

**CEQA FINDINGS OF FACT AND
STATEMENT OF OVERRIDING CONSIDERATIONS**

**REGARDING THE
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT
FOR THE
LOS ANGELES COUNTY WESTSIDE AREA PLAN
STATE CLEARINGHOUSE NO. 2023110409**

I. INTRODUCTION

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. The potential environmental effects of the proposed Westside Area Plan (WSAP or proposed Project) have been analyzed in a Draft Program Environmental Impact Report (Draft PEIR) (State Clearinghouse [SCH] 2023110409) dated June 2024. A Final EIR has also been prepared that incorporates the Draft PEIR and contains comments received on the Draft PEIR, responses to the individual comments, revisions to the Draft PEIR including any clarifications based on the comments and the responses to the comments, and the Mitigation Monitoring and Reporting Program (MMRP) for the proposed Project. This document provides the findings required by CEQA for approval of the proposed Project.

A. Statutory Requirements for Findings

The CEQA (Pub. Res. Code §§ 21000, *et seq.*) and the State CEQA Guidelines (Guidelines) (14 Ca. Code Regs §§ 15000, *et seq.*) promulgated thereunder, require the environmental impacts of a project be examined before a project is approved. 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 final EIR.
 2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
 3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained

workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

- (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) above, that are required in, or incorporated into, the project which mitigate or avoid the significant environmental effects of the project, 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.

Regarding a Statement of Overriding Considerations, Guidelines Section 15093 provides:

- (a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposal [sic] project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."
- (b) When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.
- (c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.

B. Certification

Having received, reviewed, and considered the EIR for WSAP State Clearinghouse No. 2023110409, as well as other information in the record of proceedings on this matter, the County, as the Lead Agency adopts and certifies the following Findings (Findings) and Statement of Overriding Considerations. The Findings and Statements of Overriding Considerations set forth the environmental and other bases for current and subsequent discretionary actions to be undertaken by the County and responsible agencies for the implementation of the WSAP.

In addition, the County hereby make findings pursuant to and in accordance with Section 21081 of the California Public Resources Code and State CEQA Guidelines Sections 15090 and 15091 and hereby certifies that:

- (1) Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant environmental effect as identified in the final EIR.
- (2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

- (3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

C. Program Environmental Report And Discretionary Actions

The FEIR addresses the direct, indirect, and cumulative environmental effects associated with adoption of the WSAP. The FEIR provides the environmental information necessary for the County to make a final decision on the requested discretionary actions. Discretionary actions to be considered by the County may include, but are not limited to, the following:

- Certification of the Westside Area Plan Program Environmental Impact Report (Environmental Assessment No. RPPL2023002449)
- Adoption of General Plan Amendment No. RPPL2023002433
- Adoption of Zone Change No. RPPL2023002450
- Adoption of Advance Planning Case No. RPPL2023002448

II. PROCEDURAL COMPLIANCE WITH CALIFORNIA ENVIRONMENTAL QUALITY ACT

The County published a Draft PEIR on June 18, 2024. A FEIR was completed in September of 2024 in compliance with CEQA requirements. The FEIR has been prepared in accordance with CEQA and the CEQA Guidelines. As authorized in State CEQA Guidelines Section 15084(d)(2), the County retained a consultant to assist with the preparation of the environmental documents. County staff from multiple departments, representing the Lead Agency, have directed, reviewed, and modified where appropriate all material prepared by the consultant. The FEIR reflects the County's independent analysis and judgement. The key milestones associated with the preparation of the EIR are summarized below. As presented below, an extensive public involvement and agency notification effort was conducted to solicit input on the scope and content of the EIR and to solicit comments on the results of the environmental analysis presented in the Draft PEIR.

A. Environmental Review Process

In conformance with CEQA, the State CEQA Guidelines, and the County CEQA Guidelines, the County conducted an extensive environmental review of the proposed project.

- The County determined that a Program EIR (PEIR) would be required for the proposed Project and issued a Notice of Preparation (NOP) and Notice of Public Scoping Meeting on November 16, 2023. The public review period extended from November 16, 2023, to December 15, 2023.
- The NOP was sent to over 1,000 recipients on the WSAP project contact list, the Office of Planning and Research State Clearinghouse, and interested agencies and organizations. It was posted to the County's WSAP project website and published in two local newspapers, LA Sentinel and the Argonaut.

- The County conducted a virtual public scoping meeting (Zoom webinar) on November 30, 2023 from 5:30 pm to 7:30 pm. The meeting included a presentation with an overview of the WSAP information known at the time, and an overview of the CEQA process. An estimated 26 members of the public participated in the scoping meeting (including six who provided verbal comment). Section 2.4, *Notice of Preparation and Scoping Meeting*, of the Draft PEIR describes the issues raised during scoping and where they are addressed in the Draft PEIR.
- A total of nine comment letters were provided during the scoping period, which were considered during preparation of the Draft PEIR.
- The County staff determined that a Draft PEIR should be prepared for the proposed Project. The scope of the Draft PEIR was based in part on comments received in response to the NOP and comments received at the scoping meeting conducted by the County.
- The County prepared a Draft PEIR and Notice of Availability (NOA), which were initially made available for a 45-day public review period beginning June 18, 2024, and ending August 1, 2024. It was noticed using the same distribution as the NOP.
- The County held a virtual public informational meeting, online via Zoom Webinar, on June 25, 2024 at 6:00 pm. The meeting included a presentation with an overview of the WSAP and the contents of the Draft PEIR. An estimated 283 members of the public participated in the scoping meeting. An estimated 11 verbal comments were received during the meeting.
- In response to public requests received during the public comment period, the comment period was extended an additional 15 days, to conclude on August 16, 2024.
- In response to public requests received during the public comment period, the County held an additional in-person community meeting on August 1, 2024, from 6:00 pm to 8:30 pm at the Knox Presbyterian Church (5810 La Tijera Boulevard, Los Angeles CA 90056), to provide further information regarding the WSAP and solicit input on the project from the community. An estimated 200 people were in attendance, and a total of 179 written public comment cards were received during the meeting.
- A total of 800 comment letters were received during the public comment period as follows:
 - 4 letters from public agencies
 - 6 letters from organizations/groups
 - 168 letters from individuals in the community
 - 622 letters in the form of four different versions of “form” letters
 - Form Letter 1 – 110 letters received
 - Form Letter 2 – 8 letters received
 - Form Letter 3 – 302 letters received
 - Form Letter 4 – 202 letters received
- The County prepared a Final EIR, including the Responses to Comments to the Draft PEIR, the Findings of Fact, and the Statement of Overriding Considerations. The Final EIR/Response to

Comments contains comments on the Draft PEIR, responses to those comments, revisions to the Draft PEIR, and appended documents.

- As a result of comments received during the public comment period, the County has elected to reduce the scope of the proposed Project included in the WSAP and the Final EIR. The following are key changes to the Project Description.
 - Elimination of Opportunity Site 1 (Centinela-Green Valley (SE)) and Opportunity Site 10 (Angeles Vista-Valley Ridge) from the WSAP
 - Elimination of rezoning on Fairview and Springfield site.
 - Application of a 45-foot height limit for development within the MXD zone in the community of Ladera Heights, View Park/Windsor Hills, which is a reduction from 65-feet. This will be established in the PASD.
 - A small unincorporated parcel of land on the Fairfax neighborhood of the City of Los Angeles, is occupied by a parking lot integrated cohesively within the overall CBS Television City Studio complex. It is currently zoned for Major Commercial (C-MJ) use, consistent with the site’s current use and the long-term use of the surrounding properties. As part of the revised WSAP, the County is rezoning this site from C-MJ to MU/MXD, consistent with public requests.

Total reduction of potential development facilitated by the WSAP as a result of the reduced zoning changes is as follows:

| | Proposed in Draft WSAP and Draft PEIR | Revised in Final WSAP and Final EIR | Net Difference |
|-----------------------------|---------------------------------------|-------------------------------------|----------------|
| Dwelling Units | 6,757 | 6,212 | 545 |
| Households | 6,489 | 5,966 | 523 |
| Non-Residential Square Feet | 244,000 | 239,000 | 5,000 |

- A public hearing will be held before the Los Angeles County Regional Planning Commission (RPC) on October 23, 2024. The Notice of Public Hearing before the RPC was published in the Argonaut, LA Sentinel and Daily Journal newspapers, and on the project website.

B. 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 the County in conjunction with the proposed project
- The Final EIR for the proposed project.
- The Draft PEIR.

- All written comments submitted by agencies or members of the public during the public review comment period on the Draft PEIR.
- All responses to written comments submitted by agencies or members of the public during the public review comment period on the Draft PEIR.
- All written and verbal public testimony presented during a noticed public hearing for the proposed project.
- The Mitigation Monitoring and Reporting Program (MMRP).
- All documents, studies, EIRs, or other materials incorporated by reference in the Draft PEIR and Final EIR.
- Title 22 amendment to establish a Planning Area Standards District (PASD).
- The Resolutions adopted by the County in connection with the proposed project, and all documents incorporated by reference therein, including comments received after the close of the comment period and responses thereto.
- Matters of common knowledge to the 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).

C. Custodian and Location of Records

The documents and other materials that constitute the administrative record for the County's actions related to the project are at the Los Angeles County Department of Regional Planning's (County Planning) main office (320 W. Temple Street, Los Angeles, CA 90012). County Planning is the custodian of the administrative record for the 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 Planning Department. This information is provided in compliance with Public Resources Code Section 21081.6(a)(2) and Guidelines Section 15091(e).

D. Project Location

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

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

E. Project Objectives

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

- Preserve community character by focusing new housing and commercial development within existing commercial corridors and centers and in proximity to transit, while allowing changes in existing residential neighborhoods consistent with State legislation.
- Provide greater housing choices for residents, consistent with the Housing Element.
- Foster the economic health and prosperity of local businesses by promoting a mix of uses and adaptability of buildings in response to the evolving commercial marketplace, nurturing small businesses, and attracting job opportunities and commercial services that serve local residents.
- Prioritize the development of businesses that serve and are accessible to their neighborhoods and reflect the history and culture of the Westside Planning Area.
- Transform today's automobile dominant land use pattern and densities and improve streetscapes to promote a more active pedestrian environment.

- Promote the inclusion of publicly accessible plazas and courtyards in new commercial and mixed-use development projects where residents can gather, participate in events, and celebrate the history and culture of the community.
- Protect open spaces and natural resources while emphasizing sustainable building practices and implementing infrastructure improvements that are environmentally sensitive and minimize impacts on energy, water, air, and climate.
- Provide a diversity of travel choices by enabling residents to efficiently and safely access destinations throughout the community by walking, biking, using public transit, and emerging forms of transportation.

F. Project Description

The Project will establish the Westside Area Plan as part of the County General Plan. The WSAP is a community-based plan that will guide regional growth through horizon year 2045 within the Westside Planning Area. The description below reflects those changes made to the WSAP by the County as a result of public comments received. The primary Project components include the following:

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

- Areawide goals and policies with respect to: Land Use, Mobility, Conservation and Open Space, Public Services and Facilities, Historic Preservation, and Economic Development.
- Action-oriented programs implementing the areawide goals and policies.
- Chapters presenting additional locally defined goals, policies, and implementation programs that are specific to neighborhoods, addressing planning issues unique to these areas that are not addressed through areawide goals, policies, and programs.
- The WSAP would provide for land use changes on ten identified opportunity sites that, if developed to the maximum allowable densities, would result in increased residential and mixed-use densities totaling 6,757 dwelling units (estimated to generate 5,966 households) and 239,000 square feet of non-residential use within these communities. Updates to the General Plan Land Use Policy Map would:
 - Incorporate land use designations and densities for sites identified to accommodate the Regional Housing Assessment (RHNA) allocation in the adopted 2021-2029 Housing Element.
 - Incorporate designations to accommodate land uses proposed in developing the WSAP; and
 - Maintain consistency between zoning and land use policy. In addition to the identified Opportunity Sites, the WSAP Land Use Policy Map would modify designations for properties to reflect their current use and/or density where these, and the densities for sites identified by the Housing Element, deviate from those depicted by the current General Plan Policy Map.

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

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

III. CALIFORNIA ENVIRONMENTAL QUALITY ACT FINDINGS

Section 15091 of the CEQA Guidelines requires that a Lead Agency make a finding for each significant effect for the project. This section summarizes the significant environmental impacts of the project, describes how these impacts are to be mitigated, and discusses various alternatives to the proposed project, which were developed in an effort to reduce the remaining significant environmental impacts. All impacts are considered potentially significant prior to mitigation or a project revision through the incorporation of a standard condition of approval unless otherwise stated in the findings.

This remainder of this section is divided into the following subsections:

Section A, Issues Deemed “No Impact” or “Less Than Significant Impact,” presents topical areas that would result in no impact or less than significant impacts, as detailed in Chapter 5 of the Draft PEIR.

Section B, Impacts Mitigated to Less Than Significant, presents impacts that were determined to have a potentially significant impact that can be mitigated or avoided to less than significant.

Section C, Significant and Unavoidable Impacts that Cannot be Mitigated to Below the Level of Significance, presents significant impacts of the proposed project that were identified in the Draft PEIR, the findings for significant impacts, and the rationales for the findings.

Section IV, Alternatives to the Proposed Project, presents alternatives to the project and evaluates them in relation to the findings set forth in Section 15091(a)(3) of the State CEQA Guidelines, which allows a public agency to approve a project that would result in one or more significant environmental effects if the project alternatives are found to be infeasible because of specific economic, social, or other considerations.

Section V, Statement of Overriding Considerations, presents a description of the proposed project’s one significant and unavoidable adverse impact and the justification for adopting a statement of overriding considerations.

Based on the Final EIR discussion and analysis, the following is a summary of the environmental topics considered to have no impact, a less than significant impact, and a significant and unavoidable impact.

A. Issues Deemed to Have No Impact or Less than Significant Impact

No Impact

Pursuant to CEQA Guidelines Section 15060(d) and 15063 that allow a lead agency to skip preparation of an Initial Study and begin work directly on the EIR process, a NOP was issued without an accompanying Initial Study. In accordance with Section 15128 of the CEQA Guidelines, as described in Chapter 8, *Impacts Determined to be Less Than Significant*, of the Draft PEIR, the County concluded that project impacts related to the following topical environmental issues would result in no impact or would be less than significant. The County finds, based on substantial evidence in the record, that the proposed Project will have **no impacts** and require no mitigation measures with respect to the following issues:

- Agriculture and Forestry Resources (5.2-1, 5.2-2, 5.2-3, and 5.2-4)
- Hazards and Hazardous Materials (Impact 5.9-5)
- Mineral Resources (Impacts 5.12-1 and 5.12-2)
- Recreation (Impact 5.16-3)

Less Than Significant

This section identifies impacts of the proposed Project determined to be less than significant without implementation of project-specific mitigation measures. This determination, however, does assume compliance with Existing Regulations as detailed in Chapter 5 of the Final EIR. The County finds, based on substantial evidence in the record, that the proposed Project will have **less than significant impact** and require no mitigation measures with respect to the following issues:

- Aesthetics (Impact 5.1-1, 5.1-2, 5.1-3, 5.1-4, and 5.1-5; Cumulative Impacts)
- Air Quality (Impacts 5.3-1 and 5.3-4; Cumulative Impacts)
- Biological Resources (Impacts 5.4-1, 5.4-2, 5.4-3, 5.4-4, 5.4-6 and 5.4-7; Cumulative Impacts)
- Energy (Impacts 5.6-1 and 5.6-2; Cumulative Impacts)
- Geology and Soils (Impacts 5.7-1, 5.7-2, 5.7-3, and 5.7-4; Cumulative Impacts)
- Greenhouse Gas Emissions (Impact 5.8-1; Cumulative Impacts)
- Hazards and Hazardous Materials (Impacts 5.9-1, 5.9-2, 5.9-3, 5.9-4, 5.9-6, and 5.9-7; Cumulative Impacts)
- Hydrology and Water Quality (Impacts 5.10-1, 5.10-2, 5.10-3, 5.10-4, 5.10-5, 5.10-6, 5.10-7, 5.10-8; Cumulative Impacts)
- Land Use and Planning (Impacts 5.11-1, 5.11-2, and 5.11-3; Cumulative Impacts)
- Noise (Impact 5.13-3; Cumulative Impacts)
- Population and Housing (Impacts 5.14-1 and 5.14-2; Cumulative Impacts)

- Public Services (Impacts 5.15-1, 5.15-2, 5.15-3, 5.15-3, 5.15-4, 5.15-5, 5.15-6, and 5.15-7; Cumulative Impacts)
- Recreation (Impacts 5.16-1 and 5.16-2; Cumulative Impacts)
- Transportation (Impacts 5.17-1, 5.17-3, and 5.17-4; Cumulative Impacts)
- Utilities and Service Systems (Impacts 5.19-1, 5.19-2, 5.19-3, 5.19-4, and 5.19.5; Cumulative Impacts)
- Wildfire (Impacts 5.20-1, 5.20-2, 5.20-3, and 5.20-4; Cumulative Impacts)

B. Impacts Mitigated to Less than Significant

The County finds, based on substantial evidence in the record, that the proposed Project will have **impacts mitigated to less than significant** with the corresponding feasible mitigation measures provided in the Draft PEIR, with respect to the following issues:

1. Biological Resources

Environmental Impact:

The proposed Project would have a potentially significant impact related to biological resources as follows:

- **Impact 5.4-5:** The proposed Project could 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.

Mitigation Measures:

The following mitigation measures were included in the Draft PEIR and the Final EIR and are applicable to the proposed project. The measures as provided include any revisions incorporated in the Final EIR.

Impact 5.4-5 BIO-1: Construction, ground-disturbing activities, and vegetation removal for future projects resulting from the WSAP shall avoid activities during the general avian nesting season of February 15 through September 15. If construction of future projects that contain or are immediately adjacent to suitable nesting habitat must occur during the general avian nesting season, a pre-construction clearance survey shall be conducted within seven days prior to the start of construction activities to determine if any active nests or nesting activity is occurring on or within 500 feet of the project. If no sign of nesting activity is observed, construction may proceed without potential impacts to nesting birds. If an active nest is observed during the preconstruction clearance survey, an adequate buffer shall be established around the active nest depending on sensitivity of the species and proximity to project impact areas. Typical buffer distances include up to 300-feet for passerines and up to 500-feet for raptors but can be modified as deemed appropriate by a monitoring biologist. On-site construction monitoring may also be required, if recommended by a qualified

biologist, to ensure that no direct or indirect impacts occur to the active nest. Project activities may encroach into the buffer only at the discretion of the monitoring biologist. The buffer shall remain in place until the nest is no longer active as determined by the monitoring biologist.

2. Cultural Resources

Environmental Impact:

The proposed Project would have a potentially significant impact related to cultural resources as follows:

- **Impact 5.5-1:** Development of the project could impact an identified historic resource.
- **Impact 5.5-2:** Development of the project could impact archaeological resources.
- **Impact 5.5-3:** Grading activities could potentially disturb human remains.
- **Cumulative Impacts 5.5-4, 5.5-5, and 5.5-6**

Mitigation Measures:

The following mitigation measures were included in the Draft PEIR and the Final EIR and are applicable to the proposed Project. The measures as provided include any revisions incorporated in the Final EIR.

Impact 5.5-1 CUL-1: Prior to demolition or alteration of buildings and/or structures or the construction of aboveground infrastructure with potentially significant impacts on historic architectural resources, the project proponent shall retain an architectural historian meeting the minimum professional qualifications standards (PQS) set forth by the Secretary of the Interior (codified in 36 Code of Federal Regulations [CFR] Part 61; 48 Federal Register 44738–44739) (Qualified Architectural Historian) to conduct a historic resources assessment of affected properties. The assessment shall include a records search at the South Central Coastal Information Center or review of a prior record search conducted within the previous one year; a review of other pertinent archives and sources; a pedestrian field survey; recordation of all identified historic architectural resources on California Department of Parks and Recreation (DPR) 523 forms; evaluation of resources which may be eligible for listing in the California Register (i.e., meets the definition for historical resource in CEQA Guidelines Section 15064.5[a]), and for local listing; and preparation of a technical report documenting the methods and results of the assessment for each future project facilitated by WSAP measures and actions. If a historic architectural resource is found eligible by the Qualified Architectural Historian, then the Qualified Architectural Historian shall coordinate with the project proponent and County to ensure the project is constructed in conformance with the Secretary of the Interior’s Standards. All reports resulting from implementation of this measure shall be filed with the South Central Coastal Information Center (including but not limited to historic resources assessments and Secretary of the Interior’s Standards plan reviews).

Impact 5.5-2 CUL-2: Prior to conducting construction activities that would involve ground disturbance, future project proponents shall retain an archaeologist meeting the minimum PQS set forth by the Secretary of the Interior (codified in 36 CFR Part 61; 48 Federal Register 44738–44739) (Qualified Archaeologist) to conduct an archaeological resources assessment. The assessment shall include a records search at the South Central Coastal Information Center or review of a prior record search conducted within the previous one year; a Sacred Lands File search at the California Native American Heritage Commission (NAHC); geoarchaeological review including a focused assessment of land use history and any available geotechnical data to assess the potential for subsurface archaeological resources; a pedestrian field survey in instances where ground surface is exposed; recordation of all identified archaeological resources on DPR 523 forms; evaluation of resources affected by the project for eligibility for listing in the California Register (i.e., meets the definition for historical resource in CEQA Guidelines Section 15064.5[a]), and for local listing; and preparation of a technical report documenting the methods and results of the assessment. Resources that do not qualify as historical resources shall be considered by the Qualified Archaeologist for qualification as unique archaeological resources as defined in Public Resources Code Section 21083.2(g). The technical report also shall provide recommendations as to whether additional studies are warranted to further identify or evaluate archaeological resources (i.e., Extended Phase I boundary delineation, Phase II testing and evaluation) and if archaeological monitoring and Native American monitoring of ground disturbing activities is warranted (e.g., in areas where there is a higher potential to encounter buried resources). Prior to the initiation of field work for any Extended Phase I or Phase II investigation, the Qualified Archaeologist shall prepare a work plan outlining the investigation’s objectives, goals, and methodology. When developing a work plan for Native American resources, the County shall consult with local Native American tribes. If archaeological/Native American monitoring is warranted, the Qualified Archaeologist shall determine the locations and duration of monitoring and reporting requirements. All reports resulting from implementation of this measure shall be filed with the South Central Coastal Information Center (including but not limited to archaeological resources assessments, Extended Phase I and Phase II reports, and monitoring reports).

CUL-3: For projects with ground-disturbing activities that may encounter potentially significant archaeological resources, the Qualified Archaeologist shall implement a cultural resources sensitivity training program. The Qualified Archaeologist, or their designee, shall instruct all construction personnel of the types of archaeological resources that may be encountered, the proper procedures to be enacted in the event of an inadvertent discovery of archaeological resources or human remains, applicable laws protecting archaeological resources, and confidentiality of discoveries. Native American monitor(s) shall be invited to participate in presenting tribal perspectives as part of the training curriculum. In the event that construction crews are phased, additional trainings shall be conducted for new construction personnel. The project proponent or its contractors shall ensure construction personnel are made available for and attend the training. The project proponent shall retain documentation demonstrating attendance and provide it to the County.

CUL-4: In the event archaeological resources are encountered during construction of a future project, the project proponent shall cease all activity within 50 feet of the find. The discovery shall be evaluated for significance by the Qualified Archaeologist. When assessing significance and developing treatment for resources that are Native American in origin, the County shall consult with local Native American tribes. If the Qualified Archaeologist determines that the resource is significant—i.e., meets the definition for historical resource in CEQA Guidelines Section 15064.5(a) or for unique archaeological resource in Public Resources Code Section 21083.2(g)—the Qualified Archaeologist shall provide a method for avoidance and preservation in place, which shall be the preferred manner of mitigating impacts. If avoidance is infeasible, the Qualified Archaeologist shall develop a Phase III Archaeological Resources Data Recovery and Treatment Plan consistent with Mitigation Measure CUL-5. The Qualified Archaeologist also shall determine, based on the initial assessment of the discovery, whether the 50-foot buffer may be reduced. All reports resulting from implementation of this measure shall be filed with the South Central Coastal Information Center (including but not limited to Extended Phase I, Phase II, and Phase III reports).

CUL-5: Treatment of Archaeological Resources. If the assessment conducted under Mitigation Measure CUL-2 or Mitigation Measure CUL-4 identifies significant archaeological resources—i.e., meets the definition for historical resource in CEQA Guidelines Section 15064.5(a) or for unique archaeological resource in Public Resources Code Section 21083.2(g)—then avoidance and preservation in place shall be the preferred manner of mitigating impacts. Preservation in place may be accomplished by, but is not limited to, avoidance, incorporating the resource into open space, capping, or deeding the site into a permanent conservation easement. If avoidance and preservation in place of significant archaeological resources is determined by the County to be infeasible, then the Qualified Archaeologist shall prepare a Phase III Archaeological Resources Data Recovery and Treatment Plan. The plan shall include: a detailed research design; justification for data recovery or other treatment methods depending on the nature of the resource's eligibility; excavation methodology; and, reporting and curation requirements. When developing treatment for resources that are Native American in origin, the County shall consult with local Native American tribes. All Phase III reports resulting from implementation of this measure shall be filed with the South Central Coastal Information Center.

CUL-6: Disposition of Native American archaeological materials shall be determined by the County in coordination with local California Native American tribes. Disposition of materials may include curation at an accredited or nonaccredited repository, onsite or offsite reburial, and/or donation to a local tribe or public, nonprofit institution with a research interest in the materials, or local school or historical society in the area for educational purposes. The County shall consider tribal preferences when making a determination of disposition of Native American archaeological materials. Disposition of Native American human remains and associated funerary objects or grave goods (i.e., artifacts associated with human

remains) shall be determined by the landowner in consultation with the County and the Most Likely Descendant. The project proponent shall curate all significant historic period archaeological material, or portions thereof at the discretion of the Qualified Archaeologist, at a repository accredited by the American Association of Museums that meets the standards outlined in 36 CFR Section 79.9. If no accredited repository accepts the collection, then the project proponent may curate it at a nonaccredited repository as long as it meets the minimum standards set forth in 36 CFR Section 79.9. If neither an accredited nor a nonaccredited repository accepts the collection, then the project proponent may offer the collection to a public, nonprofit institution with a research interest in the materials, or to a local school or historical society in the area for educational purposes.

Impact 5.5-3: CUL-7: If human remains are encountered, then the project proponent or its contractor shall immediately halt work within 50 feet of the discovery and contact the Los Angeles County Coroner in accordance with Public Resources Code Section 5097.98 and Health and Safety Code Section 7050.5, which require that no further disturbance shall occur until the County Coroner has made the necessary findings as to the remains' origin and disposition. If the County Coroner determines that the remains are Native American, then the County Coroner will notify the NAHC within 24 hours in accordance with Health and Safety Code Section 7050.5(c), and Public Resources Code Section 5097.98. The NAHC shall then identify the person(s) thought to be the most likely descendant (MLD). The MLD may, with the permission of the land owner, or their authorized representative, inspect the site of the discovery of the Native American remains and may recommend to the owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The MLD shall complete their inspection and make their recommendation within 48 hours of being granted access by the landowner to inspect the discovery. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials. The project proponent, County, and landowner shall discuss and confer with the MLD on all reasonable options regarding the MLD's preferences for treatment. Until the project proponent, County, and landowner have conferred with the MLD, the contractor shall ensure that the immediate vicinity where the discovery occurred is not disturbed by further activity and is adequately protected according to generally accepted cultural or archaeological standards or practices (e.g., the NAHC's "A Professional Guide for the Preservation and Protection of Native American Human Remains and Associated Grave Goods" [2022], which reiterates statutory requirements), and that further activities take into account the possibility of multiple burials. If the NAHC is unable to identify an MLD; or the MLD identified fails to make a recommendation; or the landowner rejects the recommendation of the MLD and the mediation provided for in Public Resources Code Section 5097.94(k), if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.

Cumulative Impacts 5.5-4, 5.5-5, and 5.5-6 See mitigation measures CUL-2 through CUL-6 above.

3. Geology and Soils

Environmental Impact:

The proposed Project would have a potentially significant impact related to geology and soils as follows:

- **Impact 5.7-5:** The proposed Project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Mitigation Measures:

The following mitigation measures were included in the Draft PEIR and the Final EIR and are applicable to the proposed project. The measures as provided include any revisions incorporated in the Final EIR.

Impact 5.7-5 GEO-1: For projects facilitated by the WSAP that involve ground disturbance, the project proponent shall retain a paleontologist who meets the Society of Vertebrate Paleontology's (SVP 2010) definition for qualified professional paleontologist (Qualified Paleontologist) to prepare a paleontological resources assessment report prior to the start of construction activities. The report shall include methods and results of the paleontological resources assessment, monitoring requirements (including depths, frequency, and reporting), and maps that outline where monitoring is required. Monitoring shall follow SVP Guidelines: no monitoring of ground-disturbing activities in units of Low Sensitivity or No Potential; monitoring of all ground-disturbing activities (with depths specified) in units of Low to High Significance; and at all depths in units of High Significance unless the Qualified Paleontologist's report identifies previous disturbances or the use of construction methods that do not warrant monitoring; and monitoring at the initiation of excavation in units of Undetermined Significance. The report also shall stipulate whether screen washing is necessary to recover small specimens following SVP Guidelines and determine whether unique geologic features are present on-site. If monitoring is conducted, then the Qualified Paleontologist shall prepare a final report summarizing monitoring results and submit it to the project proponent and the County.

GEO-2: Prior to the start of ground-disturbing activities for projects facilitated by the WSAP with potentially significant impacts on paleontological resources, the Qualified Paleontologist or its designee shall conduct construction worker paleontological resources sensitivity training (or may be provided via digital recording) for all construction workers. Construction workers shall be informed on how to identify the types of paleontological resources that may be encountered, the proper procedures to be enacted in the event of an inadvertent discovery of paleontological resources, and safety precautions to be taken when working with paleontological monitors. The project proponent shall ensure that construction workers are made available for and attend the training. The project proponent shall retain documentation demonstrating attendance and provide it to the County.

GEO-3: If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. An appropriate buffer area determined by the paleontological monitor shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the monitor's discretion, and to reduce any construction delay, the grading/excavation contractor shall assist, where feasible, in removing rock/sediment samples for initial processing and evaluation. If a fossil is determined to be significant, the Qualified Paleontologist shall implement a paleontological salvage program to remove the resources from their location, following the guidelines of the SVP (2010). Any fossils encountered and recovered shall be prepared to the point of identification, catalogued, and curated at a public, nonprofit institution with a research interest in the material and with retrievable storage, such as the County Natural History Museum, if such an institution agrees to accept the fossils. Accompanying notes, maps, and photographs shall also be filed at the repository. If no institution accepts the fossil collection, it may be donated to a local school or other interested organization in the area for educational purposes. If construction workers discover any potential fossils during construction while the paleontological monitor is not present, regardless of the depth of work or location, work at the discovery location shall cease in a 50-foot radius of the discovery until the Qualified Paleontologist has assessed the discovery and recommended and implemented appropriate treatment as described earlier in this measure. Any salvage reports resulting from implementation of this measure shall be filed with the County Natural History Museum.

4. Tribal Cultural Resources

Environmental Impact:

The proposed Project would have a potentially significant impact related to tribal cultural resources as follows:

- **Impact 5.18-1:** The proposed Project would cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources as defined in Public Resources Code section 5020.1(k).
- **Impact 5.18-2:** The proposed Project would cause a substantial adverse change in the significance of a tribal cultural resource that is determined by the lead agency to be significant pursuant to criteria in Public Resources Code section 5024.1(c).
- **Cumulative Impacts 5.18-3**

Mitigation Measures:

The following mitigation measures were included in the Draft PEIR and the Final EIR and are applicable to the proposed project. The measures as provided include any revisions incorporated in the Final EIR.

Impact 5.18-1 See mitigation measures CUL-2 through CUL-6 above.

Impact 5.18-2 See mitigation measures CUL-2 through CUL-6 above.

Cumulative Impacts 5.18-3 See mitigation measures CUL-2 through CUL-6 above.

C. Significant and Unavoidable Impacts that Cannot be Mitigated to Below the Level of Significance

The following summary describes unavoidable adverse impacts of the proposed Project, even with the implementation of feasible mitigation measures, or where either mitigation measures were found to be infeasible. The County finds, based on substantial evidence in the record, that the proposed Project will have **significant and unavoidable impacts** in the following issues:

- Air Quality (Impact 5.3-2 and 5.2-3; Cumulative Impacts)
- Noise (Impacts 5.13-1, 5.13-2; Cumulative Impacts)
- Transportation (Impact 5.17-2; Cumulative Impacts)

Findings Regarding Significant and Unavoidable Impacts

In accordance with PRC Section 21081 and State CEQA Guidelines Section 15091, the County adopts one or more of the three possible findings for each significant impact. These findings are provided below and will be used hereinafter and referenced as identified below:

- **CEQA Finding 1.** Changes or alterations have been required in, or incorporated into, the proposed Project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR (State CEQA Guidelines Section 15091[a][1]).
- **CEQA Finding 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 (State CEQA Guidelines Section 15091 [a][2]).
- **CEQA Finding 3.** Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible, the mitigation measures or project alternatives identified in the final EIR (State CEQA Guidelines Section 15091 [a][3]).

CEQA requires that the lead agency adopt mitigation measures or alternatives, where feasible, to substantially lessen or avoid significant environmental impacts that would otherwise occur. However, project modification or alternatives are not required where such changes are infeasible, as stated in State CEQA Guidelines Section 15091(a)(3). State CEQA Guidelines Section 15364 defines "feasible" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, legal, and technological factors."

For those significant impacts that cannot be mitigated to a less than significant level, a public agency, after adopting proper findings, may nevertheless approve the project if the agency first adopts a statement of overriding considerations setting forth the specific reasons why the agency found that the

project's "benefits" rendered "acceptable" its "unavoidable adverse environmental effects" (State CEQA Guidelines Sections 15093 and 15043[b]; see also PRC Section 21081[b]).

The following significant environmental impacts of the proposed Project are unavoidable and cannot be feasibly or effectively mitigated to a less than significant level. In accordance with Section 15093 of the State CEQA Guidelines, a Statement of Overriding Considerations is set forth below in Section VII to substantiate the County's decision to accept these unavoidable substantial, adverse environmental effects because of the benefits afforded by the Project.

For each proposed Project resource category discussed below, the following sections are provided:

- **Impact:** A specific description of the significant environmental impact(s) identified in the Draft PEIR.
- **Mitigation:** Identified feasible mitigation measures that are required as part of the proposed Project. (If mitigation is infeasible, the reasons supporting the finding that mitigation is infeasible are discussed below under "Facts in Support of Findings.")
- **Finding:** One or more of the three specific findings set forth in State CEQA Guidelines Section 15091.
- **Facts in Support of Finding:** A summary of the reasons for the finding(s) is provided for each impact. Additional substantiation regarding the feasibility (or infeasibility) of mitigation is provided at the end of this section (which is relevant to all impacts under the given resource category).

1. Air Quality

Environmental Impact:

The Project would have a significant and unavoidable impact related to air quality as follows:

- **Impact 5.3-2:** Construction of the proposed Project could result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment under an applicable federal or state ambient air quality standard.
- **Impact 5.3-3:** Construction of the proposed Project could expose sensitive receptors to substantial pollutant concentrations.

Mitigation Measures:

Impact 5.3-2: AQ-1: In accordance with South Coast Air Quality Management District (South Coast AQMD) Rule 403, the County shall require the following measures to be taken during the construction of all future development projects to reduce the amount of dust and other sources of particulate matter:

- Water exposed soils at least three times daily and maintain equipment and vehicle engines in good condition and in proper tune.
- Wash off trucks leaving development sites and water down all construction areas.

- Replace ground cover on construction sites if it is determined that the site will be undisturbed for lengthy periods.
- Reduce speeds on unpaved roads to less than 15 miles per hour.
- Halt all grading and excavation operations when wind speeds exceed 25 miles per hour.
- Properly maintain diesel-powered on-site mobile equipment.
- Install particulate filters on off-road construction equipment.
- Sweep streets at the end of the day if substantial visible soil material is carried over to the adjacent streets.
- Cover all trucks hauling dirt, sand, soil, or other loose material to and from the site.
- Limit truck construction traffic to non-peak times of the morning or afternoon.
- Use surfactants and other chemical stabilizers to suppress dust at construction sites.
- Use wheel washers for construction equipment.

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

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

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

Impact 5.3-3: See mitigation measures AQ-1 and AQ-2 above.

Findings: The County hereby adopts CEQA Findings 1 and 3.

Facts in Support of Findings:

Impact 5.3-2:

- **Construction:** Construction activities associated with buildout of the WSAP could generate short-term emissions that exceed the South Coast AQMD's regional significance thresholds. Mitigation Measures AQ-1 and AQ-2 would reduce fugitive dust and exhaust emissions during construction activities to the extent feasible. However, even with implementation of these measures, future development projects under the WSAP may be large enough in scale or intensity that emissions could continue to exceed the South Coast AQMD significance thresholds. Therefore, Impact 5.3-2 for construction is **significant and unavoidable**.
- **Operation:** Development associated with buildout of the WSAP would generate long-term emissions that exceed the South Coast AQMD's regional significance thresholds. Policies identified in the WSAP would minimize long-term air quality impacts. However, no additional feasible mitigation measures have been identified that would reduce long-term operational emissions associated with future residential and commercial land use to less than significant levels. Therefore, Impact 5.3-2 for operation is **significant and unavoidable**.

Impact 5.3-3:

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

Cumulative Impacts:

- **Construction:** The SoCAB is designated nonattainment for O₃, PM_{2.5}, and lead (Los Angeles County only) under the California and National AAQS and nonattainment for NO₂ and PM₁₀ under the California AAQS. Construction of cumulative projects would further degrade the regional and local air quality. Air quality would be temporarily impacted during construction activities. As discussed above in Impact 5.3-2 and Impact 5.3-3, future development facilitated by adoption of the WSAP may result in regional and localized emissions that could exceed the South Coast AQMD significance thresholds during construction. In addition, construction activities associated with the development of individual projects under the WSAP may exceed cancer risk significance thresholds. Therefore, the cumulative impact would be significant and unavoidable.
- **Operation:** For operational air quality emissions, any project that does not exceed or can be mitigated to less than the daily regional and/or cancer risk threshold values is not considered a substantial source of air pollution by the South Coast AQMD and does not add significantly to a cumulative impact. As discussed above in Impact 5.3-2, future development facilitated by adoption

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

2. Noise

Environmental Impact:

The proposed Project would have a significant and unavoidable impact related to noise as follows:

- **Impact 5.13-1:** The proposed Project could result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
- **Impact 5.13-2:** The proposed Project could result in generation of excessive ground-borne vibration or ground-borne noise levels.

Mitigation Measures:

Impact 5.13-1 N-1: Construction Noise. Applicants for future development projects pursuant to implementation of the Westside Area Plan that are within 500 feet of sensitive receptors (e.g., residences, hospitals, schools) shall submit a noise study to the Los Angeles County Department of Public Health (DPH) for review and approval prior to issuance of a grading or building permit. The study shall include noise-reduction measures, if necessary, to ensure project construction noise will be in compliance with the County Noise Ordinance standards (i.e., LACC 12.08.440). All noise-reduction measures approved by DPH shall be incorporated into appropriate construction-related plans (e.g., demolition plans, grading plans and building plans) and implemented during construction activities. Potential noise-reduction measures may include, but are not limited to, one or more of the following, as applicable to the project:

- Install temporary sound barriers for construction activities that occur adjacent to occupied noise-sensitive receptors.
- Equip construction equipment with effective mufflers, sound-insulating hoods or enclosures, vibration dampers, and other Best Available Control Technology (BACT).
- Limit non-essential idling of construction equipment to no more than five minutes per hour.

This mitigation measure shall not apply and is superseded once a Countywide noise ordinance goes into effect that establishes construction noise standards for noise-reduction measures that ensures project construction noise compliance with the County Noise Ordinance standards (i.e., LACC 12.08.440) for development projects within the Westside Planning Area.

N-2: Operational Noise. Prior to issuance of a building permit for any future discretionary development projects within the Westside Planning Area that are located within 500 feet of sensitive receptors, project applicant shall submit a noise mitigation plan to DPH for review and approval. The noise mitigation plan shall be prepared by a sound engineer and be sufficient for DPH to make a determination of whether the project will be in compliance with all applicable County Noise standards and regulations. At minimum, the noise mitigation plan shall include the following information: a list of all electro-mechanical equipment (HVAC, refrigeration systems, generators, etc.) that will be installed at the project site; sound level that would be produced by each equipment; noise-reduction measures, as necessary; and sufficient predictive analysis of project operational noise impact. All noise-reduction measures approved by DPH shall be incorporated into the project building plans and be implemented during project construction. Potential noise-reduction measures may include, but are not limited to, one or more of the following, as applicable to the project:

- Install permanent noise-occluding shrouds or screens on operating equipment.
- Maintain all equipment and noise control features in accordance with the manufacturer's specifications.
- Orient equipment vents and other sources of sound emissions away from noise-sensitive receptors and/or behind structures, containers, or natural features.
- Increase distance between the operating equipment and the noise-sensitive receptor(s) of concern, to the maximum extent feasible.
- Install portable sound-occluding barriers to attenuate noise between the source(s) and the noise-sensitive receptor(s).

This mitigation measure shall not apply and is superseded once a Countywide noise ordinance goes into effect that establishes noise standards for commercial and mixed-use projects within the Planning Area.

N-3: Construction Vibration. For future development projects that utilize vibration-intensive construction equipment (e.g., pile drivers, jack hammers, and vibratory rollers) within 300 feet of sensitive receptors within the Planning Area, project applicant shall submit a vibration impact evaluation to DPH for review and approval prior to issuance of a grading or building permit. The evaluation shall include a list of project construction equipment and the associated vibration levels and a predictive analysis of potential project vibration impacts. If construction-related vibration is determined to be perceptible at vibration-sensitive uses (i.e., exceed the County's standard of 0.01 inches per second RMS vibration velocity [within the range of 1 to 100 Hz frequency]), project-specific measures shall be required to ensure project compliance with vibration standards. All project-specific measures approved by DPH shall be incorporated into appropriate construction-related plans (e.g., demolition plans, grading plans and building plans) and implemented during project construction.

Examples of equipment vibration source-to-receptor distances at which impact evaluation should occur vary with equipment type (based on FTA reference vibration information) and are as follows:

- Jackhammer: 23 feet
- Dozer, hoe-ram, drill rig, front-end loader, tractor, or backhoe: 43 feet
- Roller (for site ground compaction or paving): 75 feet
- Impact pile-driving: 280 feet

This mitigation measure shall not apply and is superseded once a Countywide ground-borne vibration ordinance goes into effect that establishes construction ground-borne vibration standards for vibration-reduction measures that ensures project construction ground-borne vibration compliance with the County standard of 0.01 inches per second RMS vibration velocity [within the range of 1 to 100 Hz frequency] for development projects within the Planning Area.

Impact 5.13-2 See mitigation measures N-1 and N-2 above.

Findings: The County hereby adopts CEQA Findings 1 and 3.

Facts in Support of Findings:

Impact 5.13-1

- The proposed Project would result in future development projects with associated construction activities, which, depending on the type of residential receptor and relevant screening distance, and assuming daytime construction only, could result in significant impacts relative to an exceedance of the County construction noise threshold to off-site sensitive receptors. Mitigation Measure N-1 would reduce impacts associated with construction and operational activities. However, because of the potential for construction activities to occur near sensitive uses, and because of the potential intensity of construction activities, it may not be feasible to reduce the impact to a less-than-significant level, and the impact would remain significant and unavoidable. No additional feasible mitigation measures have been identified to further reduce incremental contributions to significant noise impacts. Noise barriers are not always capable of blocking noise at noise-sensitive receptors, particularly those that are elevated above a construction work site, such as residential units that are upgrade of a specific project site. It may not be feasible in all circumstances to install noise barriers with sufficient height to block the line-of-sight for all noise-sensitive receptors due to barrier foundation and wind load restrictions. Therefore, construction noise impacts would be significant and unavoidable.
- The proposed Project would result in future development within the Planning Area that could introduce new stationary sources of noise. The development of residential and non-residential uses under the WSAP could generate substantial stationary noise. Such sources could generate noise from heating, ventilation, and air conditioning (HVAC) mechanical equipment, back-up diesel generators in some cases, parking lot activity, backup beepers from internal truck and equipment maneuvering, and other sources. Mitigation Measure N-2 would reduce impacts associated with stationary-source noise, but because exterior noise levels may still exceed the

County's noise land use compatibility criteria despite exterior noise attenuation (i.e., noise controls, sound walls, and/or berms), the impact would remain significant and unavoidable.

- The proposed Project would result in future development projects with associated construction activities, which, depending on the type of residential receptor and relevant screening distance, and assuming daytime construction only, could result in significant impacts relative to an exceedance of the County construction noise threshold to off-site sensitive receptors. Mitigation Measure N-3 would reduce ground-borne vibration impacts associated with construction activities. Further reductions of vibration impacts from a construction site could be achieved with the installation of a wave barrier, which is typically a trench or a thin wall made of sheet piles installed in the ground (essentially a subterranean sound barrier to reduce noise). However, wave barriers must be very deep and long to be effective and are not considered feasible for temporary applications, such as a typical land use development project (Caltrans 2020). Per the Caltrans *Transportation and Construction Vibration Guidance Manual*, the wave barrier would need to be at least two-thirds of the seismic wavelength, and the length of the barrier must be at least one wavelength (typical wavelength can be up to 500 feet). In addition, constructing a wave barrier to reduce a project's construction-related vibration impacts would, in and of itself, generate ground-borne vibration from the excavation equipment. In addition, it may not be possible in all circumstances to prohibit the use of construction equipment within certain distances of sensitive receptors because such equipment would be required to construct the various components of a project at the proposed locations. Thus, it is concluded that there are no feasible mitigation measures that could be implemented to reduce the temporary vibration impacts from on-site construction. Therefore, vibration impacts from construction activities would be significant and unavoidable.

Cumulative Impacts:

- **Construction:** With respect to construction, an increase in noise at sensitive uses would occur as a result of the construction of specific development projects allowed under the proposed Project along with other construction in the vicinity. Where projects in the vicinity adjoin the construction of specific development projects allowed under the proposed Project, the combined construction noise levels would have a cumulative effect on nearby sensitive uses. Noise is not strictly additive, and a doubling of noise sources would not cause a doubling of noise levels but would result in a 3 dBA increase over a single source. However, cumulative construction noise levels could be in excess of the County's noise standards, thus potentially resulting in a cumulative construction noise impact. Determining the exact location and potential noise levels of future construction activities would be considered speculative at this time. Further, construction noise levels would be considered a temporary nuisance, as the increase in noise levels would only occur during the use of construction equipment associated with each specific development project. As discussed earlier, construction at each site within the Planning Area will be required to comply with the County's noise ordinance. Nonetheless, it is possible that construction of future projects under the WSAP and other projects in the vicinity could occur at the same time and in proximity to each other and sensitive receptors. Therefore, cumulative construction noise impacts could be potentially significant despite implementation of Mitigation Measure N-1. Cumulative impacts during construction are considered significant and unavoidable.

- **Operation:** Permanent increases in noise would occur primarily as a result of increased traffic on local roadways due to development under the proposed Project and ambient growth throughout the region. Related development in adjacent jurisdictions may contribute traffic to the roadway network. Although it is not anticipated, roadway volumes under the 2045 with-Project scenario compared to existing conditions have the potential to be doubled. Therefore, there is a potential for an increase of 3 dBA when compared to existing conditions. As a result, it is reasonably determined that projects facilitated by adoption of the WSAP have the potential to result in a cumulatively considerable increase in traffic noise impacts, and such impacts would be cumulatively significant. With respect to stationary operational noise, an increase in noise at sensitive uses would occur as a result of the operation of specific development projects allowed under the proposed Project along with other projects in the vicinity. Where projects in the vicinity adjoin the operation of specific development projects allowed under the proposed Project, the combined operational noise levels would have a cumulative effect on nearby sensitive uses. Noise is not strictly additive, and a doubling of noise sources would not cause a doubling of noise levels but would result in a 3 dBA increase over a single source. However, cumulative operational noise levels could be in excess of the County's noise standards, thus potentially resulting in a cumulative operational noise impact.
- Determining the exact location and potential noise levels of future operational activities would be considered speculative at this time. Stationary operational noise sources at each site within the Planning Area will be required to comply with the County's noise ordinance. Nonetheless, it is possible that the operation of future projects under the WSAP and other projects in the vicinity could occur in proximity to each other and sensitive receptors. Therefore, the cumulative stationary operational noise impacts could be potentially significant. Despite implementation of Mitigation Measures N-1 and N-2, cumulative impacts would remain significant and unavoidable. As such, cumulative impacts during future operations are considered significant and unavoidable.

Impact 5.13-2

- The proposed Project would result in future development projects with associated construction activities, which, depending on the type of residential receptor and relevant screening distance, and assuming daytime construction only, could result in significant impacts relative to an exceedance of the County construction noise threshold to off-site sensitive receptors. Mitigation Measure N-1 would reduce impacts associated with construction and operational activities. However, because of the potential for construction activities to occur near sensitive uses, and because of the potential intensity of construction activities, it may not be feasible to reduce the impact to a less-than-significant level, and the impact would remain significant and unavoidable. No additional feasible mitigation measures have been identified to further reduce incremental contributions to significant noise impacts. Noise barriers are not always capable of blocking noise at noise-sensitive receptors, particularly those that are elevated above a construction work site, such as residential units that are upgrade of a specific project site. It may not be feasible in all circumstances to install noise barriers with sufficient height to block the line-of-sight for all noise-sensitive receptors due to barrier foundation and wind load restrictions. Therefore, construction noise impacts would be significant and unavoidable.

- The proposed Project would result in future development within the Planning Area that could introduce new stationary sources of noise. The development of residential and non-residential uses under the WSAP could generate substantial stationary noise. Such sources could generate noise from heating, ventilation, and air conditioning (HVAC) mechanical equipment, back-up diesel generators in some cases, parking lot activity, backup beepers from internal truck and equipment maneuvering, and other sources. Mitigation Measure N-2 would reduce impacts associated with stationary-source noise, but because exterior noise levels may still exceed the County's noise land use compatibility criteria despite exterior noise attenuation (i.e., noise controls, sound walls, and/or berms), the impact would remain significant and unavoidable.

Cumulative Impacts:

- Past, present, and reasonably foreseeable future projects, including projects implemented in accordance with the WSAP and municipal code requirements, have affected and can be expected to continue to affect vibration levels in the unincorporated areas. Construction and operation of projects facilitated by adoption of the WSAP could combine with the incremental vibration impacts of other cumulative projects, which may include truck and bus routes; projects near active railroad tracks (within 200 feet, according to the FTA's vibration screening distances); projects that use construction vehicles or heavy-duty construction equipment typically associated with substantial vibrational impacts (such as pile drivers, jackhammers, impact hammers, and earth compaction tools), or could cause or contribute to a significant impact related to localized ground-borne vibration and/or ground-borne noise, and thus, disturb nearby receptors or cause structural damage.
- Determining the exact location and potential noise levels of future operational activities would be considered speculative at this time. Nonetheless, it is possible that construction of future projects under the WSAP and other projects in the vicinity could occur at the same time and in proximity to each other and sensitive receptors. Despite implementation of Mitigation Measure N-3, cumulative impacts during construction would remain significant and unavoidable. Therefore, cumulative construction vibration impacts are considered significant and unavoidable.

3. Transportation Impact 5.17-2

Environmental Impact:

The proposed Project would have a significant and unavoidable impact related to transportation as follows:

- **Impact 5.17-2:** The proposed Project could conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b).

Mitigation Measures:

Impact 5.17-2 T-1: VMT Reduction Projects. The County will work with State, regional, and local agencies to reduce regional VMT. Land use policies in the WSAP to improve and/or expand transit service, bicycle and pedestrian facilities, and transportation projects will help the region to achieve the projected decreases in regional VMT. The County

will also collaborate with State and other agencies to explore the feasibility of new programs for reducing VMT, such as VMT fees.

T-2: TDM Strategies. Implementation of TDM strategies, where feasible and necessary based on project- and site-specific considerations, may include but are not limited to those identified below:

1. Implement Commute Trip Reduction Marketing
2. Provide Ridesharing Program
3. Implement Subsidized or Discounted Transit Program
4. Provide End-of-Trip Bicycle Facilities
5. Provide Employer-Sponsored Vanpool
6. Limit Residential Parking Supply
7. Unbundle Residential Parking Costs from Property Cost
8. Implement Transit-Supportive Roadway Treatments

Findings: The County hereby adopts CEQA Findings 1 and 3.

Facts in Support of Findings:

Impact 5.17-2:

- The proposed Project would result in future development within the Planning Area resulting in an increase in service population anticipated from buildout in the 2045 with Project scenario, and land uses within the Planning Area compared to the Countywide average, the proposed Project would result in significant and unavoidable impacts related to increases in VMT at the project level and cumulatively after implementation of Mitigation Measures T-1 and T-2. The implementation of these mitigation measures would reduce impacts related to VMT but would not result in a reduction of Planning Area VMT per capita below the County's significant threshold of 16.8 percent below existing conditions. Mitigation Measure T-1 requires the County to ensure implementation of the WSAP's policies related to VMT reduction and to work with State, regional, and local agencies for implementation of those policies as well as potential future VMT mitigation strategies. Mitigation Measure T-2 requires implementing agencies and project sponsors to incorporate TDM strategies in all future projects, when feasible, based on project- and site-specific considerations to reduce regional VMT.

Cumulative Impacts:

- The geographic scope for traffic includes cumulative growth projections for Los Angeles County that are reflected in the SCAG RTP/SCS. The WSAP buildout scenario demonstrates a project impact after applying an efficiency based VMT threshold in the Project VMT Impacts section. Although it is consistent with SCAG RTP/SCS in network and zoning, it reallocates population/employment growth and reflects a greater amount of service population overall than is assumed in the SCAG RTP/SCS in the area, and therefore requires cumulative impact analysis. The cumulative impact analysis entails comparing the cumulative "no project" scenario, representing RTP/SCS cumulative year conditions, to the cumulative "plus project" scenario,

representing reallocation of the population/employment growth associated with the WSAP to the area.

- While the proposed Project may result in cumulatively considerable significant impacts to VMT per service population, the cumulative impact of the proposed Project traffic along with other regional growth would be reduced through Mitigation Measures T-1 and T-2, along with regional programs that are the responsibility of other agencies, such as cities within the Planning Area and Caltrans. In addition, as described above, the goals and policies of the proposed Project would result in a decrease in VMT per capita by prioritizing transit-oriented development, mixed use development, and safe and accessible multi-modal transportation circulation improvements. Future plans and programs implemented by cities in the Planning Area would also be subject to the State and regional policies that encourage or require similar improvements and reductions in VMT per capita and per service population. However, if these programs and policies are not implemented by the agencies with the responsibility to do so, the cumulative transportation and traffic impacts would remain significant and unavoidable. Under these circumstances, the proposed Project could result in a cumulatively significant traffic impact that may remain significant and unavoidable.

IV. ALTERNATIVES TO THE PROPOSED PROJECT

A. Alternatives Considered and Rejected During the Scoping/Project Planning Process

The following is a discussion of the alternatives considered during the scoping and planning process and the reasons why they were not selected for detailed analysis in the EIR. In addition to these alternatives considered but rejected, a number of other alternative sites were recommended by commenters during the public comment period. The County has rejected all recommended sites for reasons clearly detailed in the Final EIR (see Master Response 1, Opportunity Sites).

Additional Opportunity Sites for Land Use and Zoning Changes

While the WSAP addresses each of its unincorporated communities, its focus is on Ladera Heights, View Park-Windsor Hills, and West Fox Hills, as the remaining areas are managed through other plans, agencies, or agreements. The Ballona Wetlands is a significant ecological resource owned by the state of California, managed by the California Department of Fish and Wildlife, and subject to an ongoing multiagency restoration project. Determination of Marina del Rey's future uses and improvements will be the subject of a separate planning process recently initiated by the Los Angeles County Department of Beaches and Harbors. The unincorporated area of West LA (Sawtelle VA) is owned by and subject to the jurisdiction of the federal government and is currently undergoing a separate master plan effort. Gilmore Island, a small unincorporated parcel of land in the Fairfax neighborhood of the City of Los Angeles, is occupied by a parking lot integrated cohesively within the overall CBS Television City studio complex. Franklin Canyon is largely undevelopable due to its environmental setting, natural resources, and fire hazards and is mostly used as parkland and trails managed by the Mountains Recreation and Conservation Authority. Therefore, WSAP focuses primarily on land use and zoning changes within Ladera Heights, View Park, Windsor Hills, and West Fox Hills.

During development of the WSAP, the County identified a number of locations—in addition to the 12 Opportunity Sites—that might be considered for land use and zoning changes (thereby providing for increased residential density). This included additional opportunity sites (1a, 4c, and 6b), and a larger Opportunity Site 5 (see Figure 7-1 of the Draft PEIR, *Additional Opportunity Sites*). Site 1a was at Centinela Avenue/Green Valley Court at the location of an existing storage facility. Site 4c was south of the commercial frontage on Slauson Avenue at Fairfax Avenue at the location of existing church parking lots. Site 6b was the southern part of Site 6 south of Slauson Avenue at Overhill Drive with existing commercial uses. Part of Opportunity Site 5 extended south of Slauson Avenue at Heatherdale Avenue and is developed with commercial uses.

These opportunity sites were shared with the community during a series of public input meetings. Through the WSAP development process, further County consideration of the goals and policies of the WSAP, and as a result of public feedback received, these sites were eliminated from the WSAP as opportunity sites. It was determined through WSAP development that these sites were not necessary in order to accommodate the Regional Housing Needs Assessment (RHNA) allocation or did not otherwise meet criteria defined in the Housing Element, consistent with the Housing Element. In addition, by including these additional opportunity sites, this alternative would result in greater significant environmental impacts related to air quality, noise, and transportation.

Although the Additional Opportunity Sites Alternative would generally meet the objectives of the proposed Project, for the reasons listed above, the Additional Opportunity Sites Alternative was considered but rejected from further evaluation within this Draft PEIR.

Reduced Density Below Housing Element/Regional Housing Needs Assessment

The County considered an alternative that would reduce the amount of residential dwelling units below the Regional House Needs Assessment (Reduced RHNA Density Alternative) allocation. A reduction in dwelling units that would be facilitated by the WSAP would be an appropriate means of reducing significant impacts. All identified significant and unavoidable impacts of the WSAP (air quality, noise, and transportation) would be incrementally reduced by a reduction in housing unit capacity at buildout of zoning code.

However, a potential alternative that would diminish the capacity of the Planning Area to accommodate housing units was determined to be infeasible because implementation of the Housing Element and RHNA requirements is mandated by the State of California and must be implemented. The California Department of Housing and Community Development (HCD) is responsible for determining the regional housing needs assessment (segmented by income levels) for each region's council of governments (COG), which is the Southern California Association of Governments (SCAG) for the County of Los Angeles. HCD starts with demographic population information from the California Department of Finance and uses a formula to calculate a figure for each region of the State. Once HCD and the COG have agreed to a region's assessment figure (the amount of housing that must be planned for), the COG takes over and is responsible for allocating the housing needs amongst all the jurisdictions (cities/counties) within that region. The COG does this in a RHNA Plan. All jurisdictions are required to plan for their RHNA allocation, and there are penalties from the State for not accommodating the required allocation of housing SCAG provides one RHNA for all unincorporated areas. Therefore, the amount of housing anticipated through the implementation of

the WSAP would satisfy the requirement of the Housing Element/RHNA and cannot be feasibly reduced, even if such reductions would reduce or eliminate significant environmental impacts.

For the reasons listed above, the Reduced RHNA Density Alternative was considered but rejected from further evaluation within this Draft PEIR.

B. Alternatives Selected For Further Analysis

The following alternatives were determined to represent a reasonable range of alternatives with the potential to feasibly attain most of the basic objectives of the project but avoid or substantially lessen any of the significant effects of the project.

No Project/Existing General Plan Alternative

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

Future development under the No Project Alternative would continue to be guided by the County’s existing General Plan land use and the recently adopted Housing Element Update; however, no specific land use or zoning designations were approved as part of that process. The No Project Alternative would result in the continuation of existing conditions (7,735 existing households) and planned development within the Planning Area (567 households). The Planning Area currently has 7,735 households, 18,270 residents, and 4,585 jobs. No land use or zoning amendments would be processed under this alternative. Alternative 1 would result in a planned buildout total of approximately 8,302 households, 20,022 residents, and 4,687 jobs in the Planning Area by 2045, consistent with the existing General Plan and land use designations.

Buildout of the Planning Area consistent with the General Plan would result in a net increase in households of 567 households and increase in population of 1,752 residents. It should be noted that current employment exceeds the projected employment for the area by 102 employees. The West Fox Hills community is currently exceeding employment expectations; Alternative 1 would not eliminate jobs from the Planning Area. The Project would result in a buildout total of 14,791 households, 35,726 residents, and 5,297 jobs in the Planning Area by 2045.

Buildout of the Planning Area under proposed Project conditions as compared to Alternative 1 would result in a net increase in housing units by 6,212 units, yielding 65,966¹ households and increase population by 14,318 residents. The Project would result in an increase in employment of 610

¹ Based on the unincorporated Los Angeles County occupancy rate of 96 percent.

employees as compared to Alternative 1. It should be noted that current (2024) employment exceeds the General Plan projected employment for the area by 305 employees.

Implementation of Alternative 1 would result in similar impacts for the majority of issue areas as identified for the Project, with the exception of wildfire. Alternative 1 would result in significant and unavoidable impacts related to wildfire because that issue area is site specific, and regulatory compliance and mitigation measures cannot guarantee the reduction of impacts to a less than significant level. Since the timing, intensity, and location of future development permitted under Alternative 1 is unknown at this time, it is speculative at this time to assume that all future projects would be able to reduce these impacts to a less than significant level under Alternative 1; thus, the potential impacts remain significant and unavoidable. Furthermore, while the significance conclusion would be the same as the Project for energy impacts, Alternative 1 would result in more severe impacts because the energy efficiencies and savings and reduction in VMT would not be provided to the same extent as the Project. Finally, while the significance conclusion for population and housing would be the same as the Project, Alternative 1 would result in less severe impacts, as growth would occur at a slower rate as projected in the General Plan and Communities Plans.

Finding: The County finds that this alternative is unknown at this time, it is speculative at this time to assume that all future projects would be able to reduce the impacts to a less than significant level under Alternative 1; thus, the potential impacts remain significant and unavoidable. Alternative 1 would result in more severe impacts regarding energy efficiencies. Alternative 1 would result in less severe impacts regarding population and housing as growth would occur at a slower rate. However, this alternative substantially reduces the ability to meet all of the project objectives.

Housing Element Residential Units Only

The Housing Element Residential Units Only Alternative (Alternative 2) would modify the WSAP to implement only the residential component of the Housing Element. The Housing Element identifies that the RHNA allocation for the Planning Area is 4,972 units to meet the broader unincorporated Countywide target of 89,232 units. This alternative represents an approximately 26 percent reduction in residential units (which includes 6,757 units) and in households (which includes 6,489 households) as compared to the proposed Project of the WSAP.

The 12 identified Opportunity Sites in the WSAP would be the same as the proposed Project, just at reduced densities than proposed by land use and zoning changes. The goals, policies, and implementation strategies in the WSAP would otherwise remain as currently proposed. As with the proposed Project, land uses within Inglewood Oil Field would be governed by the Baldwin Hills Community Standards District (BHCSA) and any future changes would be conducted under a separate planning process under this alternative.

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

Implementation of Alternative 2 would result in similar impacts for all the issues as identified for the Project. Alternative 2 would not eliminate any of the Project's significant and unavoidable impacts associated with air quality, noise, or transportation to a less than significant level, but would reduce the severity of these impacts due to the reduction in residential units. Additionally, while the significance conclusions would be the same as the proposed Project, Alternative 2 would reduce the impacts associated with cultural resources, energy, GHG emissions, population and housing, public services, recreation, and utilities and service systems. Alternative 2 would result in similar impacts to all other issue areas as the proposed Project.

Finding: The County finds that this alternative would not eliminate potentially significant and unavoidable impacts related to air quality, noise, or transportation. In addition, Alternative 2 would reduce impacts related to cultural resources, energy, GHG emissions, population and housing, public services, recreation, and utilities and service systems compared to the proposed Project. All other impacts would be similar to the proposed Project. Other considerations include meeting project objectives but on a reduced scale compared to the proposed Project due to fewer housing choices.

No Commercial Rezone or Land Use Changes

The No Commercial Rezone or Land Use Changes Alternative (Alternative 3) would implement only the residential component of the proposed WSAP, which includes 6,757 residential dwelling unit, yielding 6,489 households, and would eliminate the 244,000 square feet of non-residential uses that are currently included in the WSAP.

By limiting development within the Planning Area to only the residential component, it would be reasonable to assume that all the impacts related to the proposed Project's commercial component would be avoided. The 12 identified Opportunity Sites included in the WSAP would be the same as the proposed Project. Additionally, Inglewood Oil Field would be identified as an Opportunity Site; however, as with the proposed Project, land uses would be governed by the BHCSO, and any future changes would be conducted under a separate planning process. Alternative 3 would achieve the proposed Project's objectives as they relate to housing opportunities but would fail to meet objectives as they relate to mixed-use development, local economic growth, and prosperity of businesses due to the elimination of the commercial component. Alternative 3 was included for further analysis as an approach to exceeding the County's RHNA allocation for the Planning Area with the goal of decreasing the Project's environmental impacts.

Implementation of Alternative 3 would result in similar impacts for all the issues as identified for the Project. Alternative 3 would not reduce any of the Project's significant and unavoidable impacts associated with air quality, noise, or transportation to a less than significant level, but would reduce the severity of these impacts due to the elimination of 244,000 square feet of nonresidential development. Additionally, while the significance conclusions would be the same as the proposed Project, Alternative 3 would reduce the impacts associated with air quality, cultural resources, energy, GHG emissions, population and housing, public services, recreation, and utilities and service systems. The WSAP would be adopted under Alternative 3; the goals, policies, and development features of the WSAP would be widely applied throughout the Planning Area. However, this alternative would not meet the proposed Project's objectives related to mixed-use and economic vitality. Alternative 3 would result in similar impacts to all other issue areas as the proposed Project.

Finding: The County finds that this alternative would not reduce any of the significant and unavoidable impacts associated with air quality, noise, or transportation. The significance conclusions under Alternative 3 would remain the same, however, it would reduce the impacts associated with air quality, cultural resources, energy, GHG emissions, population and housing, public services, recreation, and utilities and service systems. Alternative 3 would not meet the proposed Project’s objectives related to mixed-use and economic vitality.

Environmentally Superior Alternative

The Project and Project Alternatives are considered and evaluated within this Draft PEIR. Only Alternative 1 would be able to reduce significant and unavoidable Project impacts while Alternative 2 and 3 would still result in the same significant and unavoidable impacts as the proposed Project. However, Alternative 1 would result in two new significant and unavoidable impacts compared to the proposed Project.

None of the Project Alternatives would be able to fully achieve the Project’s objectives. Alternatives 2 and 3 would provide most of the Project’s benefits but would limit the benefits due to a reduced scope of development.

CEQA requires a lead agency to identify the “environmentally superior alternative” and, in cases where the “No Project” Alternative is environmentally superior to the proposed Project, the environmentally superior development alternative must be identified. One alternative has been identified as “environmentally superior” to the proposed Project:

- Housing Element Residential Units Only (Alternative 2)

As shown in tables above, Alternative 1 would reduce the Project’s significant and unavoidable impacts related to air quality and noise but would result in new significant and unavoidable impacts related to wildfire and would increase significant and unavoidable impacts related to transportation. Therefore, this alternative is not the environmentally superior alternative.

Alternative 2 and 3 would result in similar impacts and would partially achieve the Project’s objectives. However, since the scope of development would be greater under Alternative 3 and would implement the WSAP, this alternative would provide greater benefits to the Planning Area as the goals and policies of the WSAP would be applied. While Alternative 2 would not reduce any of the Project’s significant and unavoidable impacts, this alternative would reduce the severity of those impacts, as well as impacts related to cultural resources, energy, GHG emissions, hazards and hazardous materials, hydrology and water quality, population and housing, public services, recreation, and utilities and service systems. However, Alternative 2 would increase impacts related to aesthetics. Additionally, Alternative 2 would not implement all the goals and policies of the WSAP.

While Alternative 2 would reduce the severity of Project impacts, this alternative would not fully achieve the Project’s objectives nor provide the benefits of the Project. For purposes of this Draft PEIR, Alternative 2 is considered the environmentally superior alternative for CEQA purposes because it would result further reduce Project impacts which were found significant and unavoidable or less than significant under the proposed Project.

V. STATEMENT OF OVERRIDING CONSIDERATIONS

Pursuant to PRC Section 21081(b) and State CEQA Guidelines section 15093(a) and (b), the County is required to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. The lead or responsible agency may then approve the project and adopt a “Statement of Overriding Considerations,” which states in writing the specific reasons to support the lead or responsible agency’s action based on the Final EIR and other information in the record (CEQA Guidelines section 15093 and 15096(h)). These Statement of Overriding Considerations are based on substantial evidence in the record, including but not limited to the Final EIR, public testimony, and all other materials that constitute the record of proceedings.

The County finds and determines that (1) all significant environmental effects of the proposed Project have been substantially lessened where feasible; (2) the proposed Project will result in certain significant adverse environmental effects that cannot be avoided or reduced to a less-than-significant level even with incorporation of all feasible mitigation measures; and (3) there are no other feasible mitigation measures or feasible Project alternatives that will further mitigate, avoid, or reduce the remaining significant environmental effects to a less-than-significant level.

The County finds that the adoption and implementation of the Westside Area Plan will have the following economic, social, legal, and other considerable benefits:

1. The proposed Project would preserve community character by focusing new housing and commercial development within existing commercial corridors and centers and in proximity to transit, while allowing changes in existing residential neighborhoods consistent with State legislation.
2. The proposed Project would provide greater housing choices for residents, consistent with the Housing Element.
3. The proposed Project would foster economic health and prosperity of local businesses by promoting a mix of uses and adaptability of buildings in response to the evolving commercial marketplace, nurturing small businesses, and attracting job opportunities and commercial services that serve local residents.
4. The proposed Project would encourage the development of businesses that serve and are accessible to their neighborhoods and reflect the history and culture of the Westside Planning Area
5. The proposed Project would transform today’s automobile dominant land use pattern and densities and improve streetscapes to promote a more active pedestrian environment.
6. The proposed Project would promote the inclusion of publicly accessible plazas and courtyards in new commercial and mixed-use development projects where residents can gather, participate in events, and celebrate the history and culture of the community.
7. The proposed Project would protect open spaces and natural resources while emphasizing sustainable building practices and implementing infrastructure improvements that are

environmentally sensitive and minimize impacts on energy, water, air, and climate.

8. The proposed Project would provide diversity of travel choices by enabling residents to efficiently and safely access destinations throughout the community by walking, biking, using public transit, and emerging forms of transportation.

After balancing the specific economic, social, legal, and other considerable benefits of the proposed Project, the County finds that the remaining significant and unavoidable environmental effects are acceptable due to the factors described in the Statement of Overriding Considerations above.