may be other potential resources that have not been identified, researched, or evaluated for historical significance as defined in CEQA. Therefore, future development projects could adversely affect historic resources that could result in substantial adverse changes in the significance of historical resources so that they would no longer be eligible. Therefore, impacts to historical resources are potentially significant.

In addition to the historic resources identified in the Draft EIR, there are numerous other residential and commercial buildings within the FFTOD Specific Plan Area that are older than 50 years (or could reach 50 years and become worthy of consideration during the planning period for the FFTOD Specific Plan). As these structures have not been comprehensively surveyed and evaluated, it is possible that they may be eligible as historic resources if other criteria apply, such as significant associations with important events, people, or have high architectural merit. Therefore, future development projects pursuant to implementation of the FFTOD Specific Plan could adversely affect other historical resources not identified in the Draft EIR. The impact to a historical resource is considered significant.

Mitigation Measures

Implementation of Programmatic Mitigation Measure MM CUL-1 would mitigate potential impacts to historical resources to the greatest extent practicable but affords only limited protection to historic structures and would not ultimately prevent the demolition of a historic structure if preservation is determined to be infeasible. The determination of feasibility will occur on a case by case basis as future development applications on sites containing historic structures are submitted. While policies would minimize the probability of historic structures being demolished, these policies cannot ensure that the demolition of a historic structure would not occur. There are no additional mitigation measures to reduce this impact to historical resources to below a level of significance. This is considered a significant unavoidable adverse impact.

MM CUL-1 For all future development projects pursuant to implementation of the FFTOD Specific Plan that involve ground disturbance and/or alteration of an existing structure, a historical resources assessment shall be performed by an architectural historian or historian meeting the Secretary of the Interior's (SOI's) Professional Qualification Standards (SOI Standards) to identify any historical resources that might be directly or indirectly affected. Assessments shall include a database search to determine if any resources potentially affected by the future development project have been designated or evaluated under federal or state designation programs or if any have been documented pursuant to a local historic resources survey effort. The qualified architectural historian or historian shall perform a reconnaissance- and/or intensive-level survey to identify any previously unrecorded potential historical resources that might be affected by the future development project. Surveys shall be performed in accordance with the Office of Historic Preservation guidelines and potential historical resources should be evaluated under a developed historic context, pursuant to the definition of an historical resource under CEQA.

The SOI Standards for the Treatment of Historic Properties will be used to the maximum extent practicable to ensure that future development projects involving the relocation, conversion, rehabilitation, or alteration of an historical resource and its settings or related new construction will not impair the significance of the historical resource. Use of the SOI Standards shall be overseen by an architectural historian or historic architect meeting the SOI Professional Qualification Standards. Evidence of compliance with the SOI Standards shall be provided to Los Angeles County in the form of a report identifying character-defining features and

specifying how treatment of character-defining features and construction activities will conform to the SOI Standards.

While demolition or alteration of an historical resource such that its significance is materially impaired cannot be mitigated to a less-than-significant level, recordation of the resource will reduce significant adverse impacts to historical resources to the maximum extent feasible. Such recordation should be prepared under the supervision of an architectural historian or historian meeting the SOI Professional Qualification Standards and should take the form of Historic American Buildings Survey (HABS) documentation. At a minimum, this recordation should include an architectural and historical narrative; medium- or large-format, black-and-white photographic documentation, including negatives and prints; and supplementary information, such as building plans and elevations and/or historic photographs. The documentation package should be reproduced on archival paper and should be made available to researchers and the public through accession by appropriate institutions such as libraries, the SCCIC, and/or the HABS collection housed in the Library of Congress.

Finding: Implementation of Programmatic Mitigation Measure MM CUL-1 would mitigate potential impacts to historical resources to the greatest extent practicable but affords only limited protection to historic structures and would not ultimately prevent the demolition of a historic structure if preservation is determined to be infeasible. The determination of feasibility will occur on a case by case basis as future development applications on sites containing historic structures are submitted. There are no additional mitigation measures to reduce this impact to historical resources to below a level of significance. Impact CUL-1 would remain significant and unavoidable and a Statement of Overriding Considerations is required.

5.0 ALTERNATIVES TO THE PROPOSED PROJECTS

5.1 ALTERNATIVES CONSIDERED AND WITHDRAWN

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project. The key question and first step in the analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (CEQA Guidelines Section 15126[5][B][1]). In general, any development of the size and type proposed by the project would have substantially the same impacts on air quality, greenhouse gas emissions, land use and planning, noise, population and housing, public services, recreation, transportation, and utilities and service systems. Without a site specific analysis, impacts on aesthetics, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, and tribal cultural resources cannot be evaluated. Therefore, another location would not avoid or substantially lessen the effects of the proposed project.

As part of the Los Angeles County General Plan Update, Los Angeles County identified several urban and suburban areas with access to major transit and commercial corridors as priority policy areas for infill development. Alternative sites were not selected for evaluation because the primary purpose of the project is to implement the Los Angeles County General Plan 2035 TOD Program, which is intended to focus on the area within a 0.5-mile radius of transit stations. In the Florence-Firestone community, there are three LA Metro A Line Stations (the Slauson, Florence, and Firestone Stations) and the purpose of the project cannot be met by focusing on alternative sites. The FFTOD Specific Plan Area was identified as one of the priority areas for the TOD Program as it is well suited for higher density housing and a mix of uses surrounding existing major commercial, employment, and civic activity nodes served by high-quality transit. The Specific Plan can leverage the community of Florence-Firestone's assets, connecting uses and activities, and attracting future investment. The LA Metro Stations' (Slauson, Florence, and Firestone Stations) proximity to major job centers and regional destinations spanning downtown Los Angeles to Long Beach creates many opportunities for improving the built environment and overall community that other locations would not be able to provide.

Overall, the purpose of the FFTOD Specific Plan is to create a land use and zoning policy tool to enable more opportunities for affordable housing, encourage transit oriented development and promote active transportation, improve access to the three LA Metro A (Blue) Line Stations, and reduce vehicle miles traveled by cars. The Specific Plan development standards and strategies are designed to balance TOD development with community benefits that support a wide range of residents, workers, and small business owners. The land use and mobility concepts focus on improving the connection between the community and the three LA Metro transit stations.

Finding: Los Angeles County finds that an alternative location for the proposed project is infeasible and/or would not meet most project objectives, for the reasons detailed in Section 4.0 Alternatives of the Draft EIR.

5.2 ALTERNATIVES FURTHER EVALUATED

The Draft EIR analyzed the following three alternatives:

- Alternative 1: No Project/Development in Accordance with Existing Zoning
- Alternative 2: Firestone TOD Modified Land Use
- Alternative 3: Slauson TOD Focused

Community-wide information regarding dwelling units, population, population per household, nonresidential square footage, and employment projections for each of the alternatives is provided in Table 5.2-1

Table 5.2-1: FFTOD Specific Plan Area Future Condition (2035)

	Units (Households)	Population	Population / Household	Nonresidential Square Feet	Total Employment
Proposed Project	25,532	100,423	3.9	1,497,753	11,408
Alternative 1: No Project/Development in Accordance with Existing Zoning	14,911	66,072	4.4	2,061,510	9,591
Alternative 2: Firestone TOD Modified Land Use	25,596	101,308	4.0	1,546,348	11,520
Alternative 3: Slauson TOD Focused	22,848	91,253	4.0	1,169,894	10,651

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

As presented in Section 4.0 Alternatives of the Draft EIR, Alternative 1 would reduce impacts to public services, recreation, and utilities and service systems. Impacts to transportation would be greater and impacts to aesthetics, air quality, cultural resources, energy, geology and soils, greenhouse gases, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, and tribal cultural resources would be similar. Significant and unavoidable impacts to air quality and historical resources would remain. The alternative would result in an additional significant and unavoidable impact related to the conflict with programs, plans, ordinance, or policy addressing the circulation system.

The implementation of this alternative would result in less environmental impacts compared to the proposed project and would not be able to achieve as many of the project objectives as the FFTOD Specific Plan. This alternative would not result in changes to existing zoning or meet the objectives of enabling more opportunities for affordable housing, encourage transit oriented development and promote active transportation, improve access to the three LA Metro A (Blue) Line Stations (Slauson, Florence, and Firestone), or reduce vehicle miles traveled because these improvements would not be comprehensively and cohesively implemented in accordance with a uniform design guideline such as the proposed FFTOD Specific Plan.

Finding: Los Angeles County finds that Alternative 1: No Project/Development in Accordance with Existing Zoning, is infeasible because although it would result in less environmental impacts compared to the proposed project for a number of environmental resource categories, it would result in an additional significant and unavoidable impact related to the conflict with programs, plans, ordinance, or policy addressing the circulation system and it would meet fewer of the project objectives and would not realize all the benefits of implementation of the proposed project.

In making this determination, Los Angeles County finds that when compared to the alternatives described and evaluated in the Draft EIR, the proposed project, as mitigated, provides a reasonable balance between satisfying the project objectives and reducing potential environmental impacts to an acceptable level.

2. Alternative 2: Firestone TOD Modified Land Use

As presented in Section 4.0 Alternatives of the Draft EIR, Alternative 2 would not reduce any impacts and would have greater impacts to air quality, greenhouse gases, noise, recreation, and utilities and service systems. Impacts to aesthetics, cultural resources, energy, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, population and housing, public services, transportation, and tribal cultural resources would be similar. Significant and unavoidable impacts to air quality and historical resources would remain.

The implementation of this Alternative would result in slightly greater environmental impacts compared to the proposed project. This Alternative would meet all of the objectives of the proposed project including the provision of a transit-oriented development in the project area and provision of an attractive environment for pedestrian, bicyclists, LA Metro riders, and local transit users through streetscape improvements and would allow for expanded density through the implementation of RLM-2 and RM zoning in the Firestone TOD south of Nadeau Street.

Finding: Los Angeles County finds that Alternative 2: Firestone TOD Modified Land Use, is infeasible because it would result in slightly greater environmental impacts compared to the proposed project.

In making this determination, Los Angeles County finds that when compared to the alternatives described and evaluated in the Draft EIR, the proposed project, as mitigated, provides a reasonable balance between satisfying the project objectives and reducing potential environmental impacts to an acceptable level.

3. Alternative 3: Slauson TOD Focused

As presented in Section 4.0 Alternatives of the Draft EIR, Alternative 3 would reduce impacts to air quality, cultural resources, greenhouse gases, noise, public services, recreation, and utilities and service systems. Alternative 3 would not have any impacts greater than the proposed project. Impacts to aesthetics, energy, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, population and housing, transportation, and tribal cultural resources would be similar. Significant and unavoidable impacts to air quality and historical resources would remain but be reduced compared to the proposed project.

The implementation of this Alternative would result in less environmental impacts compared to the proposed project. Alternative 3 would limit all land use and zoning changes of the proposed FFTOD Specific Plan to the Slauson TOD area and rezoning to implement the Housing Element Update RHNA sites. This Alternative would meet most of the objectives of providing a transit oriented development in the FFTOD Specific Plan Area and providing an attractive environment for pedestrian, bicyclists, LA Metro riders, and local transit users through streetscape improvements.

Finding: Los Angeles County finds that Alternative 3: Slauson TOD Focused, is infeasible because although it is environmentally superior to the proposed project, it would meet fewer of the project objectives and would not realize all the benefits of implementation of the proposed project.

In making this determination, Los Angeles County finds that when compared to the alternatives described and evaluated in the Draft EIR, the proposed project, as mitigated, provides a reasonable balance between satisfying the project objectives and reducing potential environmental impacts to an acceptable level.

6.0 STATEMENT OF OVERRIDING CONSIDERATIONS

CEQA requires decision makers to balance the benefits of the proposed project against its unavoidable environmental risks when determining whether to approve the project. If the benefits of the project outweigh the unavoidable adverse effects, those effects may be considered “acceptable” (State CEQA Guidelines Section 15093[a]). CEQA requires the agency to support, in writing, the specific reasons for considering a project acceptable when significant impacts are infeasible to mitigate. Such reasons must be based on substantial evidence in the Final EIR or elsewhere in the administrative record (State CEQA Guidelines Section 15093 [b]). The agency’s statement is referred to as a “Statement of Overriding Considerations.” The following sections provide a description of the project’s significant and unavoidable adverse impacts and the justification for adopting a statement of overriding considerations.

6.1 SIGNIFICANT AND UNAVOIDABLE ADVERSE IMPACTS

Pursuant to Public Resources Code Section 21081(b) and Guidelines Section 15093, Los Angeles County has balanced the benefits of the proposed project against the following unavoidable adverse impacts associated with the proposed project and has adopted all feasible mitigation measures with respect to these impacts: (1) air quality; and (2) cultural resources. Los Angeles County also has examined alternatives to the proposed project, none of which both meets the project objectives to the same extent as the proposed project and is environmentally preferable to the proposed project.

Los Angeles County declares that it has adopted mitigation measures to reduce all of the proposed project's environmental impacts to an insignificant level, other than the following:

1. Air Quality

Impact AQ-1

Implementation of Programmatic Mitigation Measures MM AQ-1 through MM AQ-3 and MM AQ-7 would minimize criteria air pollutant emissions from construction and operation associated with implementation of the FFTOD Specific Plan. However, impact AQ-1 would remain significant and unavoidable.

Impact AQ-2

Implementation of Programmatic Mitigation Measures MM AQ-1 through MM AQ-3 and MM AQ-7 would minimize criteria air pollutant emissions from construction and operation associated with implementation of the FFTOD Specific Plan. However, impact AQ-2 would remain significant and unavoidable.

2. Cultural Resources

Impact CUL-1

Programmatic Mitigation Measure CUL-1 would mitigate potential impacts to historical resources to the greatest extent practicable but affords only limited protection to historic structures and would not ultimately prevent the demolition of a historic structure if preservation is determined to be infeasible. Impact CUL-1 would remain significant and unavoidable.

7.0 CONSIDERATIONS IN SUPPORT OF THE STATEMENT OF OVERRIDING CONSIDERATIONS

The following section describes the benefits of the proposed project that outweigh the proposed project's unavoidable adverse effects and provides specific reasons for considering the proposed project acceptable even though the Final EIR has indicated that there will be significant impacts to air quality and cultural resources. Accordingly, this Statement of Overriding Considerations regarding potentially significant adverse environmental impacts resulting from the proposed project, as set forth below, has been prepared. Pursuant to CEQA Guidelines §15093(c), the Statement of Overriding Considerations will be included in the record of the project approval and will also be noted in the Notice of Determination. Each of the benefits identified below provides a separate and independent basis for overriding the significant environmental effects of the proposed project.

Provides Employment Opportunities for Highly Skilled Workers:

FFTOD Specific Plan implementation will provide employment opportunities for a highly skilled workforce during both the construction and operation phases. Buildout of the FFTOD Specific Plan is estimated to generate 2,734 new jobs over existing conditions. Construction of future development projects pursuant to implementation of the FFTOD Specific Plan would also generate employment. Construction would involve multiple projects over an approximately 15-year buildout period; thus, construction employment is not estimated here. The construction effort of all future development projects would involve development of net increases of about 12,110 residential units and 1,183,013 square feet of nonresidential land uses.

Reduce Vehicle Miles Traveled:

Implementation of FFTOD Specific Plan would have an average daily VMT per service population of 20.3, or 33 percent below the 2020 South County Baseline, which is consistent with goals to reduce passenger VMT in SCAG's 2020-2045 RTP/SCS.

Sustainability:

A key component of the FFTOD Specific Plan is transforming the current circulation network, which largely supports vehicular travel, into a network that places a higher priority on transit, pedestrian, and bicycle mobility, as well as programmatic improvements to support complete streets and improve parking conditions. Streetscape improvements are intended to transform the auto-oriented streetscape into more sustainable, multimodal design. They include elements such as wider sidewalks, bicycle and transit facilities and amenities, landscaping and street trees, and lighting.

Implements the Objectives Established for the Proposed Project:

The FFTOD Specific Plan provides comprehensive direction for the development of the Specific Plan Area by establishing transit-oriented development policy direction, development standards, and implementation programs for the Florence-Firestone community as part of the Los Angeles County TOD Program of the Los Angeles County 2035 General Plan. The FFTOD Specific Plan would build from the 2019 FFCP by creating actions to achieve some of the FFCP policies and implement the broader TOD and sustainability goals of Los Angeles County.

Overall, the purpose of the FFTOD Specific Plan is to enhance the transit oriented development pattern, promote active transportation, reduce vehicle miles traveled, and improve the public realm in the Florence-Firestone area by focusing on updates to land use, urban design, and mobility. The FFTOD Specific Plan facilitates increased housing opportunities and employment-generating uses proximate to the Slauson, Florence, and Firestone TOD station areas to take advantage of the significant local and regional transit services already provided in the area. The proposed pedestrian, bicyclist, and transit-focused improvements throughout the FFTOD Specific Plan Area would help create an opportunity for redevelopment of unique high-quality transit areas in the Florence-Firestone community.

Thus, FFTOD Specific Plan implementation would achieve the five objectives established for the proposed project:

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

Conclusion

In balancing the benefits of the overall project described above with the proposed project's unavoidable and significant adverse environmental impacts, Los Angeles County finds that the proposed project's benefits individually and collectively outweigh the unavoidable adverse

impacts, such that these impacts are acceptable. Los Angeles County further finds that substantial evidence presented in the Final EIR supports adopting the Final EIR despite the proposed project's potential adverse impacts.

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Artist Credit: "Short Stories" Mural by Willie Middlebrook

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

Mitigation Monitoring and Reporting Program



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MITIGATION MONITORING AND REPORTING PROGRAM

1.0 INTRODUCTION

1.1 PURPOSE OF MITIGATION MONITORING PROGRAM

This Mitigation Monitoring and Reporting Program (MMRP) has been developed to provide a vehicle by which to monitor mitigation measures outlined in the Draft Environmental Impact Report (Draft EIR), State Clearinghouse No. 2021030300. The MMRP has been prepared in conformance with Section 21081.6 of the Public Resources Code. Section 21081.6 states:

- a) When making findings required by paragraph (1) of subdivision (a) of Section 21081 or when adopting a mitigated negative declaration pursuant to paragraph (2) of subdivision (c) of Section 21080, the following requirements shall apply:
 1. The public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate, or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation. For those changes which have been required or incorporated into the project at the request of a responsible agency or a public agency having jurisdiction by law over natural resources affected by the project, that agency shall, if so, requested by the lead or responsible agency, prepare, and submit a proposed reporting or monitoring program.
 2. The lead agency shall specify the location and custodian of the documents or other material which constitute the record of proceedings upon which its decision is based.

1.2 EIR SUMMARY

1.2.1 Project location

The proposed FFTOD Specific Plan Area encompasses the Los Angeles County unincorporated community of Florence-Firestone. The FFTOD Specific Plan Area is approximately 6 miles south of downtown Los Angeles and has an area of 3.48 square miles. The area is bound by the city of Los Angeles to the north, south, and west; the cities of Huntington Park and South Gate as well as the unincorporated community of Walnut Park are to the east. The LA Metro A (Blue) Line connects downtown Los Angeles to Long Beach and has three stations in the FFTOD Specific Plan Area (Slauson, Florence, and Firestone stations). LA Metro operates numerous bus routes in the community. Three freeways (Interstate [I]-110, I-105, I-10) are within a 2.5-mile radius of the community. Existing land uses in the FFTOD Specific Plan Area include low and medium density residential, commercial, light and heavy industrial, mixed uses, parks, and public facilities.

The FFTOD Specific Plan Area boundary is consistent with the Florence-Firestone Community Plan (FFCP) boundary and consistent with the extents of the Florence-Firestone community. Generally, the FFTOD Specific Plan Area is bounded on the north by Slauson Avenue; on the west

by S Central Avenue from Slauson Avenue to E 103rd Street; on the east by Wilmington Avenue, Santa Fe Avenue, and S Alameda Street; and on the south by E 103rd Street and E 92nd Street.

1.2.2 Project Description

The FFTOD Specific Plan would establish transit-oriented development policy direction, development standards, and implementation programs for the Florence-Firestone community as part of the Los Angeles County Transit Oriented District (TOD) Program of the Los Angeles County 2035 General Plan (General Plan). The TOD Program establishes transit oriented districts, defined as the approximately 0.5-mile radius around transit stations, as locations to encourage infill development with pedestrian-friendly and community-serving uses near transit stops. This focused, transit-oriented development is intended to increase living and working opportunities near transit and encourage increased walking, bicycling, and transit use. The FFTOD Specific Plan would build from the 2019 FFCP by creating actions to achieve some of the FFCP policies and implement the broader TOD and sustainability goals of Los Angeles County.

California law requires that cities and counties zone land to encourage and facilitate their fair share of housing growth—referred to as the Regional Housing Needs Assessment (RHNA). The FFTOD Specific Plan would provide the opportunity to create new affordable units to accommodate the needs of the residents. The FFTOD Specific Plan would help implement the Housing Element of the General Plan by rezoning parcels identified as housing sites to satisfy the RHNA.

Consistent with these General Plan policies and programs, the FFTOD Specific Plan would implement transit oriented district development by establishing zones that identify permitted land uses and objective development standards such as density, intensity, building height, and setbacks by zone; providing additional design standards such as pedestrian design, building design, open space and landscaping, and parking for all zones; modifying county-wide base zones applicable in Florence-Firestone; and identifying multi-modal improvements to support walking, bicycling, and transit use in balance with private vehicles; and address infrastructure requirements associated with future development.

The FFTOD Specific Plan is a Los Angeles County-initiated, Caltrans Sustainable Communities grant-funded project that is being proposed pursuant to the Los Angeles County General Plan to enhance the transit oriented development pattern, promote active transportation, reduce vehicle miles traveled, and improve the public realm in the Florence-Firestone area by focusing on updates to land use, urban design, and mobility in the Slauson, Florence, and Firestone TOD station areas. In addition, the proposed FFTOD Specific Plan is intended to streamline the approval process for future development projects that are consistent with the FFTOD Specific Plan.

The FFTOD Specific Plan would amend General Plan Land Use designations on parcels in Florence-Firestone to provide consistency with the General Plan policy direction for mixed use parcels along transportation corridors and support RHNA requirements by providing greater opportunity to create new affordable units. The proposed FFTOD Specific Plan would also establish land use development and design standards for features, such as scale and mass, building orientation, building architectural elements, circulation, parking, and exterior lighting. The standards established by this FFTOD Specific Plan are designed to increase the clarity of applicable regulations, support the goals and policies of the Los Angeles County General Plan and FFCP, and support transit oriented development investments in the community.

1.3 ENVIRONMENTAL IMPACTS

1.3.1 Impacts Considered Less Than Significant

The Draft EIR identified various thresholds from the CEQA Guidelines among a number of environmental categories that would not be significantly impacted by the FFTOD Specific Plan and therefore did not require mitigation. Impacts to the following environmental resources were found to be less than significant:

- Aesthetics
- Energy
- Geology and Soils
- Land Use and Planning
- Population and Housing
- Public Services
- Recreation
- Transportation

1.3.2 Potentially Significant Impacts that Can Be Mitigated, Avoided, or Substantially Lessened

The following were identified as having potentially significant impacts that could be reduced, avoided, or substantially lessened through implementation of mitigation measures:

- Greenhouse Gases
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Noise
- Tribal Cultural Resources
- Utilities and Service Systems

1.3.3 Unavoidable Significant Adverse Impacts

The following impacts were identified as Significant and Unavoidable in the Draft EIR:

- Air Quality
- Cultural Resources

2.0 MITIGATION MONITORING REQUIREMENTS

2.1 LOS ANGELES COUNTY

Los Angeles County is responsible for implementation of the MMRP, with the Los Angeles County Department of Regional Planning (DRP) as lead in coordination. The MMRP will be used by Los Angeles County staff responsible for ensuring compliance with mitigation measures associated with the proposed FFTOD Specific Plan. Monitoring will consist of review of appropriate documentation, such as plans, or reports prepared by the party responsible for implementation or by field observation of the mitigation measure during implementation.

As discussed in the Draft EIR, this EIR is a program EIR prepared in accordance with CEQA Guidelines Section 15168. Although the legally required contents of a program EIR are the same as for a project EIR, program EIRs are typically more conceptual than project EIRs, with a more general discussion of impacts, alternatives, and mitigation measures. According to Section 15168 of the CEQA Guidelines, a program EIR may be prepared on a series of actions that can be characterized as one large project. Use of a program EIR gives the lead agency an opportunity to consider broad policy alternatives and program-wide mitigation measures, as well as greater flexibility to address project-specific and cumulative environmental impacts on a comprehensive scale.

Agencies prepare program EIRs for programs or a series of related actions that are linked geographically; logical parts of a chain of contemplated events, rules, regulations, or plans that govern the conduct of a continuing program; or individual activities carried out under the same authority and having generally similar environmental effects that can be mitigated in similar ways.

Once a program EIR has been prepared, later activities in the program must be evaluated to determine whether an additional CEQA document is necessary. However, if the program EIR addresses the program's effects as specifically and comprehensively as possible, many later activities may be within the program EIR's scope, and additional environmental documents may not be required (Guidelines Section 15168[c]). When a lead agency relies on a program EIR for a later activity, it must incorporate feasible mitigation measures and alternatives from the program EIR into the later activities (Guidelines Section 15168[c][3]). If a later activity would have effects outside the scope of the program EIR, the lead agency must prepare a new Initial Study leading to a Negative Declaration, Mitigated Negative Declaration, or an EIR. Even in this case, the program EIR still serves a valuable purpose as the first-tier environmental analysis.

The mitigation measures described in this document are for a program-level decision (referred to as "programmatic mitigation measures") and are intended to be used to avoid, minimize, or reduce potentially significant environmental impacts of future development projects pursuant to implementation of the FFTOD Specific Plan. Project-level activities will undergo future environmental analysis as required by CEQA and when tiering from this EIR. As part of these second-tier environmental reviews, the individual project applicants, in coordination with Los Angeles County, will use the programmatic mitigation measures identified in this program document as starting points to determine their applicability to a specific project and to develop additional or more specific mitigation measures (as necessary) for significant adverse impacts identified in the project-specific analysis associated with their specific location and type of action. The CEQA monitoring process includes review, guidance, and reporting components. For second tier documents individual project applicants, in coordination with Los Angeles County, will note which applicable programmatic mitigation measures are being adopted and used and explain why others are not. Individual project applicants will, in coordination with Los Angeles County, provide a schedule for implementing the adopted mitigation measures and for reviewing the implementation of those measures.

Table 2.1-1 (Mitigation Monitoring and Reporting Program) identifies the programmatic mitigation measures by resource area. The table also identifies other mitigation monitoring requirements, including action(s) required, timing of monitoring activity, and the responsible and monitoring agency or party.

Table 2.1-1: Mitigation Monitoring and Reporting Program (MMRP)

#	Environmental Factor	Mitigation	Action Required	When Monitoring to Occur	Responsible Agency or Party	Monitoring Agency or Party
3.1	Aesthetics	No programmatic mitigation measures are required.	n/a	n/a	n/a	n/a
3.2	Air Quality	<p>MM AQ-1 Applicants for future development projects pursuant to implementation of the FFTOD Specific Plan shall require the construction contractor to use equipment that meets the US Environmental Protection Agency (EPA) Tier 4 Final emissions standards for off-road diesel-powered construction equipment with more than 50 horsepower, unless it can be demonstrated to Los Angeles County that such equipment is not available. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 4 diesel emissions control strategy for a similarly sized engine, as defined by the California Air Resources Board’s regulations.</p> <p>Prior to issuance of a building permit, the project engineer shall ensure that all demolition and grading plans clearly show the requirement for EPA Tier 4 Final or higher emissions standards for construction equipment over 50 horsepower. During construction, the construction contractor shall maintain a list of all operating equipment in use on the construction site for verification by Los Angeles County. The construction equipment list shall state the makes, models, and numbers of construction equipment onsite. Equipment shall be properly serviced and maintained in accordance with the manufacturer’s recommendations. In the event that the Lead Agency finds that Tier 4 construction equipment is not feasible pursuant to CEQA Guidelines Section 15364, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is reviewed and approved by the Lead Agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, Tier 3 construction equipment, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the Proposed Project, and/or limiting the number of individual construction project phases occurring simultaneously, if applicable.</p> <p>Construction contractors shall also ensure that all nonessential idling of construction equipment is restricted to 5 minutes or less in compliance with California Air Resources Board’s Rule 2449.</p>	Use of Tier 4 Final emissions standards for off-road diesel-powered construction equipment with more than 50 horsepower; Maintenance of a list of all operating equipment with make, model, and number; restriction of non-essential idling of construction equipment to 5 minutes or less.	Prior to issuance of building permit and throughout construction (during normal construction site inspections)	Project Engineer and Construction Contractor	Los Angeles County
3.2	Air Quality	<p>MM AQ-2 Applicants for future development projects pursuant to implementation of the FFTOD Specific Plan shall require the construction contractor to implement the requirements for fugitive dust control under South Coast Air Quality Management District (SCAQMD) Rule 403 to reduce PM₁₀ and PM_{2.5} emissions. Los Angeles County shall verify that these measures have been implemented during normal construction site inspections.</p> <ul style="list-style-type: none"> • Following all grading activities, the construction contractor shall reestablish ground cover on the construction site through seeding and watering; • During all construction activities, the construction contractor shall sweep streets with SCAQMD Rule 1186-compliant, PM10-efficient vacuum units on a daily basis if silt is carried over to adjacent public thoroughfares or occurs as a result of hauling; • During all construction activities, the construction contractor shall maintain a minimum 24-inch freeboard on trucks hauling dirt, sand, soil, or other loose materials and shall tarp materials with a fabric cover or other cover that achieves the same amount of protection; 	Compliance with SCAQMD Rule 403	Throughout construction (during normal construction site inspections)	Project Engineer and Construction Contractor	Los Angeles County

		<ul style="list-style-type: none"> • During all construction activities, the construction contractor shall water exposed ground surfaces and disturbed areas a minimum of every three hours on the construction site and a minimum of twice times per day; and • During all construction activities, the construction contractor shall limit onsite vehicle speeds on unpaved roads to no more than 15 miles per hour. 				
3.2	Air Quality	<p>MM AQ-3 Applicants for future development projects pursuant to implementation of the FFTOD Specific Plan shall require the construction contractor to use water-based or “super-compliant” low volatile organic compound (VOC) paints. Super-compliant low VOC paints shall be no more than 10 grams per liter (g/L) of VOC. Alternatively, the new development projects may use building materials, such as pre-painted materials that do not require the use of architectural coatings. Prior to issuance of a building permit, the project engineer shall ensure that all building plans clearly specify the use of water-based or “super-compliant” low VOC paints or materials that do not require the use of architectural coatings.</p>	Use of water-based or “super-compliant” low VOC paints	Prior to issuance of building permit	Project Engineer and Construction Contractor	Los Angeles County
3.2	Air Quality	<p>MM AQ-4 For future development projects that are one acre or larger, the applicant/developer shall provide modeling of the localized emissions (NO_x, CO, PM₁₀, and PM_{2.5}) associated with the maximum daily on-site construction and operational activities for the proposed development. If the modeling shows that emissions would exceed South Coast AQMD’s air quality CEQA localized thresholds for those emissions, as provided in Table 3.2-6 of this Program EIR, mitigation measures should be implemented to reduce these emissions to less than significant levels which may include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> • Installing diesel particulate filters or implementing other CARB-verified diesel emission control strategies on all construction equipment to reduce diesel PM emissions; • Using equipment during time when receptors are not present (e.g., when school is not in session or during nonschool hours, or when office buildings are unoccupied); • Establishing staging areas for the construction equipment that are as far as possible from sensitive receptors; • Communicating requirements through daily kick-off meetings and signage that off-road diesel equipment operators shut down their engines rather than idle for more than 5 minutes; • Planning construction phasing to minimize overlapping construction activities (e.g., building construction and paving) so that future construction activities continue to move further away from occupied land uses; • Use on-site cargo and material handling equipment that is the lowest emitting equipment available at the time of occupancy; • Incorporating exhaust emission controls on mobile and/or stationary sources (e.g., filters, oxidizers); • Implement measures and strategies included in the Assembly Bill 617 2020 Southeast Los Angeles Community Emissions Reduction Plan, or the most applicable plan at the time the project is proposed; and • Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding air pollution concerns and complaints. The SCAQMD’s phone number shall also be visible to ensure compliance with applicable regulations. 	Localized criteria pollutant emissions modeling	As part of second-tier environmental review of an individual future development project	Applicant/Developer	Los Angeles County

3.2	Air Quality	<p>MM AQ-5 When applicable, new development that would result in substantial toxic air contaminant (TAC) emissions directly or indirectly (e.g., industrial sources) or that would expose sensitive receptors to substantial TAC concentrations (e.g., residential land uses located near existing TAC sources) shall implement California Air Resource Board’s (CARB’s) Air Quality and Land Use Handbook: A Community Health Perspective (Handbook) guidance concerning land use compatibility with regard to sources of TAC emissions, or CARB guidance as it may be updated in the future.</p>	Compliance with CARB’s Handbook guidance with regard to sources of TAC emissions.	As part of second-tier environmental review of an individual future development project	Applicant/Developer	Los Angeles County
3.2	Air Quality	<p>MM AQ-6 For future development projects with the potential to generate substantial TAC emissions or expose sensitive receptors to substantial TAC pollutant concentrations, Los Angeles County shall require a site-specific analysis for construction and/or operational activities, and appropriate mitigation, as necessary, to ensure that sensitive receptors are not exposed to substantial pollutant concentrations. In communication with the SCAQMD, Los Angeles County shall require, if necessary, a site-specific health risk analysis for operational activities to determine whether health risks attributable to future proposed projects in relation to proposed, planned, and/or existing sensitive receptors would exceed applicable thresholds of significance. Site-specific analysis may include screening level analysis, dispersion modeling, and/or a health risk assessment, consistent with applicable guidance from the SCAQMD. Analyses shall take into account regulatory requirements for proposed uses.</p> <p>Los Angeles County shall require the project applicant(s) to identify and implement feasible mitigation measures to reduce any potentially significant effect and communicate with the SCAQMD to identify measures to reduce exposure of sensitive receptors to substantial pollutant concentrations to levels consistent with thresholds recommended by the SCAQMD (Table 3.2-7 of this Program EIR) or as applicable at the time the project is proposed.</p> <p>Agreed upon feasible mitigation actions shall be documented as a project condition of approval. If the results of analysis for the operational activities of any future development project within the FFTOD Specific Plan Area determine that the performance standard for this mitigation would be exceeded, actions shall be taken to reduce potential operational impacts which may include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> • Locating air intakes and designing windows to reduce particulate matter exposure by, for example, not allowing windows facing the source to open; • Providing electrification hook-ups for transport refrigeration units (TRUs) to avoid diesel-fueled TRUs continuing to operate at loading docks during loading and unloading operations; • Requiring the TAC-generating activity (e.g., loading docks and idling activities) be located away from sensitive receptors and installing “No Idling” signs; • Incorporating exhaust emission controls on mobile and/or stationary sources (e.g., filters, oxidizers); • Develop and implement a dock management system at the time of occupancy to minimize on-site idling below regulatory limits and reduce non-critical idling; • Require all on-site user owned and operated trucks with transportation refrigeration units to be capable of plugging into power at loading docks and require plug-in when at the loading dock; • Use on-site cargo and material handling equipment that is the lowest emitting equipment available at the time of occupancy; 	Site-specific TAC emissions analysis	As part of second-tier environmental review of an individual future development project	Applicant/Developer	Los Angeles County

		<ul style="list-style-type: none"> • Evaluate the potential to electrify a portion of entirety of an on-site user-owned and operated truck fleet; • Evaluate the potential to consolidate delivery or haul truck trips to increase the load and decrease vehicle trips; • Provide building air filtration units with a Minimum Efficiency Reporting Value (MERV) that are adequate to address adjacent sensitive land uses according to performance standards of this mitigation measure; • Ensure adequate distance between existing and planned sensitive receptors and gasoline dispensing facilities, based on the proposed size and design of any gasoline-dispensing facilities; • Use vegetated buffers between substantial TAC-generating source locations and sensitive receptors; • Implement measures and strategies included in the Assembly Bill 617 2020 Southeast Los Angeles Community Emissions Reduction Plan, or the most applicable plan at the time the project is proposed; and • Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding air pollution concerns and complaints. The SCAQMD's phone number shall also be visible to ensure compliance with applicable regulations. <p>If analysis demonstrates that construction activities associated with development of FFTOD Specific Plan land uses or off-site improvement components would exceed the performance standards identified in this mitigation measure, actions shall be taken to reduce potential construction-related impacts which may include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> • Installing diesel particulate filters or implementing other CARB-verified diesel emission control strategies on all construction equipment to reduce diesel PM emissions; • Using equipment during time when receptors are not present (e.g., when school is not in session or during nonschool hours, or when office buildings are unoccupied); • Establishing staging areas for the construction equipment that are as far as possible from sensitive receptors; • Rerouting construction trucks away from congested streets or sensitive receptor areas; • Communicating requirements through daily kick-off meetings and signage that off-road diesel equipment operators shut down their engines rather than idle for more than 5 minutes; • Documenting that all off-road equipment is compliant with the CARB in-use off-road diesel vehicle regulation; • Establishing an electrical supply to the construction site and use electric-powered equipment instead of diesel-powered equipment or generators, where feasible; • Using haul trucks with on-road engines instead of off-road engines; • Equipping nearby buildings with High Efficiency Particle Arresting (HEPA) filters systems at all mechanical air intake points to the building to reduce the levels of diesel PM that enter buildings; • Planning construction phasing so that future construction activities continue to move further away from occupied land uses; and 				
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		<ul style="list-style-type: none"> Planning construction phasing to complete mass site grading, which typically generates the largest portion of diesel PM emissions, prior to occupancy of the project site. 					
3.2	Air Quality	MM AQ-7	Prior to issuance of a building permit for new residential projects within the FFTOD Specific Plan, the property owner/developer shall show on the building plans that no fireplaces are included in the design of the dwelling units. Compliance would be ensured through Los Angeles County review prior to the issuance of a building permit.	Fireplace restriction	Prior to issuance of building permit	Property Owner/Developer	Los Angeles County
3.3	Cultural Resources	MM CUL-1	<p>For all future development projects pursuant to implementation of the FFTOD Specific Plan that involve ground disturbance and/or alteration of an existing structure, a historical resources assessment shall be performed by an architectural historian or historian meeting the Secretary of the Interior’s (SOI’s) Professional Qualification Standards (SOI Standards) to identify any historical resources that might be directly or indirectly affected. Assessments shall include a database search to determine if any resources potentially affected by the future development project have been designated or evaluated under federal or state designation programs or if any have been documented pursuant to a local historic resources survey effort. The qualified architectural historian or historian shall perform a reconnaissance- and/or intensive-level survey to identify any previously unrecorded potential historical resources that might be affected by the future development project. Surveys shall be performed in accordance with the Office of Historic Preservation guidelines and potential historical resources should be evaluated under a developed historic context, pursuant to the definition of an historical resource under CEQA.</p> <p>The SOI Standards for the Treatment of Historic Properties will be used to the maximum extent practicable to ensure that future development projects involving the relocation, conversion, rehabilitation, or alteration of an historical resource and its settings or related new construction will not impair the significance of the historical resource. Use of the SOI Standards shall be overseen by an architectural historian or historic architect meeting the SOI Professional Qualification Standards. Evidence of compliance with the SOI Standards shall be provided to Los Angeles County in the form of a report identifying character-defining features and specifying how treatment of character-defining features and construction activities will conform to the SOI Standards.</p> <p>While demolition or alteration of an historical resource such that its significance is materially impaired cannot be mitigated to a less-than-significant level, recordation of the resource will reduce significant adverse impacts to historical resources to the maximum extent feasible. Such recordation should be prepared under the supervision of an architectural historian or historian meeting the SOI Professional Qualification Standards and should take the form of Historic American Buildings Survey (HABS) documentation. At a minimum, this recordation should include an architectural and historical narrative; medium- or large-format, black-and-white photographic documentation, including negatives and prints; and supplementary information, such as building plans and elevations and/or historic photographs. The documentation package should be reproduced on archival paper and should be made available to researchers and the public through accession by appropriate institutions such as libraries, the SCCIC, and/or the HABS collection housed in the Library of Congress.</p>	Historical resources assessment and SOI Standards for treatment and HABS documentation (as applicable)	As part of second-tier environmental review of an individual future development project	Applicant/Developer	Los Angeles County

<p>3.3</p>	<p>Cultural Resources</p>	<p>MM CUL-2 Avoidance, preservation, or data recovery shall be conducted for archaeological resources that could be affected by ground disturbing activities and are found to be significant resources. To ensure that future development projects in the FFTOD Specific Plan Area do not result in significant impacts to pre-historic or historic archaeological resources, the following shall be implemented.</p> <p>Any ground disturbing activities such as installation of utilities, shall be subject to a Phase I cultural resources inventory on a project-specific basis prior to Los Angeles County’s approval of project plans. The study shall be carried out by a qualified archaeologist, defined as an archaeologist meeting the SOI Standards for professional archaeology. The cultural resources inventory would consist of: a cultural resources records search to be conducted at the SCCIC; a Sacred Lands File Search by the NAHC and with interested Native Americans identified by the NAHC; a pedestrian archaeological survey where deemed appropriate by the archaeologist; and recordation of all identified archaeological resources on California Department of Parks and Recreation 523 forms. If potentially significant cultural resources are encountered during the survey, Los Angeles County shall require evaluation of the resources for their eligibility for listing in the CRHR and for significance as a historical resource or unique archaeological resource per CEQA Guidelines Section 15064.5. Recommendations shall be made for treatment of these resources if found to be significant. Per CEQA Guidelines Section 15126.4(b)(3), project redesign and preservation in place shall be the preferred means of mitigation to avoid impacts to significant cultural resources, including prehistoric and historic archaeological sites, locations of importance to Native Americans, human remains, historical buildings, structures and landscapes. Methods of avoidance may include, but shall not be limited to, project reroute or redesign, project cancellation, or identification of protection measures such as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures, which may include data recovery or other appropriate measures, in consultation with LA County, and local Native American representatives expressing interest.</p> <p>During future development project-level construction, should prehistoric or historic subsurface cultural resources are discovered, all activity in the vicinity of the find shall stop and a qualified archaeologist will be contacted to assess the significance of the find according to CEQA Guidelines Section 15064.5. If any find is determined to be significant, the archaeologist shall determine—in consultation with Los Angeles County, and local Native American groups expressing interest—appropriate avoidance measures or other appropriate mitigation. Per CEQA Guidelines Section 15126.4(b)(3), project redesign and preservation in place shall be the preferred means to avoid impacts to significant cultural resources. Methods of avoidance may include, but shall not be limited to, project re-route or redesign, project cancellation, or identification of protection measures such as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures in consultation with Los Angeles County, which may include data recovery or other appropriate measures. All significant cultural materials recovered will be, as necessary and at the discretion of the consulting archaeologist and in consultation with local Native American groups expressing interest, subject to scientific analysis, professional museum curation, and documentation according to current professional standards.</p>	<p>Phase I cultural resources inventory and if prehistoric or historic subsurface cultural resources are discovered</p>	<p>As part of second-tier environmental review of an individual future development project</p> <p>Upon discovery of prehistoric or historic subsurface cultural resources during future ground-disturbing activities of a project</p>	<p>Applicant/Developer</p> <p>Construction contractor and qualified archaeologist.</p>	<p>Los Angeles County</p>
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3.3	Cultural Resources	<p>MM CUL-3 Applicants for future development projects pursuant to the implementation of the FFTOD Specific Plan shall retain a qualified paleontologist (in accordance with the Society of Vertebrate Paleontologists) to monitor all ground-disturbing activities in native soils or sediments beginning at 5 feet below ground surface and deeper. If upon observing initial earthwork the paleontologist determines that there is low potential for discovery, no further action shall be required and the paleontologist shall submit a memo to Los Angeles County confirming findings of low potential. If upon observing initial earthwork the paleontologist determines there is a moderate to high potential for discovery, a qualified paleontologist or paleontological monitor (retained by Los Angeles County) shall monitor all mass grading and excavation activities. Monitoring will be conducted in areas of grading or excavation in undisturbed formation sediments, as well as where over-excavation of surficial alluvial sediments will encounter these formations in the subsurface. Paleontological monitors shall be equipped to salvage fossils as they are unearthed to avoid construction delays and to remove samples of sediment that are likely to contain the remains of small fossil invertebrates and vertebrates. The monitor must be empowered to temporarily halt or divert equipment to allow removal of abundant or large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface; or, if present, are determined on exposure and examination by qualified paleontological personnel to have low potential to contain fossil resources.</p> <p>If any paleontological resources (i.e., fossils) are uncovered during construction activities, all work within a 100-foot radius of the discovery site shall be halted or diverted to other areas on the site and Los Angeles County shall be immediately notified. The qualified paleontologist shall evaluate the finds and recommend appropriate next steps to ensure that the resource is not substantially adversely impacted, including but not limited to avoidance, preservation in place, excavation, documentation, curation, data recovery, or other appropriate measures. Further, ground disturbance shall not resume within a 100-foot radius of the discovery site until an agreement has been reached between the project applicant, the qualified paleontologist, and Los Angeles County regarding the appropriate preservation or mitigation measures to ensure that the resource is not substantially adversely impacted.</p> <p>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.</p> <p>Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage shall occur at an institutional repository approved by Los Angeles County. The paleontological program shall include a written repository agreement prior to the initiation of mitigation activities.</p> <p>A final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered and necessary maps and graphics to accurately record their original location. The report, when submitted to and accepted by Los Angeles County, shall signify satisfactory completion of this program to mitigate impacts to any potential nonrenewable paleontological resources (i.e., fossils) that might have been lost or otherwise adversely affected without such a program in place.</p>	<p>Ground-disturbing activities in native soils or sediments at 5 feet or below ground surface</p> <p>Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage</p> <p>Preparation of monitoring and mitigation report of findings and significance</p>	<p>Ground-disturbing activities in native soils or sediments at 5 feet or below ground surface</p>	<p>Construction contractor and qualified paleontologist/paleontological monitor</p>	<p>Los Angeles County</p>
3.4	Energy	<p>No programmatic mitigation measures are required.</p>	<p>n/a</p>	<p>n/a</p>	<p>n/a</p>	<p>n/a</p>

3.5	Geology and Soils	No programmatic mitigation measures are required.	n/a	n/a	n/a	n/a
3.6	Greenhouse Gases	Refer to Programmatic Mitigation Measure MM AQ-7.	n/a	n/a	n/a	n/a
3.7	Hazards and Hazardous Materials	MM HAZ-1 Prior to the issuance of a demolition permit, a survey shall be required to characterize the potential exposure and prevent the potential release of asbestos-containing materials (ACM) and lead-based paint (LBP) associated with individual future development projects pursuant to implementation of the FFTOD Specific Plan. Inspections and surveys shall be conducted by a licensed or certified lead inspector/assessor and by a California Certified Asbestos Consultant.	ACM and LBP inspection/survey	Prior to issuance of a demolition permit	Applicant/Developer	Los Angeles County
3.7	Hazards and Hazardous Materials	MM HAZ-2 Applicants for future development projects on former or industrial sites, shall prepare and submit a Phase I Environmental Site Assessment (ESA) to Los Angeles County to identify environmental conditions of the development site and determine whether contamination is present. The Phase I ESA shall be prepared by an Environmental Professional in accordance with the American Society for Testing and Materials (ASTM) Standard E 1527.13, “Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.” If recognized environmental conditions related to soils or groundwater are identified in the Phase I ESA, the project applicant shall have soil and soil gas sampling performed, as required, as a part of a Phase II ESA. If contamination is found at significant levels, the project applicant shall remediate all contaminated soils in accordance with state and local agency requirements and with the oversight of the California DTSC, RWQCB, LACoFD, etc. All contaminated soils and/or material encountered shall be disposed of at a regulated site and in accordance with applicable laws and regulations prior to the completion of grading. Each Phase I ESA conducted for projects that involve demolition activities shall include an inspection for lead-based paint conducted by a licensed or certified lead inspector/assessor and a survey for asbestos-containing materials conducted by a California Certified Asbestos Consultant. Prior to the issuance of building permits, a report documenting the completion, results, and follow-up remediation on the recommendations—if any—shall be provided to the Los Angeles County evidencing that all site remediation activities have been completed.	Phase I ESA	As part of second-tier environmental review of an individual future development project	Applicant/Developer	Los Angeles County
3.8	Hydrology and Water Quality	MM HYD-1 Prior to the issuance of a grading permit for any future development project having a direct connection to Hooper Avenue Drain or that is tributary to Glen Avenue Drain, the project applicant/developer shall submit a site-specific infrastructure assessment for review and approval by Los Angeles County Public Works. The infrastructure assessment shall be sufficient for Los Angeles County Public Works to make the determination of whether drainage improvements or upgrades would be required as part of the development project. To assist in this determination, the site-specific infrastructure assessment shall include a detailed drainage analysis, including the consideration of drainage solutions (such as retention-based stormwater quality control measures on site or within public rights-of-way) that allow area drains to function within designed capacity, and/or system capacity improvements.	Site-specific infrastructure assessment	As part of second-tier environmental review of an individual future development project	Applicant/Developer	Los Angeles County Public Works

3.9	Land Use and Planning	No programmatic mitigation measures are required.	n/a	n/a	n/a	n/a
3.10	Noise	<p>MM NOI-1 At the project level, future development projects pursuant to implementation of the FFTOD Specific Plan shall be required to execute the following actions when key scenarios have the potential to occur:</p> <ul style="list-style-type: none"> Proposed single-family homes with exterior areas exposed to noise levels greater than 60 dBA, CNEL and multifamily residences with exterior areas exposed to noise levels greater than 65 dBA, CNEL shall incorporate noise mitigation in the form of setbacks, noise barriers, or other methods to achieve compliance with Los Angeles County’ exterior noise standards. For future development projects without exterior use areas but expose exterior facades of noise-sensitive spaces to noise levels greater than 65 dBA, CNEL, project applicants shall demonstrate that the acoustic performance of the building shell meets or exceeds California Building Code requirements. Project applicants shall demonstrate compliance with the above through the preparation of an acoustical assessment. 	Preparation of acoustical assessment	As part of second-tier environmental review of an individual future development project	Applicant/Developer	Los Angeles County
3.10	Noise	<p>MM NOI-2 At the project level, prior to the approval of a grading permit or building permit, operation of typical construction equipment (e.g., any equipment excluding impact pile drivers) shall be prohibited within 25 feet of receiving structures. If construction equipment is required within 25 feet of receiving structures, project applicants shall demonstrate vibration levels will not exceed 0.1 PPV in/sec at any occupied residential properties and 0.3 PPV in/sec at any existing structure (a limit which may be increased to 0.5 PPV in/sec for newer residential and modern commercial buildings). For any future development project that proposes construction activities within 25 feet of a structure, project applicants shall demonstrate compliance with the above through the preparation of a vibration assessment.</p>	Preparation of a vibration assessment	As part of second-tier environmental review of an individual future development project	Applicant/Developer	Los Angeles County
3.11	Population and Housing	No programmatic mitigation measures are required.	n/a	n/a	n/a	n/a
3.12	Public Services	No programmatic mitigation measures are required.	n/a	n/a	n/a	n/a
3.13	Recreation	No programmatic mitigation measures are required.	n/a	n/a	n/a	n/a
3.14	Transportation	No programmatic mitigation measures are required.	n/a	n/a	n/a	n/a
3.15	Tribal Cultural Resources	Refer to Programmatic Mitigation Measures MM CUL-1 through MM CUL-3.	n/a	n/a	n/a	n/a
3.16	Utilities and Service Systems	<p>MM USS-1 Prior to the issuance of a grading permit for mixed use parcels and medium density or higher residential parcels that include several buildings serviced by one meter location, the project applicant/developer shall submit a site-specific infrastructure assessment to confirm the efficacy of the infrastructure to meet the increased demand, in accordance with Golden State Water Company requirements, Los Angeles County development regulations, and the California Subdivision Map Act.</p> <p>The Golden State Water Company Florence-Graham District Urban Water Management Plan last updated in 2015 shall be consulted for all water system upgrade considerations.</p>	Site-specific infrastructure assessment	As part of second-tier environmental review of an individual future development project	Applicant/Developer	Los Angeles County

3.16	Utilities and Service Systems	<p>MM USS-2 Prior to the issuance of a grading permit for any future development project having a direct connection to any sewer, the project applicant/developer shall submit a site-specific infrastructure assessment for review and approval by the Los Angeles County Public Works. The infrastructure assessment shall be sufficient for Los Angeles County Public Works to make the determination of whether sewer improvements or upgrades would be required as part of the development project. To assist in this determination, the site-specific infrastructure assessment shall include a detailed sewer area analysis that addresses increased zoning density/intensity.</p>	Site-specific infrastructure assessment	As part of second-tier environmental review of an individual future development project	Applicant/Developer	Los Angeles County Public Works
3.16	Utilities and Service Systems	<p>MM USS-3 New development or redevelopments pursuant to implementation of the FFTOD Specific Plan shall be responsible for upgrades and undergrounding of distribution lines as determined by SCE in coordination with Los Angeles County Public Works after building plan submittal. Underground electricity is more reliable, safer, and more aesthetically pleasing. Ultimately, SCE and CPUC will determine which overhead sections will be relocated underground; electric supply and demand are generally determined on a case-by-case basis.</p> <p>Developers shall be responsible for the costs of required undergrounding and may also be required to bear the costs for extending streetlights or modifying traffic signals. Los Angeles County Public Works will determine streetlight and traffic signal modifications for new and redevelopments in accordance with Los Angeles County development requirements.</p> <p>CPUC Rule 20A provides funding for undergrounding of utilities (including communications) through “work credits” given by the utility company to the cities or unincorporated counties on a yearly basis. These work credits can be used in areas determined to be in the “public interest.” The following are “Public Interest” criteria:</p> <ul style="list-style-type: none"> • Eliminate an unusually heavy concentration of overhead lines; • Involve a street or road with a high volume of public traffic; • Benefit a civic or public recreation area or area of unusual scenic interest; and • Be listed as an arterial street or major collector as defined by the governor’s OPR Guidelines <p>Community and local governments determine these criteria through public hearings and consultation with the local utility. Full funding of an overhead distribution line to underground requires successful “public interest” determination, collection of enough Rule 20A work credits by the utility (including a possible 5-year “borrow forward” if required), and the creation of a utility underground district.</p> <p>The following areas deserve some consideration for a Rule 20A undergrounding process:</p> <ul style="list-style-type: none"> • Gage Avenue—Strip mall development between Hooper Avenue and Compton Avenue resulted in removal of power lines from that section. Removing remaining overhead lines from this arterial would be a public benefit; • Alameda Street—Entire length of major collector north of 92nd Street has overhead lines; Alameda serves as a gateway to the area from the east. Removal of overhead lines would be a public benefit; • Hooper Avenue—Important thoroughfare from Slauson Avenue to Nadeau Street. Removal of overhead lines would greatly beautify and secure the western side of the FFTOD Specific Plan Area; and 	Coordination with SCE, CPUC, and Los Angeles County Public Works regarding undergrounding of electrical distribution lines	Following building plan submittal	Applicant/Developer	Los Angeles County Public Works

		<ul style="list-style-type: none"> Nadeau Street—There are overhead lines on this important central collector starting east of Holmes Avenue/Franklin D. Roosevelt Park. Removal of these lines would greatly improve the eastern half of the FFTOD Specific Plan Area. 				
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3.0 REPORT PREPARATION

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