LA COUNTY PLANNING

AMY J. BODEK, AICP
Director,
Regional Planning

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Chief Deputy Director,
Regional Planning

REPORT TO THE REGIONAL PLANNING COMMISSION

DATE ISSUED:	April 16, 2026
HEARING DATE:	April 29, 2026 AGENDA ITEM: 12
PROJECT NUMBER:	PRJ2023-002770-(2)
PERMIT NUMBER(S):	Specific Plan Amendment No. RPPL2023004093 Development Agreement No. RPPL2023005669 Conditional Use Permit No. RPPL2023004092 Administrative Housing Permit No. RPPL2023004095 Environmental Plan No. RPPL2023004097
SUPERVISORIAL DISTRICT:	2
PROJECT LOCATION:	1667 E. 118th Street, Willowbrook, CA 90059
OWNER:	Compton Unified School District & LA County Development Authority
APPLICANT:	CDU/MLK Wellness Collaborative, LLC
PUBLIC MEETINGS HELD:	1 of 5
INCLUSIONARY ZONING ORDINANCE (IZO):	The Project is not subject to the IZO because it is located within a submarket area that does not require inclusionary housing.
CASE PLANNER:	Bryan S. Moller, Senior Regional Planner bmoller@planning.lacounty.gov

RECOMMENDATION

The following recommendation is made prior to the public hearing and is subject to change based upon testimony and/or documentary evidence presented at the public hearing:

LA County Planning staff ("Staff") recommends that the Regional Planning Commission **ADOPT THE RESOLUTIONS RECOMMENDING THAT THE BOARD OF SUPERVISORS ADOPT** Specific Plan Amendment ("PA") No. RPPL2023004093, Development Agreement ("DA") No. RPPL2023005669, **AND APPROVE** Conditional Use Permit Number ("CUP") No. RPPL2023004092, Administrative Housing Permit ("HP") No. RPPL2023004095, and Environmental Plan No. RPPL2023004097, based on the Findings (Exhibit C – Findings) contained within this report and subject to the Draft Conditions of Approval (Exhibit D – Conditions of Approval).

Staff recommends the following motions:

CEQA:

I MOVE THAT THE REGIONAL PLANNING COMMISSION CLOSE THE PUBLIC HEARING, AND, HAVING CONSIDERED THE ADDENDUM ALONG WITH THE FINAL ENVIRONMENTAL IMPACT REPORT FOR THE WILLOWBROOK TRANSIT-ORIENTED DISTRICT SPECIFIC PLAN (ENVIRONMENTAL ASSESSMENT NO. 201500136), HEREBY APPROVE THE ADDENDUM TO THE CERTIFIED FINAL ENVIRONMENTAL IMPACT REPORT (ENVIRONMENTAL PLAN NO. RPPL2023004097) AND THE RELATED MITIGATION MONITORING AND REPORTING PROGRAM FOR THE PROJECT.

ENTITLEMENTS:

I MOVE THAT THE REGIONAL PLANNING COMMISSION ADOPT THE RESOLUTIONS RECOMMENDING THAT THE BOARD OF SUPERVISORS APPROVE SPECIFIC PLAN AMENDMENT NO. RPPL2023004093 AND DEVELOPMENT AGREEMENT NO. RPPL2023005669, AS WELL AS CONDITIONAL USE PERMIT NO. RPPL2023004092 AND ADMINISTATIVE HOUSING PERMIT NO. RPPL2023004095 SUBJECT TO THE ATTACHED FINDINGS AND CONDITIONS.

PROJECT DESCRIPTION

A. Entitlements Requested

- PA to update the Principal Use Regulations and Development Standards of the Willowbrook Transit-Oriented District Specific Plan ("Specific Plan") Mixed Use 1 ("MU-1") and Mixed Use 2 ("MU-2") Zones pursuant to County Code Section 22.180.020 ([Plan Amendments] Applicability).
- DA to provide certainty to the permittee for developing the various components of the proposed project over a set time period in exchange for community benefits pursuant to County Code Section 22.162.020 ([Development Agreements] Applicability).
- CUP to authorize various university uses (including offices, parking facilities, recreational facilities, and on-campus faculty/staff/student housing) in the Specific Plan MU-2 Zone pursuant to County Code Chapter 22.412 (Willowbrook Transit-Oriented District Specific Plan) Section 3.5 (Mixed Use Zones).
- HP to authorize and track the affordable housing uses and incentives pursuant to State Density Bonus Law and County Code Section 22.166.040 (Administrative Housing Permit).
- Environmental Plan for the California Environmental Quality Act ("CEQA") Addendum to the previously certified Final Environmental Impact Report ("FEIR") for the Specific Plan concluding that the proposed project would not result in any increased or

additional environmental impacts beyond those which were analyzed in the FEIR and therefore concluding that supplement environmental analysis is not required.

B. Related Entitlements

- Ministerial Site Plan Review to authorize the construction of five multi-family residential buildings in the Specific Plan MU-2 Zone pursuant to County Code Chapter 22.412 (Willowbrook Transit-Oriented District Specific Plan) Section 3.5 (Mixed Use Zones).

C. Project

The applicant, CDU/MLK Wellness Collaborative, LLC ("Permittee"), is proposing a campus master plan that includes an expansion of Charles Drew University ("CDU") consisting of university offices, university athletics facilities, student and faculty/staff housing, a street vacation, and non-university related affordable housing ("Proposed Project"). The Proposed Project is located on a vacant 12.83-acre site at 1667 E. 118th Street, Willowbrook, CA 90059 within the Willowbrook-Enterprise Zoned District, which consists of Assessor Parcel Numbers ("APNs") 6149-014-900, 6149-012-902, 6149-014-903, 6149-014-904, and 6149-014-906 ("Project Site").The Project Site is accessible from Compton Ave., E. 117th St., E. 117th Pl., and E. 118th St.

To facilitate the development of the Proposed Project, the Permittee is proposing to create 13 ground lease areas across the Project Site. Eight of these ground leases are for the university portion of the Proposed Project, and five of these ground leases are for the non-university related affordable housing. The Proposed Project components are described in detail below.

CDU Expansion (University Use)

The Proposed Project is intended to enhance the CDU campus with new and expanded academic, recreational, and residential facilities to cater to existing students, staff, and faculty. The new university facilities are also intended to make the university more attractive to an even more diverse pool of potential students, staff, and faculty.

The CDU expansion is located on APNs 6149-014-900, 6149-014-903, 6149-014-904, and 6149-014-906 and consists of:

Parking Structure (Building U8)

A 9-story, 108-foot-and-7-inch-tall, parking structure with 637 vehicle parking spaces and 11,500 square feet of university office and storage space.

University Office Building (Building U7)
A 5-story, 73-foot-tall, 121,000-square-foot university office building for general office, research, and clinical uses as well as a 5,000-square-foot community space for use by local groups and non-profits and 84 vehicle parking spaces.

Athletics Facilities Building (Building U6)
A 2-story, 34-foot-tall, 43,100-square-foot athletics facilities building with a swimming pool, a basketball court, exercise rooms, a running/walking path, and support facilities.

Athletics Field (Facility U5)
A 100-yard by 60-yard field to support soccer and other sports infrastructure.

Faculty and Staff Housing (Building U4)
A 5-story, 58-foot-and-9-inch-tall, 55-unit building that will provide housing for CDU faculty and staff.

Student Housing (Building U3)
A 5-story, 66-foot-and-9-inch-tall, 108-unit student housing building with a 10,270-square-foot commercial component intended for university-oriented retail.

Student Housing (Building U2)
A 5-story, 58-foot-and-9-inch-tall, 70-unit student housing building.

Student Housing (Building U1)
A 5-story, 58-foot-and-9-inch tall, 72-unit student housing building.

Pedestrian Promenade (E. 118th St.)
A street vacation of E. 118th St. will create an approximately 700 linear foot pedestrian promenade with landscaping and decorative paving, connecting the Project Site with the existing CDU campus and creating an inviting space for both campus and public use.

Affordable Housing (Non-University Use)
The affordable housing component is located on APN 6149-012-902 and consists of:

Affordable Senior Housing (Building A5)
A 4-story, 53-foot-and-9-inch tall, up to 54-unit, 100% affordable senior apartment building (lower-income, up to 80% Area Median Income ("AMI")) with 27 vehicle parking spaces at ground level.

Affordable Housing (Building A4)
A 4-story, 53-foot-and-9-inch, up to 53-unit, 100% affordable apartment building (lower-income, up to 80% AMI) with 29 vehicle parking spaces at ground level.

Affordable Housing (Building A3)
A 4-story, 53-foot-and-9-inch, up to 53-unit, 100% affordable apartment building (lower-income, up to 80% AMI) with 29 vehicle parking spaces at ground level.

Affordable Housing (Building A2)
A 4-story, 53-foot-and-9-inch, up to 47-unit, 100% affordable apartment building (lower-income, up to 80% AMI) with 24 vehicle parking spaces at ground level.

Affordable Housing (Building A1)
A 4-story, 53-foot-and-9-inch, up to 47-unit, 100% affordable apartment building (lower-income, up to 80% AMI) with 24 vehicle parking spaces at ground level.

Due to the myriad project components and the resulting complexity, the Permittee is requesting a PA and a DA. The County is also incorporating its own Specific Plan amendments to align Specific Plan provisions with other County Land Use and Planning documents. The proposed amendments are as follows:

Project Requested Amendments:
1. Adding senior citizen housing as an allowed land use.
2. Adding student and staff housing as an allowed land use.
3. Increasing the building height maximum in the MU-2 Zone from 50 feet to 73 feet and allowing 110 feet for parking structures.
4. Allowing increased common open space to replace the private open space requirement for student housing.
5. Allowing off-site parking for student/staff housing without a Parking Permit.

County Requested Amendments:
1. Removing the building stories limits.
2. Removing dwelling unit floor area minimums.
3. Updating the Wireless Telecommunications Facilities land use reference to reflect current policy.

After deeming the application complete in 2023, the County amended the Specific Plan as a part of the Metro Area Plan effort. In order to ensure that both the version of the Specific Plan in effect at the time the application was deemed complete and the current version are

kept in sync, the County proposes that both versions of the Specific Plan be amended concurrently.

The DA is requested to provide the Permittee with certainty in developing the various components of the Proposed Project over a set time period. The DA is also requested to facilitate a harmonious development vision across the Project Site including both the CDU portion and the affordable housing portion. Development Agreements can be entered into with any person having a legal or equitable interest in the development of real property if the Findings and Conditions can be met. As part of the Proposed Project, the DA ensures the development of the affordable units with a 99-year affordability covenant and that the affordable dwelling units and university expansion are developed in a coordinated and timely fashion.

Key Components of the DA include:

1. Term Length
    - A 30-year term is established for the DA, ensuring timely development of the Proposed Project without an open-ended approval.
2. Development Schedule
    - The schedule provides a timeline of construction for both the university expansion and non-university affordable housing buildings, ensuring that at least 55% of the university expansion is built within 20 years and that all proposed affordable housing is built within 15 years.
3. Design Review
    - Requires that the final building designs be reviewed by Staff, ensuring that architectural components take the surrounding neighborhood into consideration and create a cohesive urban form.
4. Community Benefits
    - Various community benefits from the Proposed Project are codified, including but not limited to:
        - No-cost programming and events;
        - A minimum of 220 and up to 249 affordable housing units at 80% AMI;
        - A minimum of 70 and up to 305 units of university housing for faculty, staff, and students;
        - Public access to on-campus open space and walking paths during daylight hours;
        - Public access to athletics field and facilities during evening hours and weekends;

- Access to meeting spaces within buildings, for local community organizations and stakeholders, during business hours; and
- Local worker hiring programs.

The DA will be reviewed annually by Staff to ensure compliance as required by Title 22.

D. Project Background

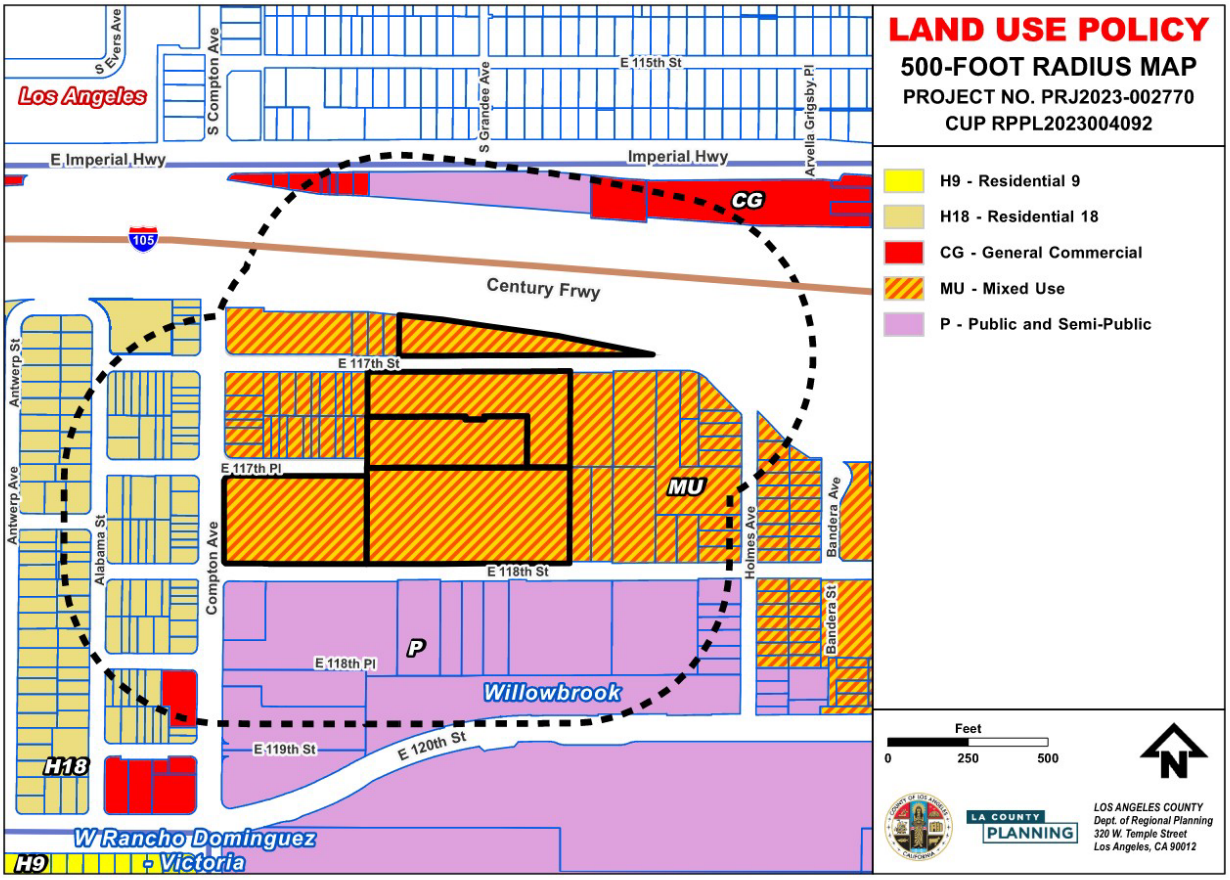
The Project Site, not including the northernmost parcel north of E. 117th St., formerly housed two Compton Unified School District public schools. By 2018, one school was relocated and the other was closed, leaving the site abandoned with over a dozen school buildings and associated school improvements. Due to vandalism, all above ground structures were demolished by 2023 and since then portions of the property have remained vacant with portions of it used as surface parking.

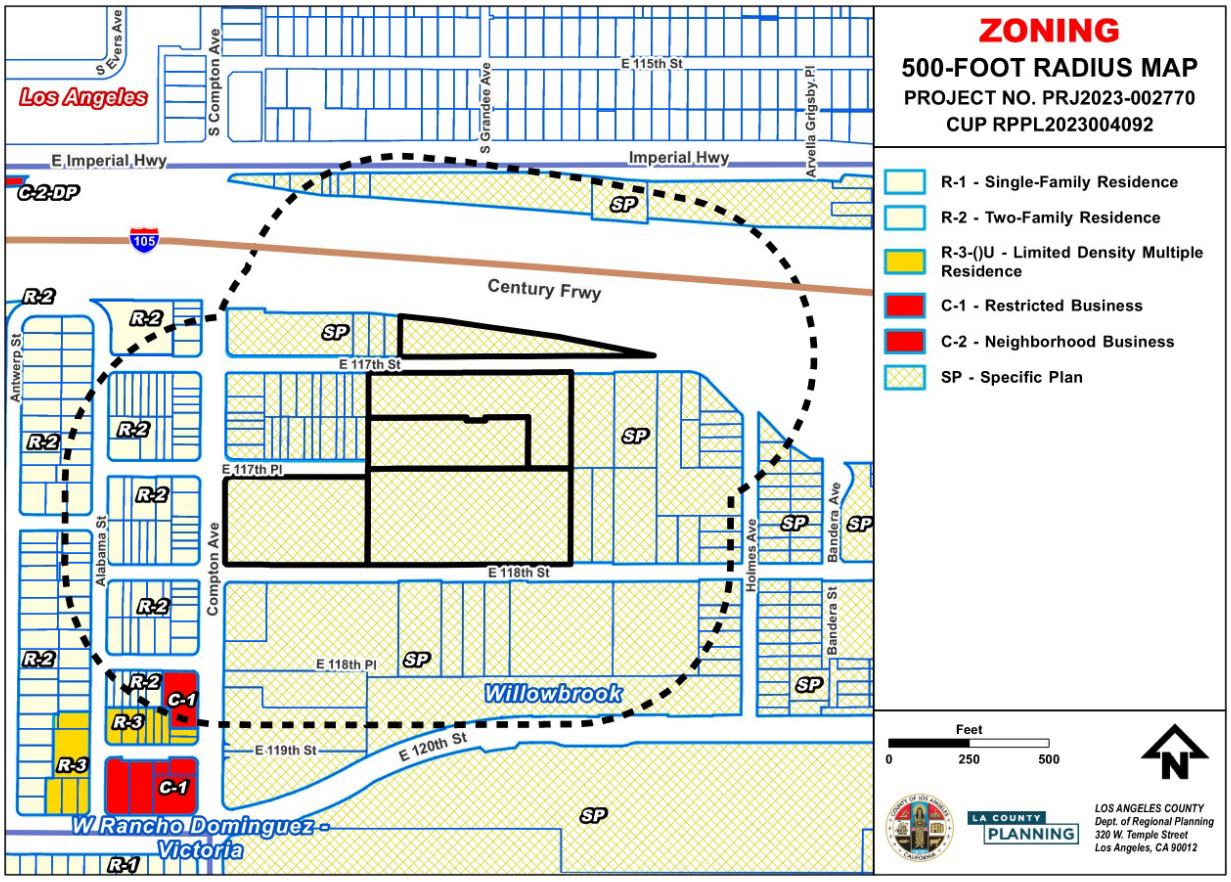
SUBJECT PROPERTY AND SURROUNDINGS

The following chart provides property data within a 500-foot radius:

LOCATION	GENERAL PLAN LAND USE POLICY	ZONING	EXISTING USES
SUBJECT PROPERTY	Mixed Use ("MU")	Specific Plan MU-2	Vacant
NORTH	MU	Specific Plan MU-2	Single-family residences, multi-family residences and Interstate 105
EAST	MU	Specific Plan MU-2 and Specific Plan MU-1	Single-family residences, multi-family residences, university uses, and commercial uses
SOUTH	Public and Semi Public ("P")	Specific Plan Drew Educational	Multi-family residences, educational facilities including Charles Drew University, and Martin Luther King Jr. Hospital

WEST	MU, Residential 18 (“H18”)	Specific Plan MU-2 and Two-Family Residence (“R-2”)	Single-family and multi-family residences





PROPERTY HISTORY

A. Zoning History

ORDINANCE NO.	ZONING	DATE OF ADOPTION
2018-0033z	SP	9/18/2018
990060z	C-2	7/6/1999
5124	R-2	5/25/1948
3264	Single Family Residence (“R-1”), R-2, and Light Agricultural (“A-1”)	12/20/1938

B. Previous Cases

CASE NO.	REQUEST	DATE OF ACTION
Zone Exception Case 2828	School with associated fencing within an R-2 zone.	4/19/1957

C. Violations

There are no zoning violations on record for the Project Site.

ANALYSIS

A. Land Use Compatibility

The neighborhood surrounding the Proposed Project Site consists of:

- Interstate 105, single-family, and multi-family residences to the north.
- University, commercial, single-family, and multi-family residences to the east.
- University, educational (including Charles Drew University and King Drew Magnet High School), multi-family, and medical (Martin Luther King Jr. Hospital) uses to the south.
- Single-family and multi-family residences to the west.

The Proposed Project includes university uses and affordable multi-family housing on vacant land. As the proposed uses are an expansion of an existing university and the addition of new multi-family residences into a community already containing both, the Proposed Project is compatible with existing surrounding uses. Furthermore, the Proposed Project includes multi-family residences that are anticipated to operate similarly to other existing residences in the vicinity. As it pertains to the layout of the proposed buildings, the Proposed Project locates the largest structure, the parking garage, on the northern edge of the Project Site adjacent to Interstate 105 and away from the majority of the existing residences. As such, most vehicle trips and vehicular activity to the Project Site will be isolated from the existing residential neighborhoods. Furthermore, the proposed university uses will be located in the center of the Project Site adjacent to existing university buildings to allow for seamless integration with the existing campus. Lastly, the proposed affordable multi-family housing is located on the westernmost portion of the Project Site along Compton Ave. and adjacent to and situated in the middle of an existing pattern of multi-family residences. Therefore, the Proposed Project is compatible with the existing land uses in the surrounding community.

B. Neighborhood Impact (Need/Convenience Assessment)

The Proposed Project will bring the following five major benefits to the existing neighborhood and the surrounding community:

1. Housing
   Up to 249 units of affordable housing will be added to the existing housing stock, providing expanded housing options below market-rate, without displacing any existing residents and potentially easing overcrowding conditions that may exist in the neighborhood. Additionally, by providing up to 305 units of student and faculty/staff housing, the university seeks to alleviate its potential housing impacts on the neighborhood while providing increased housing options for those affiliated with the university.
2. Neighborhood Connectivity
   The Proposed Project will leave the campus open without gates resulting in a campus that integrates itself into the existing surrounding urban fabric. Additionally, the proposed street vacation along 118th St. and the resulting pedestrian promenade will provide a car-free safe connection for the neighborhood and stitch together two blocks of the neighborhood.
3. Community Access
   The Proposed Project includes privately maintained, publicly accessible facilities as part the development. The campus open space and walking paths will be open to the public during daylight hours. The athletics field and facilities will typically be available for public use outside of school hours (6:00PM – 11:00PM) and during weekends. Additionally, the Proposed Project includes meeting spaces for local community organizations and stakeholders to use for gatherings during normal business hours (6:00AM – 11:00PM).
4. Parking
   The 637-space parking garage would provide ample opportunity for faculty, staff, and students to park on campus, preventing on-street parking competition resulting from project buildout and leaving existing street parking options unimpacted.

As discussed, the existing neighborhood is characterized by the same uses that the Proposed Project includes, namely multi-family residences and university uses. The key difference between the Proposed Project and the surrounding area is that the Proposed Project includes buildings that are generally taller (ranging from one to five stories in height except for the nine-story garage) than those in the immediate area (one to four stories). However, extending out from the immediate surroundings, there are five and six-story buildings of similar height to those of the Proposed Project. Regarding the proposed nine-story garage, while it is taller than nearby buildings, it abuts the elevated Interstate 105 freeway right-of-way and is similar in height to that existing piece of transportation

infrastructure (approximately 110 feet in height); the proposed location of the garage acts as a buffer between the neighborhood and the noise and pollution generated by the use of Interstate 105.

C. Design Compatibility

As a campus master plan, the architectural design for the Proposed Project's individual buildings and components is not finalized. As each project building/component is implemented, the Permittee will submit a revision to the approved set of plans with the specific architectural design. While each component is required to comply with the requirements and development standards of the Specific Plan, the DA also requires that each building be submitted to Staff for review to ensure compliance with good urban design principles. To ensure that both Staff and the Permittee's team have certainty as to the architectural goals sought, the DA includes the following principles:

- Equally considering all sides of a building through the use of high quality materials, massing, articulation, and scale recognizing and respecting existing and proposed surrounding context;
- Orienting primary building entrances toward surrounding streets to engage the existing surrounding community;
- Incorporating landscaping features to soften the edge between buildings and surrounding pathways, sidewalks, and other public/private walkways; and
- Designing all buildings in a manner that makes it easy for users to walk and bike to and from buildings and to destinations inside and outside of the Proposed Project boundaries.

The submitted conceptual plans lay the groundwork for the subsequent Staff review of the final design of each building/component of the Proposed Project. The site design/building arrangement incorporates many of these principles, including buildings near lot lines, minimized pedestrian-driveway interactions through locating driveways on-site, and landscaped/open space areas throughout the Project Site and at the edges near the existing neighborhoods.

As discussed in both the Land Use Compatibility and Neighborhood Impact sections above, the Proposed Project reflects the existing character of the neighborhood, and the goal is to bring forth well-designed buildings that are cohesive not only with other proposed buildings/components but also with the existing development pattern and building fabric. The existing neighborhood does not have a uniform design palate but is characterized by residential buildings that are one and two-stories tall, one recently completed four-story modern multi-family apartment building at the corner of Compton Ave. and E. 117th St., and several five- and six-story multi-family apartment buildings on Wilmington Ave. and

118th St. While the overall Proposed Project's building massing is taller than most of the existing neighborhood, the proposed buildings are mostly separated from existing surrounding buildings by public streets (creating a larger setback) and are arranged toward the south side of the Project Site near the existing university campus. Furthermore, compliance with the required setbacks, in addition to public right-of-way separation, will reduce impacts to the existing character of the neighborhood. The Proposed Project will continue the evolving building design of the neighborhood while also being sensitive to that existing fabric.

GENERAL PLAN/COMMUNITY PLAN CONSISTENCY

The Proposed Project is consistent with applicable goals and policies of the General Plan and the Specific Plan. Consistency findings can be found in the attached Findings (Exhibit C – Findings). Furthermore, although not subject to the Metro Area Plan because the application was deemed complete before its adoption, the Proposed Project is consistent with its goals and policies as well.

ZONING ORDINANCE CONSISTENCY

The Proposed Project complies with all applicable zoning requirements. The Proposed Project is not subject to the IZO because it is located within a submarket area that does not require inclusionary housing. Consistency findings can be found in the attached Findings (Exhibit C – Findings).

BURDEN OF PROOF

The Permittee is required to substantiate all facts identified by County Code Sections 22.180.040 ([Plan Amendments] Findings and Decision), 22.162.040 ([Development Agreements] Findings and Decision) and 22.158.050 ([Conditional Use Permits] Findings and Decision). The Burden of Proof with Permittee's responses is attached (Exhibit E – Permittee's Burden of Proof). Staff is of the opinion that the Permittee has met the burden of proof.

ENVIRONMENTAL ANALYSIS

An Addendum to the certified EIR for the Specific Plan was prepared in compliance with CEQA and the County environmental guidelines to account for the Proposed Project. The Addendum concluded that the Proposed Project would not result in any increased or additional environmental impacts beyond those which were analyzed in the EIR and therefore concluded that supplement environmental analysis was not required. A copy of the Addendum is attached (Exhibit F – Environmental Determination).

COMMENTS RECEIVED

A. County Department Comments and Recommendations

1. The Department of Public Works, in a letter dated January 15, 2026, recommended that the Proposed Project proceed to public hearing with required conditions of approval.
2. The Fire Department, in a letter dated December 17, 2025, recommended that the Proposed Project proceed to public hearing with required conditions of approval.

B. Other Agency Comments and Recommendations

1. Staff has not received any comments at the time of report preparation.

C. Public Comments

1. Staff has not received any comments at the time of report preparation.

Report Reviewed By: _____
Kevin Finkel, AICP, Acting Assistant Deputy Director

Report Approved By: _____
Mitch Glaser, AICP, Assistant Deputy Director

LIST OF ATTACHED EXHIBITS	
EXHIBIT A	Plans
EXHIBIT B	Project Summary Sheet
EXHIBIT C	Findings
EXHIBIT D	Conditions of Approval
EXHIBIT E	Permittee's Burdens of Proof
EXHIBIT F	Environmental Determination including EIR Addendum
EXHIBIT G	Informational Maps
EXHIBIT H	Draft Willowbrook TOD Specific Plan Amendments
EXHIBIT I	Draft Development Agreement
EXHIBIT J	Draft Resolutions
EXHIBIT K	Agency Correspondence

CMWC, LLC

Wellness & Education Campus Plan & Land Use

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GENERAL NOTES

3. Community Protection Branch: Environmental Hygiene

Please Note: The following are general requirements for Noise and Air Quality recommendations for the proposed project.

3.1 Noise

3.1.1 The applicant shall abide by the requirements contained in Title 12, Section 12.08, Noise Control Ordinance for the County of Los Angeles (reference available at municode.com). The sections in Title 12 that apply to this project include but are not limited to: 12.08.390 Exterior Noise Standards, 12.08.440 Construction Noise, and 12.08.530 Residential Air-Conditioning.

3.1.2 The proposed project is in close proximity to commercial buildings, and based on the scope of the project, it is anticipated that construction noise will impact the surrounding community.

3.1.2.1 Noise mitigation measures should be applied to the project site to reduce significant impacts related to construction noise and vibration and to comply with Los Angeles County Code Title 12, 12.08.440 – Construction Noise. Applicable noise mitigation strategies may include but are not limited to, the following:

1. Construction shall occur between 7:00 am and 7:00 pm Monday through Saturday. Construction is not allowed on Sundays or federal holidays.
2. All construction equipment shall be equipped with the manufacturers' recommended noise muffling devices, such as mufflers and engine covers. These devices shall be kept in good working condition throughout the construction process.
3. Installation of a temporary sound barrier at the property lines of the proposed project site to mitigate noise impacts on all surrounding residential properties.
4. All construction equipment shall be properly maintained and tuned to minimize noise emissions.
5. Stationary noise sources (e.g., generators and compressors) shall be located as far from residential receptor locations as is feasible.

3.1.3 Construction Noise 12.08.440

Operating or causing the operation of any tools or equipment used in construction, drilling, repair, alteration, or demolition work between weekday hours of 7:00 p.m. and 7:00 a.m., or at any time on Sundays or holidays, such that the sound therefrom creates a noise disturbance across a residential or commercial real-property line, except for emergency work of public service utilities or by variance issued by the health officer is prohibited.

A. Mobile Equipment. Maximum noise levels for nonscheduled, intermittent, short-term operation (less than 10 days) of mobile equipment:

	Single-family Residential	Multi-family Residential	Semi residential/ Commercial
Daily, except Sundays and legal holidays, 7:00 a.m. to 8:00 p.m.	75 dBA	80 dBA	85 dBA
Daily, 8:00 p.m. to 7:00 a.m. and all-day Sunday and legal holidays	60 dBA	64 dBA	70 dBA

B. Stationary Equipment. Maximum noise level for repetitively scheduled and relatively long-term operation (periods of 10 days or more) of stationary equipment:

	Single-family Residential	Multi-family Residential	Semi residential/ Commercial
Daily, except Sundays and legal holidays, 7:00 a.m. to 8:00 p.m.	60 dBA	65 dBA	70 dBA
Daily, 8:00 p.m. to 7:00 a.m. and all day Sunday and legal holidays	50 dBA	55 dBA	60 dBA

3.2 Air Quality Recommendation

3.2.1 During grading or excavation activities if applicable, application of dust control measures to minimize fugitive dust is recommended. Fugitive dust can result in worker and public exposure to fungal spores such as Coccidioides immitis, which can cause Coccidioidomycosis (Valley Fever). Adhere to applicable air quality Air Quality Management District regulations.

For questions regarding Environmental Hygiene, please contact, Makkaphoeum Em, Environmental Hygiene Program at (626) 430-5201 or mem@ph.lacounty.gov.

If you have any other questions or require additional information, please contact Veronica Aranda Public Health, Land Use Program at (626) 430-5201 or varanda@ph.lacounty.gov.



SITE SUMMARY

NORTH OF 117th STREET:
LOT AREA: 56,614 SQUARE FEET / 1.3 ACRES
BUILDING AREA: 11,500 SQUARE FEET
LOT COVERAGE: 59.3%
FLOOR AREA RATIO: 0.203 / MAX. 3:1

SOUTH OF 117th STREET:
LOT AREA: 502,346 SQUARE FEET / 11.52 ACRES
BUILDING AREA: 798,700 SQUARE FEET
LOT COVERAGE: 39.5%
FLOOR AREA RATIO: 1.589 / MAX. 3:1
RESIDENTIAL UNITS: 559
DENSITY: AFFORDABLE BLDGS. A1-A5 (3.25 ACRES)
60 DWELLING UNITS / ACRE ALLOWED
78.15 DWELLING UNITS / ACRES PROVIDED WITH DENSITY BONUS (254 UNITS)

UNIVERSITY HOUSING: BLDG. U1-U4 (8.28 ACRES)
60 DWELLING UNITS / ACRE ALLOWED
36.83 DWELLING UNITS / ACRES PROVIDED (305 UNITS)

SITE LANDSCAPING:
LOT AREA: 558,960 SQAURE FEET / 12.83 ACRES x 10% = 55,896 SQUARE FEET / 1.28 ACRES REQUIRED

OPEN SPACE:

NON-RESIDENTIAL COMMON OPEN SPACE:
1,000 SF / ACRE =
6.52 ACRES x 1,000 = 6,520 SF REQUIRED
(REF. SHEET L0-06 FOR ADDITIONAL INFORMATION)
AFFORDABLE & SENIOR HOUSING PRIVATE OPEN SPACE:
50 SF / DWELLING UNIT =
254 DWELLING UNITS x 50 SF = 12,700 SF REQUIRED
(REF. SHEET L0-06 FOR ADDITIONAL INFORMATION)
AFFORDABLE & SENIOR HOUSING COMMON OPEN SPACE:
25 SF / DWELLING UNIT =
254 DWELLING UNITS x 50 SF = 6,350 SF REQUIRED
(REF. SHEET L0-06 FOR ADDITIONAL INFORMATION)
TOTAL COMMON OPEN SPACE:
REF. SHEET L0-06 FOR ADDITIONAL INFORMATION
TOTAL SITE LANDSCAPING:
REF. SHEET L0-06 FOR ADDITIONAL INFORMATION
STUDENT & FACULTY HOUSING COMMON & PRIVATE OPEN SPACE:
REF. SHEET L0-06 FOR ADDITIONAL INFORMATION

PLAN CHECK SUBMITTAL WILL INCLUDE BUILDING CONSTRUCTION TYPE, FIRE SPRINKLER SYSTEM TYPE AND FIRE FLOW DATA AND THAT ALL DRAWINGS WILL COMPLY WITH THE REFERENCED CBC, CPC AND FIRE CODE. FIRE CODE 507.3 & APPENDIX B105.1

FIRE SPRINKLER TO BE NFPA 13D - REF. SPRINKLER SYSTEMS SHALL BE DESIGNED AND INSTALLED IN ACCORDANCE WITH SECTION 903.3.1.1, UNLESS OTHERWISE PERMITTED BY SECTIONS 903.3.1.2 AND 903.3.1.3 AND OTHER CHAPTERS OF THIS CODE, AS APPLICABLE. 903.3.1.3 NFPA 13D SPRINKLER SYSTEMS AUTOMATIC SPRINKLER SYSTEMS INSTALLED IN ONE- AND TWO-FAMILY DWELLINGS; GROUP R-3; GROUP R-4

FLOOR AREA SUMMARY

BUILDINGS A1, A2 - AFFORDABLE HOUSING
BUILDING AREA:
LEVEL 1: 7,500 SQUARE FEET
PARKING: 9,166 SQUARE FEET (ACCESORY PARKING)
LEVELS 2-4: 15,000 SQUARE FEET PER FLOOR (45,000 TOTAL)
TOTAL AREA: 61,666 SQUARE FEET
CONSTRUCTION TYPE: TYPE V-A (45,000 SF) OVER TYPE I (7,500 SF + 9,166 SF)
FIRE FLOW (REQ'D): 2,250 GPM W/ NFPA 13 SPRINKLER SYSTEM (4,500 GPM)
UNITS:
LEVEL 1: 2 UNITS
LEVELS 2-4: 15 UNITS PER FLOOR (45 TOTAL)
TOTAL UNITS: 47
50 SF / UNIT OF PRIVATE OUTDOOR SPACE (2,350 SF TOTAL)
PARKING:
A1 (BLDG.) - 24 SPACES PROVIDED
A2 (BLDG.) - 24 SPACES PROVIDED

BUILDINGS A3, A4 - AFFORDABLE HOUSING
BUILDING AREA:
LEVEL 1: 8,300 SQUARE FEET
PARKING: 11,335 SQUARE FEET (ACCESORY PARKING)
LEVELS 2-4: 16,800 SQUARE FEET PER FLOOR (50,400 TOTAL)
TOTAL AREA: 70,035 SQUARE FEET
CONSTRUCTION TYPE: TYPE V-A (50,400 SF) OVER TYPE I (8,300 SF + 11,335 SF)
FIRE FLOW (REQ'D): 2,375 GPM W/ NFPA 13 SPRINKLER SYSTEM (4,750 GPM)
UNITS:
LEVEL 1: 2 UNITS
LEVELS 2-4: 17 UNITS PER FLOOR (51 TOTAL)
TOTAL UNITS: 53
50 SF / UNIT OF PRIVATE OUTDOOR SPACE (2,650 SF TOTAL)
PARKING:
A3 (BLDG.) - 29 SPACES PROVIDED
A4 (BLDG.) - 29 SPACES PROVIDED

BUILDING A5 - AFFORDABLE SENIOR HOUSING
BUILDING AREA:
LEVEL 1: 3,300 SQUARE FEET
PARKING: 10,510 SQUARE FEET (ACCESORY PARKING)
LEVELS 2-4: 13,600 SQUARE FEET PER FLOOR (40,800 TOTAL)
TOTAL AREA: 54,610 SQUARE FEET
CONSTRUCTION TYPE: TYPE V-A (40,800 SF) OVER TYPE I (3,300 SF + 10,510 SF)
FIRE FLOW (REQ'D): 2,125 GPM W/ NFPA 13 SPRINKLER SYSTEM (4,250 GPM)
UNITS:
LEVEL 1: NO UNITS
LEVELS 2-3: 19 UNITS PER FLOOR (38 TOTAL)
LEVEL 4: 16 UNITS
TOTAL UNITS: 54
50 SF / UNIT OF PRIVATE OUTDOOR SPACE (2,700 SF TOTAL)
PARKING:
A5 (BLDG.) - 27 SPACES PROVIDED

BUILDING U1 - MARKET RATE STUDENT HOUSING
BUILDING AREA (PARKING AREA NOT INCLUDED):
LEVELS 1-5: 14,100 SQUARE FEET (70,500 TOTAL)
TOTAL AREA: 70,500 SQUARE FEET
CONSTRUCTION TYPE: TYPE V-A (70,500 SF)
FIRE FLOW (REQ'D): 2,500 GPM W/ NFPA 13 SPRINKLER SYSTEM (5,000 GPM)
UNITS:
LEVEL 1: 12 UNITS
LEVELS 2-5: 15 UNITS PER FLOOR (60 TOTAL)
TOTAL UNITS: 72
50 SF / UNIT OF PRIVATE OUTDOOR SPACE (3,600 SF TOTAL)

BUILDING U2 - MARKET RATE STUDENT HOUSING
BUILDING AREA (PARKING AREA NOT INCLUDED):
LEVELS 1-5: 13,500 SQUARE FEET (67,500 TOTAL)
TOTAL AREA: 67,500 SQUARE FEET
CONSTRUCTION TYPE: TYPE V-A (67,500 SF)
FIRE FLOW (REQ'D): 2,375 GPM W/ NFPA 13 SPRINKLER SYSTEM (4,750 GPM)
UNITS:
LEVEL 1: 10 UNITS
LEVELS 2-5: 15 UNITS PER FLOOR (60 TOTAL)
TOTAL UNITS: 70
50 SF / UNIT OF PRIVATE OUTDOOR SPACE (3,500 SF TOTAL)

BUILDING U3 - MARKET RATE STUDENT HOUSING
BUILDING AREA (PARKING AREA NOT INCLUDED):
LEVEL 1: 19,100 SQUARE FEET (INCLUDES 10,270 SF OF RETAIL)
LEVELS 2-5: 19,100 SQUARE FEET PER FLOOR (76,400 TOTAL)
TOTAL AREA: 95,500 SQUARE FEET
CONSTRUCTION TYPE: TYPE V-A (76,400 SF) OVER TYPE I (19,100 SF)
FIRE FLOW (REQ'D): 2,500 GPM W/ NFPA 13 SPRINKLER SYSTEM (5,000 GPM)
UNITS:
LEVEL 1: 0 UNITS
LEVELS 2-5: 27 UNITS PER FLOOR (108 TOTAL)
TOTAL UNITS: 108

BUILDING U4 - MARKET RATE FACULTY/STAFF HOUSING
BUILDING AREA (PARKING AREA NOT INCLUDED):
LEVELS 1-5: 10,950 SQUARE FEET (54,750 TOTAL)
TOTAL AREA: 54,750 SQUARE FEET
CONSTRUCTION TYPE: TYPE V-A (54,750 SF)
FIRE FLOW (REQ'D): 2,125 GPM W/ NFPA 13 SPRINKLER SYSTEM (4,250 GPM)
UNITS:
LEVEL 1: 7 UNITS
LEVELS 2-5: 12 UNITS PER FLOOR (48 TOTAL)
TOTAL UNITS: 55
50 SF / UNIT OF PRIVATE OUTDOOR SPACE (2,750 SF TOTAL)

BUILDING U6
BUILDING AREA (PARKING AREA NOT INCLUDED):
LEVELS 1-2: 31,000 SQUARE FEET
TOTAL AREA: 43,100 SQUARE FEET
CONSTRUCTION TYPE: TYPE II-B
FIRE FLOW (REQ'D): 2,250 GPM W/ NFPA 13 SPRINKLER SYSTEM (4,500 GPM)

BUILDING U7
BUILDING AREA:
SUB-LEVEL: 37,840 SQUARE FEET - ACCESSORY PARKING
LEVELS 1-3: 25,000 SQUARE FEET (75,000 TOTAL)
LEVELS 4-5: 23,000 SQUARE FEET (46,000 TOTAL)
TOTAL AREA: 158,840 SQUARE FEET - BUSINESS OCCUPANCY (OFFICE)
CONSTRUCTION TYPE: TYPE II-B WITH SEPERATION BETWEEN B & S OCCUPANCIES
FIRE FLOW (REQ'D): 4,000 GPM W/ NFPA 13 SPRINKLER SYSTEM (8,000 GPM)
PARKING:
U7 (BLDG.) - 84 SPACES PROVIDED

BUILDING U8
BUILDING AREA (PARKING AREA NOT INCLUDED):
LEVEL 1: 7,000 SQUARE FEET
LEVEL 2: 4,500 SQUARE FEET
PER LEVEL: 33,552 SQUARE FEET
TOTAL AREA: 11,500 SQUARE FEET - BUSINESS OCCUPANCY (OFFICE)
CONSTRUCTION TYPE: TYPE I
FIRE FLOW (REQ'D): 1,000 GPM W/ NFPA 13 SPRINKLER SYSTEM (2,000 GPM)

UNIT/BED SUMMARY

BUILDINGS A1 - AFFORDABLE HOUSING
UNITS:
1 BED - 22 UNITS
2 BED - 12 UNITS
3 BED - 13 UNITS
TOTAL UNITS: 47

BUILDINGS A2 - AFFORDABLE HOUSING
UNITS:
1 BED - 22 UNITS
2 BED - 12 UNITS
3 BED - 13 UNITS
TOTAL UNITS: 47

BUILDINGS A3 - AFFORDABLE HOUSING
UNITS:
1 BED - 24 UNITS
2 BED - 16 UNITS
3 BED - 13 UNITS
TOTAL UNITS: 53

BUILDINGS A4 - AFFORDABLE HOUSING
UNITS:
1 BED - 24 UNITS
2 BED - 16 UNITS
3 BED - 13 UNITS
TOTAL UNITS: 53

BUILDING A5 - AFFORDABLE SENIOR HOUSING
UNITS:
1 BED - 53 UNITS
2 BED - 1 UNITS
TOTAL UNITS: 54

BUILDING U1 - MARKET RATE STUDENT HOUSING
UNITS:
1 BED - 35 UNITS
2 BED - 28 UNITS
3 BED - 9 UNITS
TOTAL UNITS: 72

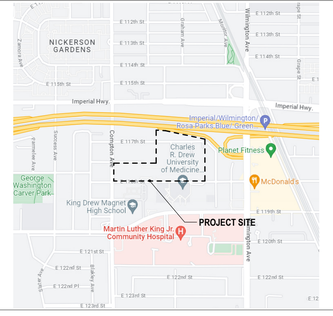
BUILDING U2 - MARKET RATE STUDENT HOUSING
UNITS:
1 BED - 40 UNITS
2 BED - 15 UNITS
3 BED - 15 UNITS
TOTAL UNITS: 70

BUILDING U3 - MARKET RATE STUDENT HOUSING
UNITS:
1 BED -
2 BED -
TOTAL UNITS: 108

BUILDING U4 - MARKET RATE FACULTY/STAFF HOUSING
UNITS:
1 BED - 30 UNITS
2 BED - 15 UNITS
3 BED - 10 UNITS
TOTAL UNITS: 55

NOTE: ALL AFFORDABLE UNITS DESIGNATED FOR LOWER-INCOME HOUSEHOLD

VICINITY MAP



SHEET INDEX

00.1 - ARCHITECTURE

A1.00	COVER SHEET
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A1.02	FIRE ACCESS SITE PLAN
A1.03	OVERALL SITE RENDERINGS
A4.01	SITE SECTION & ELEVATIONS
A4.02	SITE SECTION & ELEVATIONS
A4.03	SITE SECTION & ELEVATIONS
A4.04	SITE SECTION & ELEVATIONS

01 - ARCHITECTURAL SET - BLDG A1

A1-A1.1	PLANS
A1-A4.1	BUILDING ELEVATIONS

02 - ARCHITECTURAL SET - BLDG A2

A2-A1.1	PLANS

03 - ARCHITECTURAL SET - BLDG A3

A3-A1.1	PLANS

04 - ARCHITECTURAL SET - BLDG A4

A4-A1.1	PLANS

05 - ARCHITECTURAL SET - BLDG A5

A5-A1.1	PLANS
A5-A4.1	BUILDING ELEVATIONS

06 - ARCHITECTURAL SET - BLDG U1

U1-A1.1	PLANS

07 - ARCHITECTURAL SET - BLDG U2

U2-A1.1	PLANS
U2-A4.1	BUILDING ELEVATIONS

08 - ARCHITECTURAL SET - BLDG U3

U3-A1.1	PLANS
U3-A5.1	BUILDING ELEVATIONS

09 - ARCHITECTURAL SET - BLDG U4

U4-A1.1	PLANS
U4-A4.1	BUILDING ELEVATIONS

10 - ARCHITECTURAL SET - BLDG U6

U6-A1.1	PLANS
U6-A4.1	BUILDING ELEVATIONS

11 - ARCHITECTURAL SET - BLDG U7

U7-A1.1	PLANS
U7-A1.2	PLANS
U7-A4.1	BUILDING ELEVATIONS

12 - ARCHITECTURAL SET - BLDG U8

U8-A1.1	PLANS
U8-A1.2	PLANS
U8-A1.3	PLANS
U8-A1.4	PLANS
U8-A5.1	BUILDING ELEVATIONS
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13 - ARCHITECTURAL SET - RESIDENTIAL UNIT PLANS

A0.3.1	UNIT PLANS
A0.3.2	UNIT PLANS

CIVIL

C1.00	EXISTING CONDITIONS (FOR REFERENCE ONLY)
C1.00E	EXISTING CONDITIONS (FOR REFERENCE ONLY)
C1.20	DEMOLITION PLAN
C1.30	GRADING PLAN
C1.30G	GRADING PLAN
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LANDSCAPE

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L0-01	OVERALL SITE PLAN
L0-02	TREE PLANTING PLAN
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L0-04	PLANTING PLAN
L0-05	BICYCLE PARKING LAYOUT PLAN
L0-06	OPEN SPACE REQUIREMENTS PLAN

CMWC, LLC

Exhibit A

21001.00

1667 EAST 18TH STREET
LOS ANGELES, CALIFORNIA 90059

Frederick Fisher and **Partners**
12248 Santa Monica Blvd.
Los Angeles, CA 90025

ISSUED FOR	DATE
1 SITE PLAN - RESUBMITTAL II	09/17/2024
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4 SITE PLAN - RESUBMITTAL V	07/01/2025
5 SITE PLAN - RESUBMITTAL VI	11/05/2025

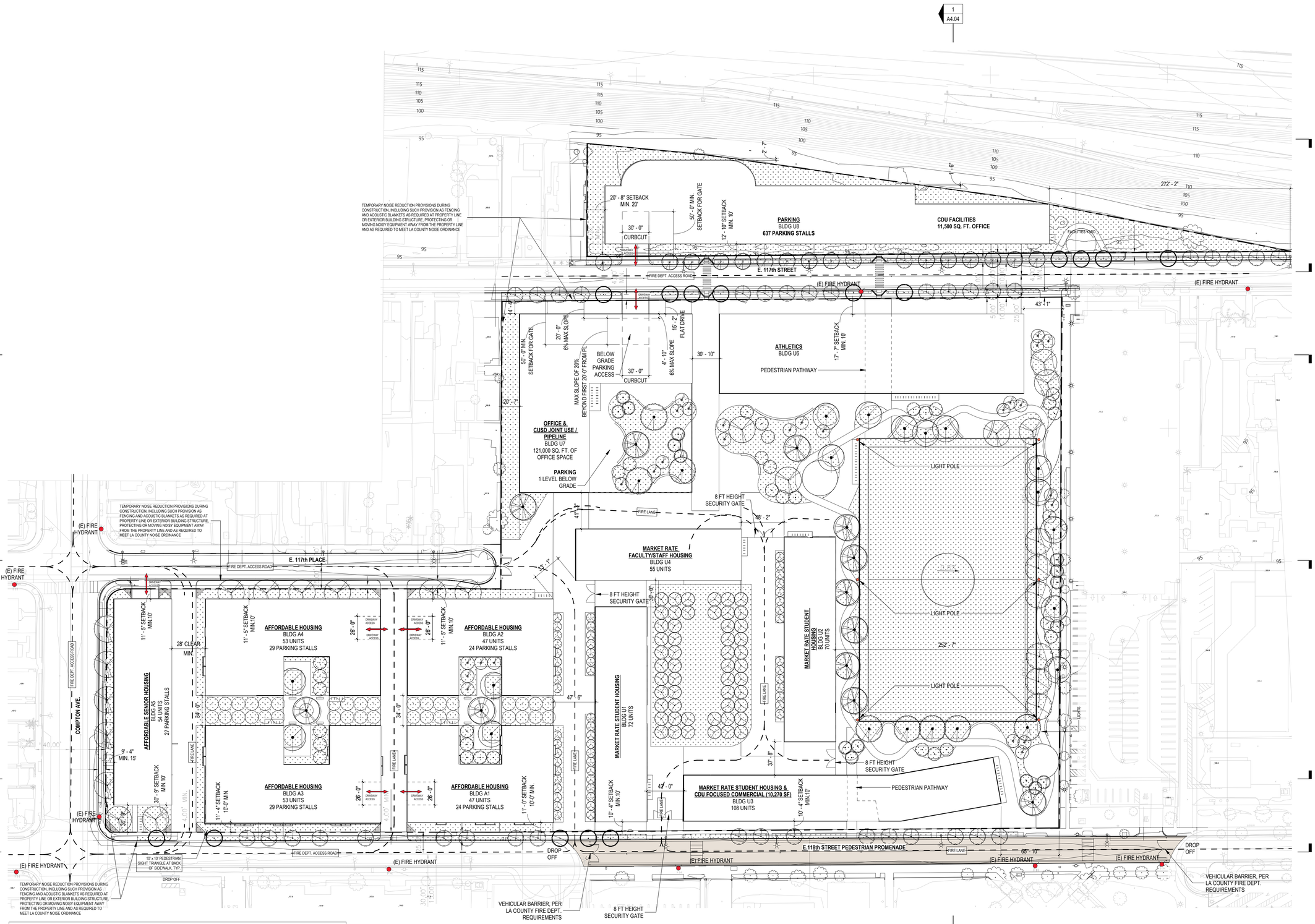
COVER SHEET

SCALE: 12" = 1'-0"

A1.00

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NOTES

A. PROVIDE A FOUR-FOOT CLEARANCE FROM THE TOP OF "X" OF ALL PROPOSED DRIVEWAYS TO ANY EXISTING/PROPOSED IMPROVEMENT (I.E., STREETLIGHTS).
B. 10' BY 10' PEDESTRIAN SIGHT TRIANGLES FROM ALL DRIVEWAYS TO THE BACK OF THE SIDEWALK FRONTING THE SITE.
C. PROVIDE 50-FOOT MINIMUM SETBACK FROM THE STREET RIGHT OF WAY FOR ALL PROPOSED GATES.
D. LONG TERM BICYCLE PARKING: REQUIRED SPACES = 329; PROVIDED SPACES = 329

1 SITE PLAN
SCALE: 1" = 50'-0"

N

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Exhibit A

21001.00

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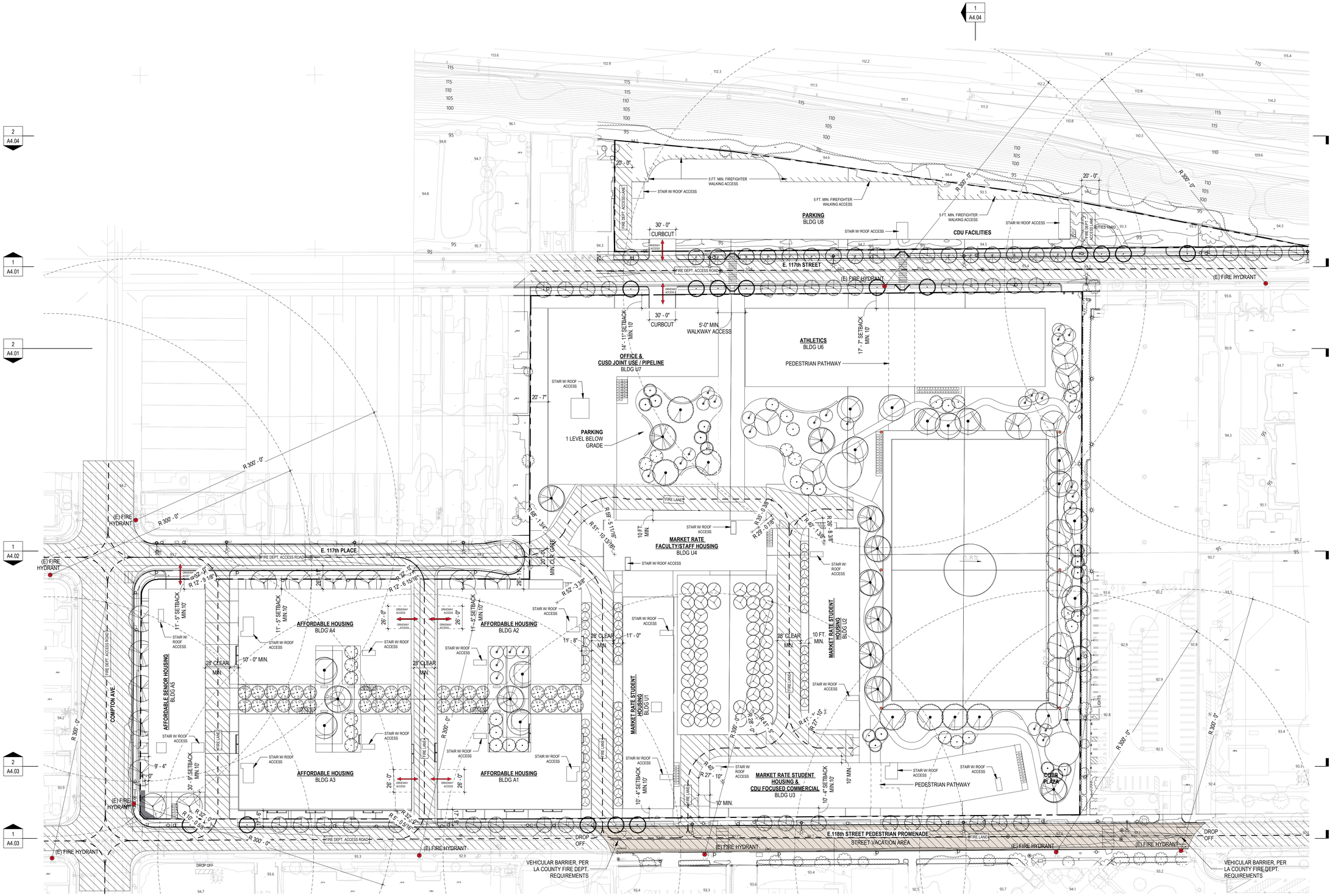
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SITE PLAN

SCALE: As indicated

A1.01

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NOTES

A. THE FIRE APPARATUS ACCESS ROAD SHALL PROVIDE A MINIMUM UNOBSTRUCTED WIDTH OF 28 FEET, EXCLUSIVE OF SHOULDERS AND AN UNOBSTRUCTED VERTICAL CLEARANCE "CLEAR TO SKY" DUE TO THE BUILDING HEIGHT EXCEEDING A DISTANCE OF 30 FEET BETWEEN THE FIRE APPARATUS ACCESS ROAD AND THE HIGHEST ROOF SURFACE. THE FIRE APPARATUS ACCESS ROAD SHALL BE LOCATED BETWEEN 10 FEET AND 30 FEET FROM THE BUILDING AND SHALL BE POSITIONED PARALLEL TO ONE ENTIRE SIDE OF THE BUILDING. FIRE CODE 503.2.1.2.2 & 503.2.1.2.2.1

B. DEAD-END FIRE APPARATUS ACCESS ROADS IN EXCESS OF 150 FEET IN LENGTH SHALL BE PROVIDED WITH AN APPROVED FIRE DEPARTMENT TURNAROUND. FIRE CODE 503.2.5

C. ALL FIRE HYDRANTS SHALL MEASURE 6"X 4"X 2-1/2" BRASS OR BRONZE, CONFORMING TO CURRENT AWWA STANDARD C503 OR APPROVED EQUAL, AND SHALL BE INSTALLED IN ACCORDANCE WITH THE COUNTY OF LOS ANGELES FIRE CODE.

D. OVERHEAD POWER LINES AT THE FRONTAGE OF BUILDINGS GREATER THAN 30' IN HEIGHT, WITH NO SHOWN ON-SITE ACCESS, MUST BE PLACED UNDERGROUND DUE TO THE OBSTRUCTION CREATED FOR LADDERING OPERATIONS. NO PROPOSED BUILDINGS MEET THIS REQUIREMENT

E. 504.1 REQUIRED ACCESS - EXTERIOR DOORS AND OPENINGS REQUIRED BY THIS CODE OR THE CALIFORNIA BUILDING CODE SHALL BE MAINTAINED READILY ACCESSIBLE FOR EMERGENCY ACCESS BY THE FIRE DEPARTMENT. AN APPROVED ACCESS WALKWAY LEADING FROM FIRE APPARATUS ACCESS ROADS TO EXTERIOR OPENINGS SHALL BE PROVIDED WHERE REQUIRED BY THE FIRE CODE OFFICIAL.

F. PROVIDE A MINIMUM 32-FOOT CENTERLINE TURNING RADIUS FOR THE FIRE APPARATUS ACCESS ROAD. INDICATE THE CENTERLINE, INSIDE AND OUTSIDE TURNING RADII FOR EACH CHANGE IN DIRECTION, ON THE PLAN. FIRE CODE 503.2.4

G. FIREFIGHTER WALKWAY ACCESS ROUTES LEADING FROM THE FIRE DEPARTMENT ACCESS ROAD TO ALL REQUIRED OPENINGS IN THE BUILDING'S EXTERIOR WALLS FOR FIREFIGHTING AND RESCUE PURPOSES ON THE PLAN, ARE REQUIRED WIDTH OF 5 FEET MIN. FIRE CODE 504.1

H. WHEN SECURITY GATES ARE PROVIDED, MAINTAIN A MINIMUM ACCESS WIDTH OF 20 FEET. THE SECURITY GATE SHALL BE PROVIDED WITH AN APPROVED MEANS OF EMERGENCY OPERATION AND SHALL BE MAINTAINED OPERATIONAL AT ALL TIMES AND REPLACED OR REPAIRED WHEN DEFECTIVE. ELECTRIC GATE OPERATORS, WHERE PROVIDED, SHALL BE LISTED IN ACCORDANCE WITH UL 325. GATES INTENDED FOR AUTOMATIC OPERATION SHALL BE DESIGNED, CONSTRUCTED AND INSTALLED TO COMPLY WITH THE REQUIREMENTS OF ASTM F220. GATES SHALL BE OF THE SWINGING OR SLIDING TYPE. CONSTRUCTION OF GATES SHALL BE OF MATERIALS THAT ALLOW MANUAL OPERATION BY ONE PERSON. (FIRE CODE 503.6)

1 FIRE ACCESS SITE PLAN
SCALE: 1" = 50'-0"

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FIRE ACCESS SITE PLAN

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A1.02













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5	SITE PLAN - RESUBMITTAL VI	11/05/2025

OVERALL SITE RENDERINGS

SCALE:

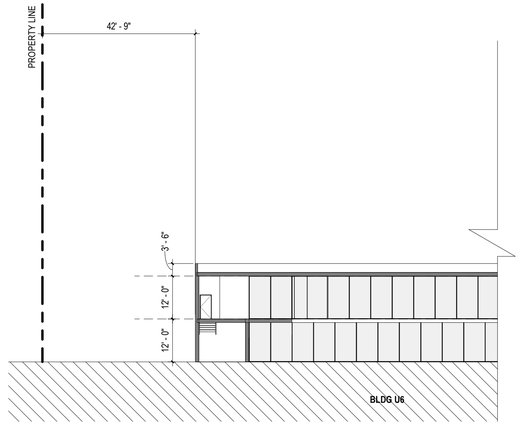
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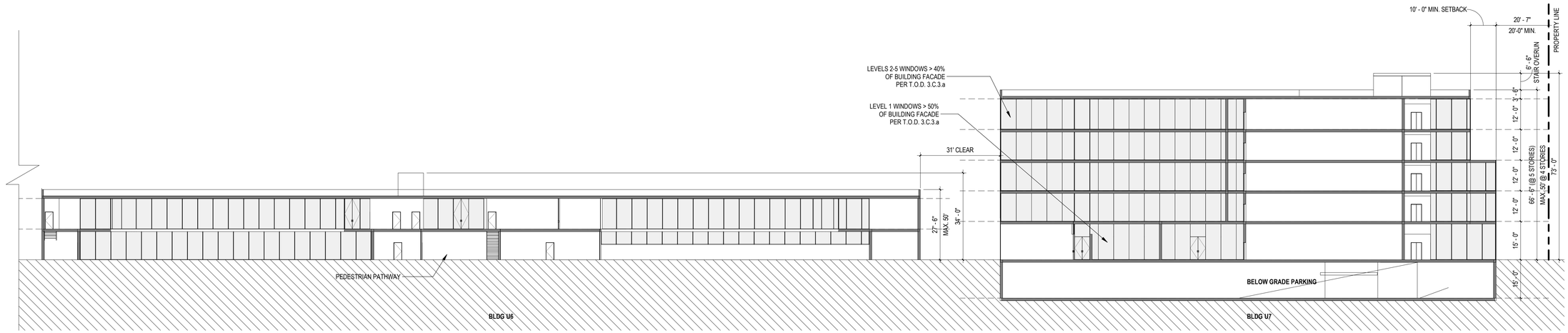
NOTES

MINIMUM TRANSPARENCY REQUIREMENTS. PER WILLOWBROOK TOD SPECIFIC PLAN CHAPTER 3 SECTION 3

A. WINDOWS AND OPENINGS FACING STREETS SHALL CONSTITUTE A MINIMUM OF 50 PERCENT OF STREET-LEVEL BUILDING FACADES, WITH THE EXCEPTION OF RESIDENTIAL UNITS WITH INDIVIDUAL ENTRIES, IN WHICH CASE WINDOWS AND OPENINGS FACING STREETS SHALL CONSTITUTE A MINIMUM OF 30 PERCENT OF STREET-LEVEL BUILDING FACADES.

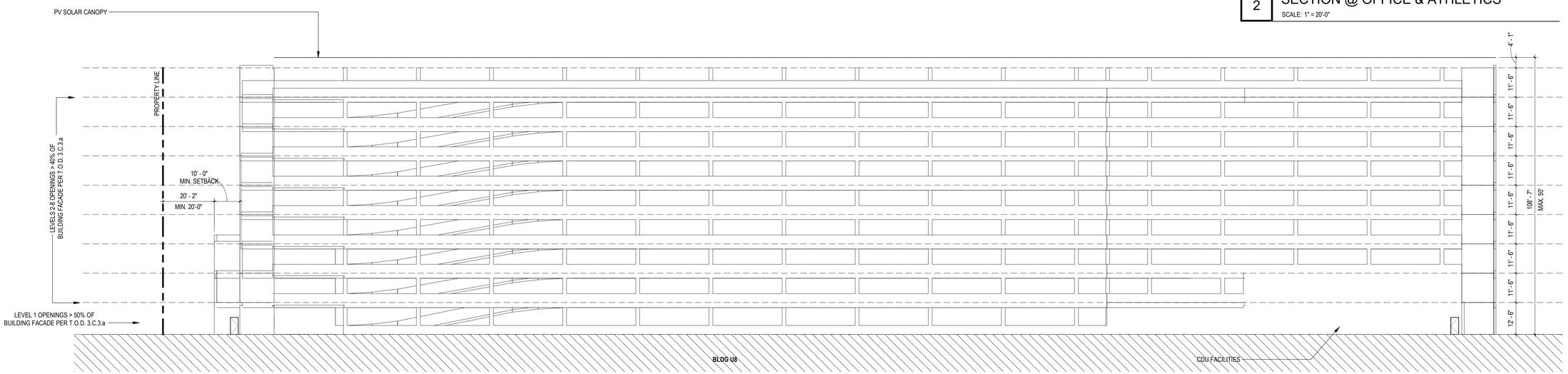
B. ON UPPER-FLOORS, WINDOWS AND OPENINGS FACING STREETS SHALL CONSTITUTE A MINIMUM OF 40 PERCENT OF BUILDING FACADES FOR COMMERCIAL USES, AND 20 PERCENT OF BUILDING FACADES FOR RESIDENTIAL USES.





2 SECTION @ OFFICE & ATHLETICS

SCALE: 1" = 20'-0"



1 SOUTH ELEVATION @ PARKING

SCALE: 1" = 20'-0"

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5 SITE PLAN - RESUBMITTAL VI	11/05/2025

SITE SECTION & ELEVATIONS

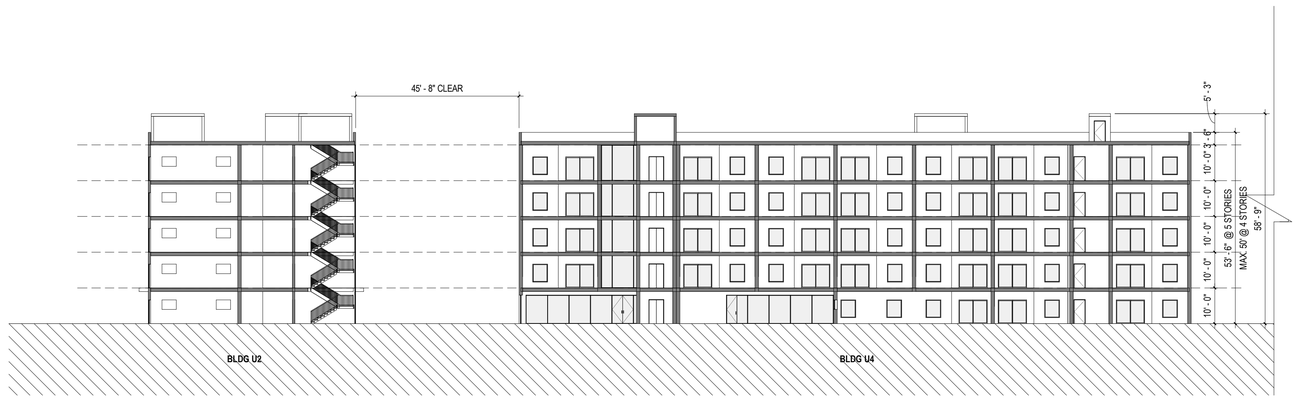
SCALE: As indicated

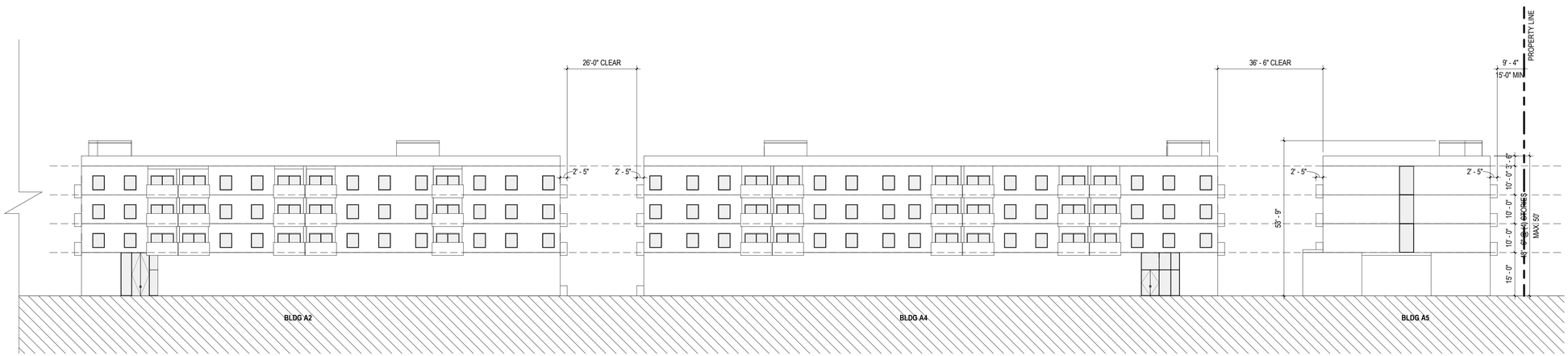
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NOTES

MINIMUM TRANSPARENCY REQUIREMENTS. PER WILLOWBROOK TOD SPECIFIC PLAN CHAPTER 3 SECTION 3
A. WINDOWS AND OPENINGS FACING STREETS SHALL CONSTITUTE A MINIMUM OF 50 PERCENT OF STREET-LEVEL BUILDING FACADES, WITH THE EXCEPTION OF RESIDENTIAL UNITS WITH INDIVIDUAL ENTRIES, IN WHICH CASE WINDOWS AND OPENINGS FACING STREETS SHALL CONSTITUTE A MINIMUM OF 30 PERCENT OF STREET-LEVEL BUILDING FACADES.
B. ON UPPER-FLOORS, WINDOWS AND OPENINGS FACING STREETS SHALL CONSTITUTE A MINIMUM OF 40 PERCENT OF BUILDING FACADES FOR COMMERCIAL USES, AND 20 PERCENT OF BUILDING FACADES FOR RESIDENTIAL USES.





1 SECTION & ELEVATIONS @ HOUSING
SCALE: 1" = 20'-0"

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5	SITE PLAN - RESUBMITTAL VI	11/05/2025

SITE SECTION & ELEVATIONS

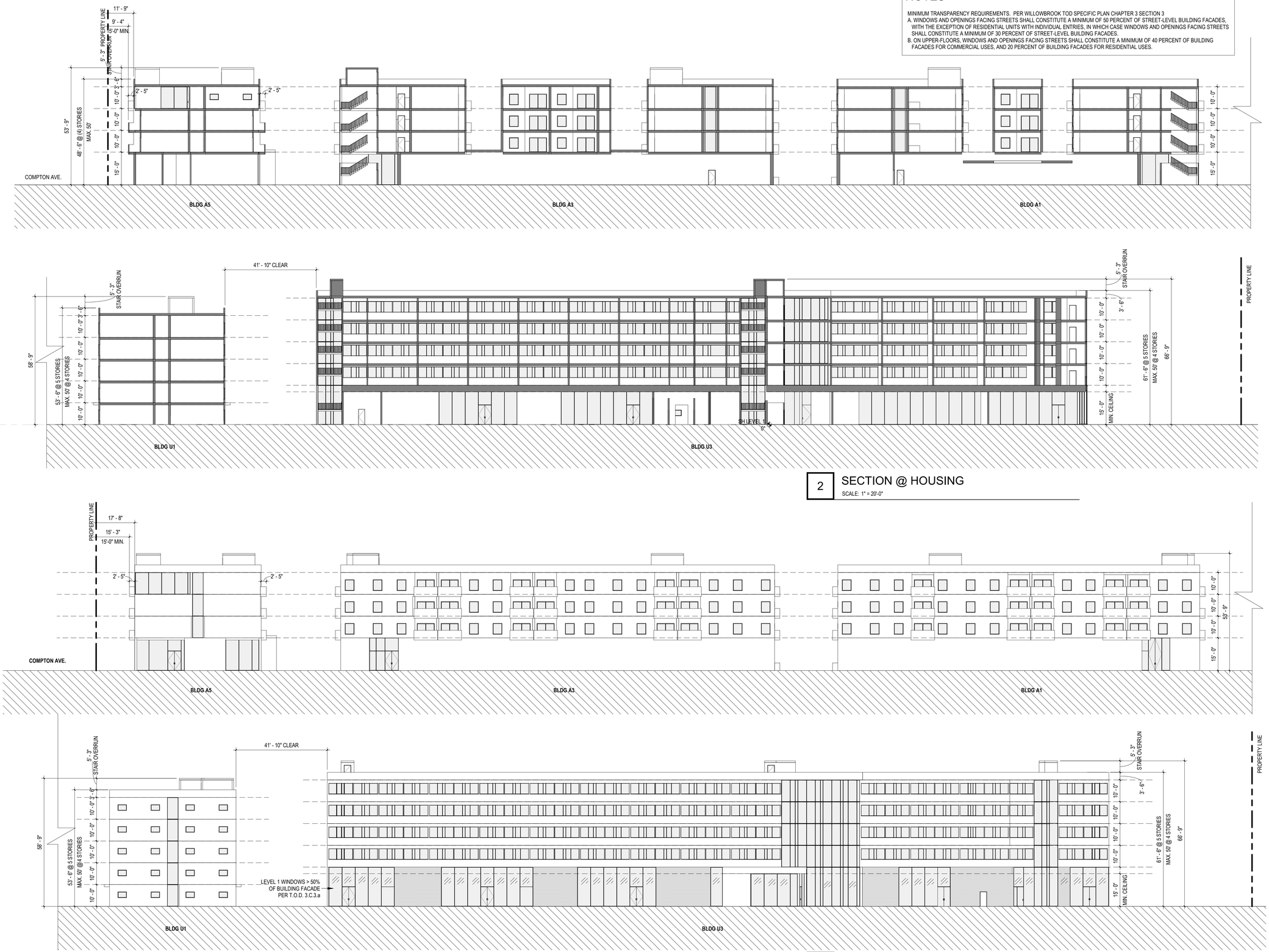
SCALE: As indicated

A4.02

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NOTES

MINIMUM TRANSPARENCY REQUIREMENTS. PER WILLOWBROOK TOD SPECIFIC PLAN CHAPTER 3 SECTION 3
A. WINDOWS AND OPENINGS FACING STREETS SHALL CONSTITUTE A MINIMUM OF 50 PERCENT OF STREET-LEVEL BUILDING FACADES, WITH THE EXCEPTION OF RESIDENTIAL UNITS WITH INDIVIDUAL ENTRIES, IN WHICH CASE WINDOWS AND OPENINGS FACING STREETS SHALL CONSTITUTE A MINIMUM OF 30 PERCENT OF STREET-LEVEL BUILDING FACADES.
B. ON UPPER-FLOORS, WINDOWS AND OPENINGS FACING STREETS SHALL CONSTITUTE A MINIMUM OF 40 PERCENT OF BUILDING FACADES FOR COMMERCIAL USES, AND 20 PERCENT OF BUILDING FACADES FOR RESIDENTIAL USES.



2 SECTION @ HOUSING
SCALE: 1" = 20'-0"

1 SOUTH ELEVATIONS @ HOUSING
SCALE: 1" = 20'-0"

CMWC, LLC

Exhibit A

21001.00

1667 EAST 18TH STREET
LOS ANGELES, CALIFORNIA 90059

Frederick Fisher and Partners
12248 Santa Monica Blvd.
Los Angeles, CA 90025

CHARLES R. DREW UNIVERSITY OF MEDICINE AND SCIENCE — CDU

CENTURY

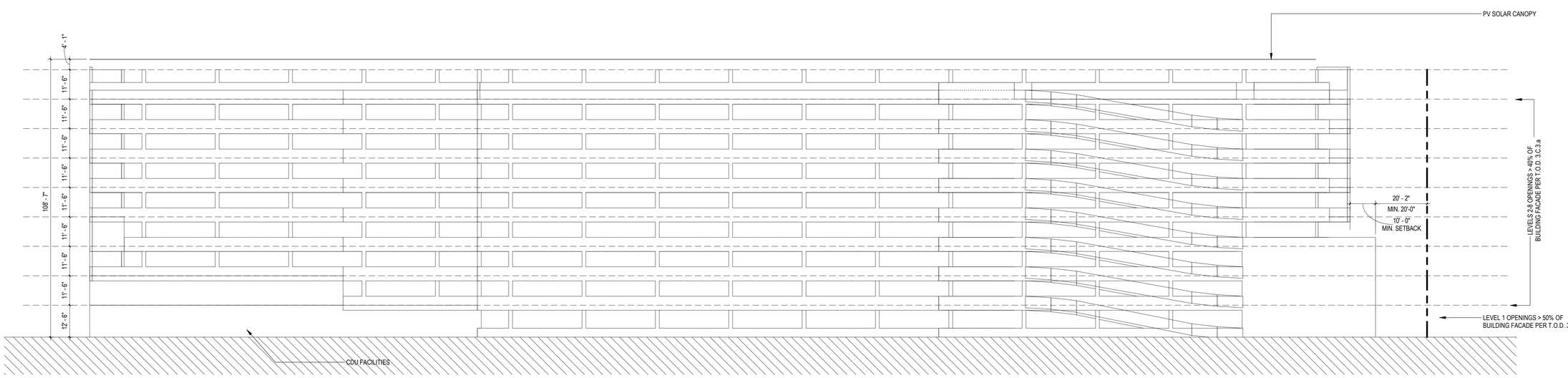
ISSUED FOR	DATE
1 SITE PLAN - RESUBMITTAL II	09/17/2024
2 SITE PLAN - RESUBMITTAL III	01/27/2025
3 SITE PLAN - RESUBMITTAL IV	03/27/2025
4 SITE PLAN - RESUBMITTAL V	07/01/2025
5 SITE PLAN - RESUBMITTAL VI	11/05/2025

SITE SECTION & ELEVATIONS

SCALE: As indicated

A4.03

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2 NORTH ELEVATION @ PARKING

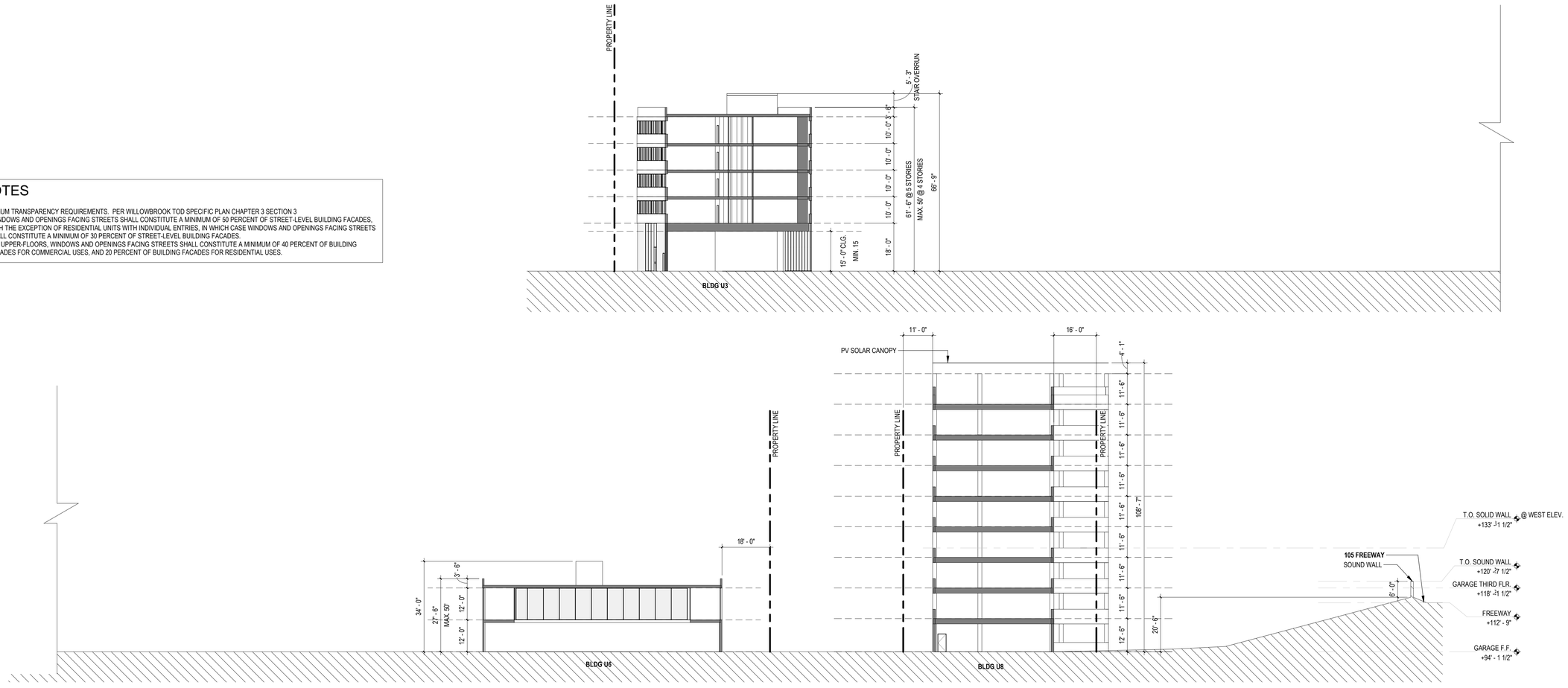
SCALE: 1" = 20'-0"

NOTES

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B. ON UPPER-FLOORS, WINDOWS AND OPENINGS FACING STREETS SHALL CONSTITUTE A MINIMUM OF 40 PERCENT OF BUILDING FACADES FOR COMMERCIAL USES, AND 20 PERCENT OF BUILDING FACADES FOR RESIDENTIAL USES.



1 SECTION @ BLDG. U8, U6 & U3

SCALE: 1" = 20'-0"

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Exhibit A

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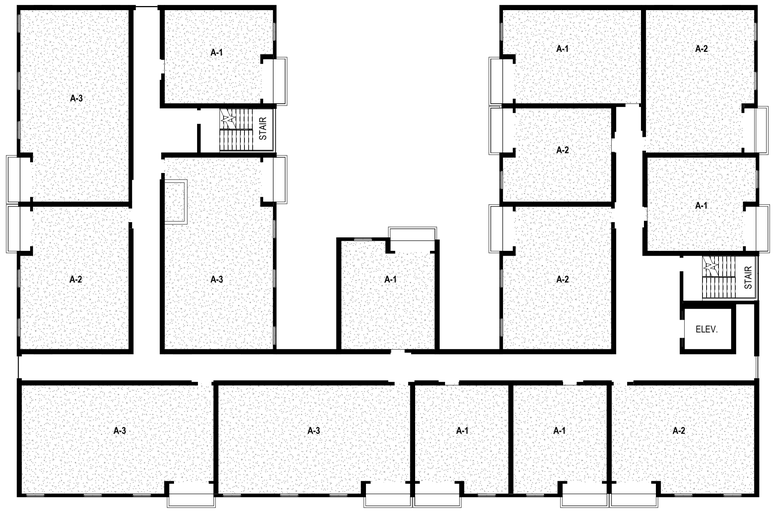
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2	SITE PLAN - RESUBMITTAL III	01/27/2025
3	SITE PLAN - RESUBMITTAL IV	03/27/2025
4	SITE PLAN - RESUBMITTAL V	07/01/2025
5	SITE PLAN - RESUBMITTAL VI	11/05/2025

SITE SECTION & ELEVATIONS

SCALE: As indicated

A4.04

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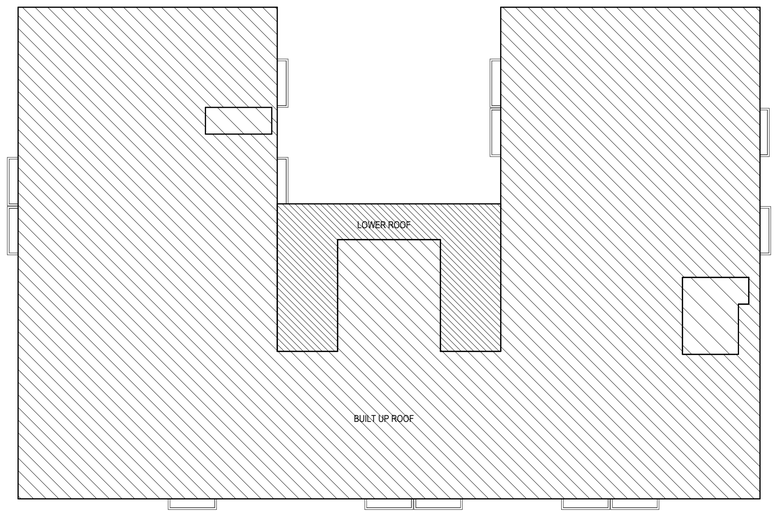
2 A1 - LEVELS 2-4
SCALE: 1/16" = 1'-0"

NOTES

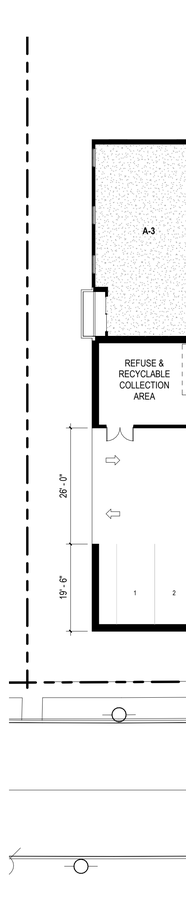
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A. ALL MECHANICAL EQUIPMENT SHALL BE SCREENED FROM PUBLIC VIEW. THIS INCLUDES ALL GROUND, WALL AND ROOF MOUNTED EQUIPMENT.
B. SCREENING ELEMENTS SHALL BE INTEGRAL PART OF THE BUILDING; NO SCREENING METHOD SHALL GIVE THE APPEARANCE OF BEING "TACKED ON"

NOTES

1. ALL DECKS / BALCONIES COMPLY WITH WILLOWBROOK T.O.D. REQUIREMENT OF 50 SF OF PRIVATE OUTDOOR SPACE PER DWELLING UNIT. - TABLE 3-5: DEVELOPMENT STANDARDS FOR MIXED USES.
2. BUILDING A1 - AFFORDABLE HOUSING:
   LEVEL 1:
   2 UNITS x 50 SF PER UNIT =
   100 SF OF PRIVATE OUTDOOR SPACE
   LEVELS 2-4:
   15 UNITS PER FLOOR x 50 SF PER UNIT =
   750 SF PER FLOOR x 3 =
   2,350 SF OF TOTAL PRIVATE OUTDOOR SPACE
3. AFFORDABLE UNITS WILL BE FOR LOWER-INCOME HOUSEHOLDS
4. 46 AFFORDABLE UNITS
   1 MARKET RATE MANAGER'S UNIT
   47 TOTAL UNITS
5. LONG TERM BICYCLE PARKING:
   REQUIRED SPACES = 24
   PROVIDED SPACES = 24
6. THE RESIDENT ACTIVITIES ROOM WILL BE USED FOR MEETING, SOCIAL GATHERINGS, SERVICES AND OTHER FUNCTIONS FOR THE RESIDENTS OF THE BUILDING.



3 A1 - ROOF
SCALE: 1/16" = 1'-0"



1 A1 - LEVEL 1
SCALE: 1/16" = 1'-0"

0 8' 16' 32' N

CMWC, LLC

Exhibit A

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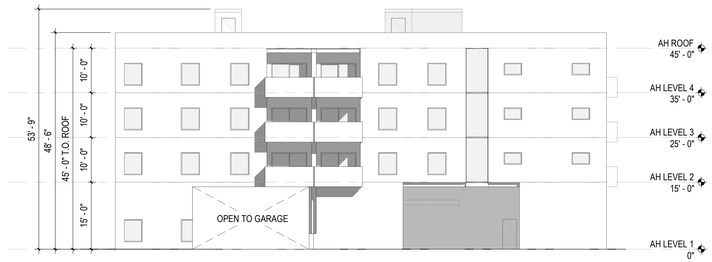
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	ISSUED FOR	DATE
1	SITE PLAN - RESUBMITTAL II	09/17/2024
2	SITE PLAN - RESUBMITTAL III	01/27/2025
3	SITE PLAN - RESUBMITTAL IV	03/27/2025
4	SITE PLAN - RESUBMITTAL V	07/01/2025
5	SITE PLAN - RESUBMITTAL VI	11/05/2025

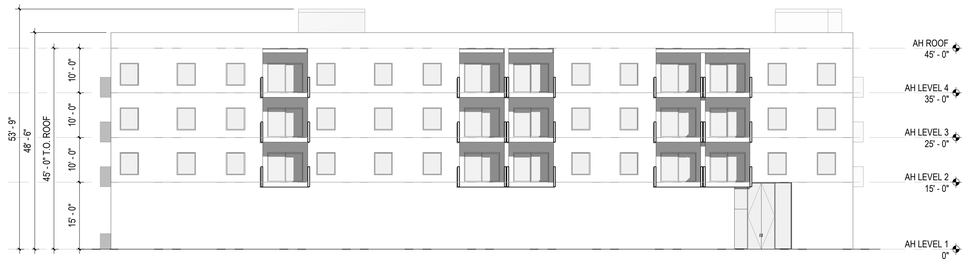
PLANS

SCALE: As indicated

A1-A1.1



5 A1 - WEST
SCALE: 1/16" = 1'-0"



4 A1 - SOUTH
SCALE: 1/16" = 1'-0"



3 A1 - EAST
SCALE: 1/16" = 1'-0"



2 A1 - NORTH
SCALE: 1/16" = 1'-0"

NOTES

A. THESE ELEVATIONS ARE REPRESENTATIVE OF BUILDINGS: A1, A2, A3 & A4

NOTES

MINIMUM TRANSPARENCY REQUIREMENTS. PER WILLOWBROOK TOD SPECIFIC PLAN CHAPTER 3 SECTION 3
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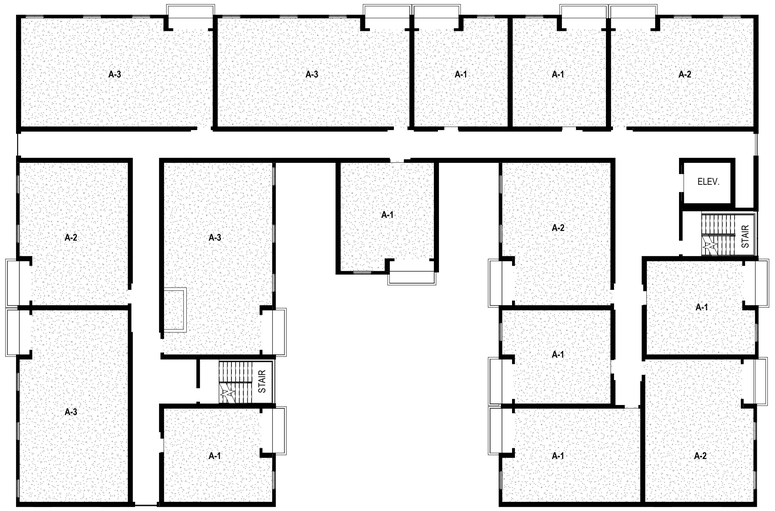
ISSUED FOR	DATE
4 SITE PLAN - RESUBMITTAL V	07/01/2025
5 SITE PLAN - RESUBMITTAL VI	11/05/2025

BUILDING ELEVATIONS

SCALE: As indicated

A1-A4.1

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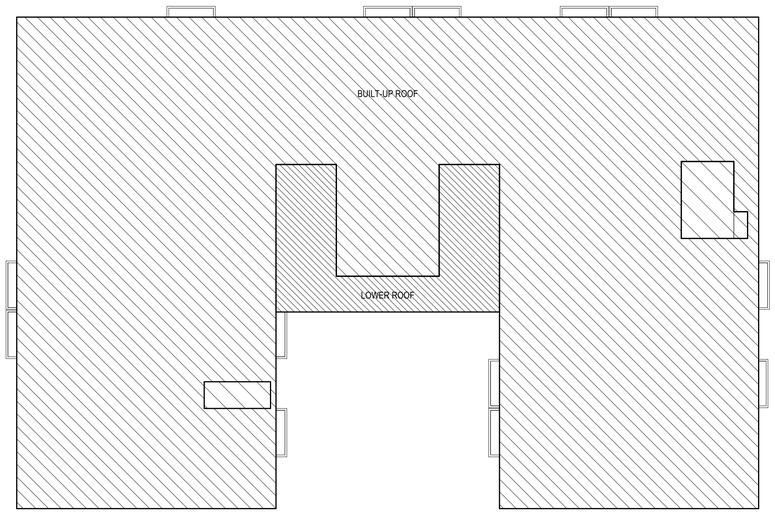
2 A2 - LEVEL 2-4
SCALE: 1/16" = 1'-0"

NOTES

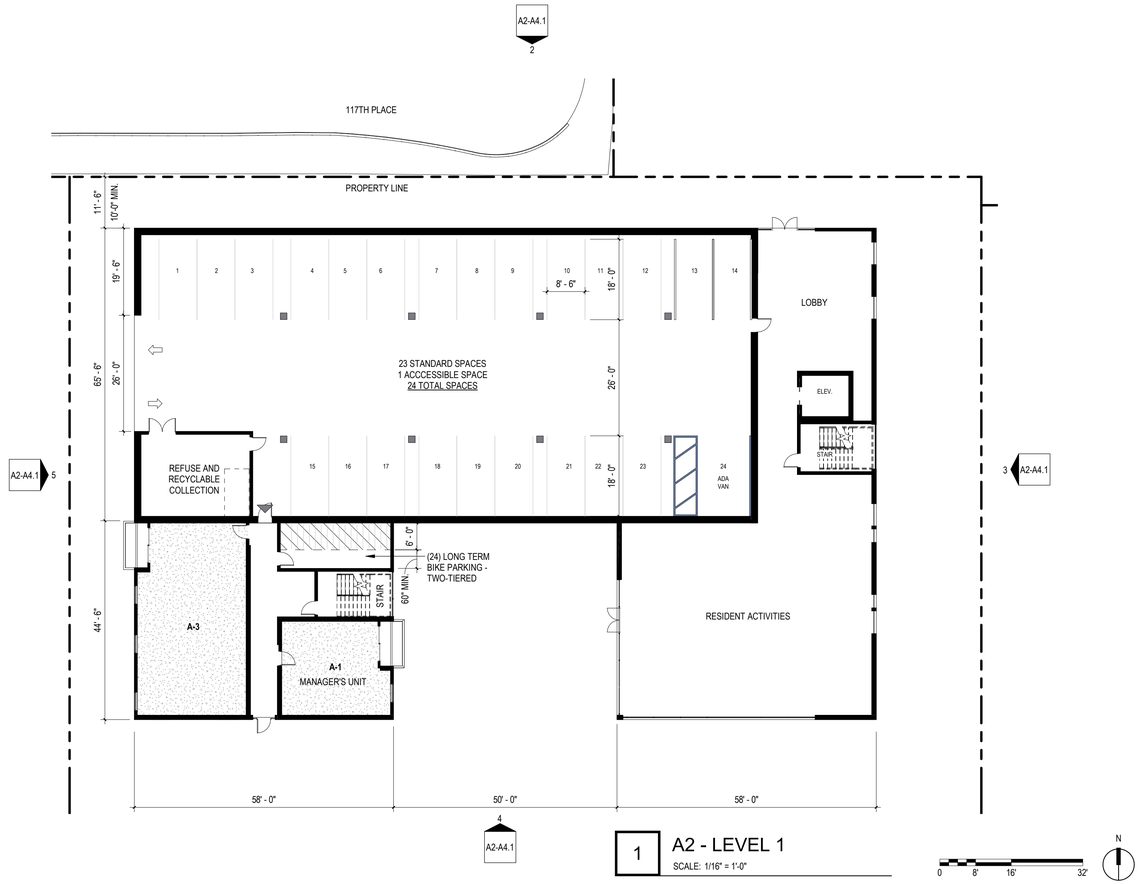
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B. SCREENING ELEMENTS SHALL BE INTEGRAL PART OF THE BUILDING; NO SCREENING METHOD SHALL GIVE THE APPEARANCE OF BEING "TACKED ON"

NOTES

1. ALL DECKS / BALCONIES COMPLY WITH WILLOWBROOK T.O.D. REQUIREMENT OF 50 SF OF PRIVATE OUTDOOR SPACE PER DWELLING UNIT. - TABLE 3-5: DEVELOPMENT STANDARDS FOR MIXED USES.
2. BUILDING A2 - AFFORDABLE HOUSING:
   LEVEL 1:
   2 UNITS x 50 PER UNIT
   100 SF OF PRIVATE OUTDOOR SPACE
   LEVELS 2-4:
   15 UNITS PER FLOOR x 50 SF PER UNIT =
   750 SF PER FLOOR x 3 =
   2,350 SF OF TOTAL PRIVATE OUTDOOR SPACE
3. AFFORDABLE UNITS WILL BE FOR LOWER-INCOME HOUSEHOLDS
4. 46 AFFORDABLE UNITS
   1 MARKET RATE MANAGER'S UNIT
   47 TOTAL UNITS
5. LONG TERM BICYCLE PARKING:
   REQUIRED SPACES = 24
   PROVIDED SPACES = 24
6. THE RESIDENT ACTIVITIES ROOM WILL BE USED FOR MEETING, SOCIAL GATHERINGS, SERVICES AND OTHER FUNCTIONS FOR THE RESIDENTS OF THE BUILDING.



3 A2 - ROOF
SCALE: 1/16" = 1'-0"



1 A2 - LEVEL 1
SCALE: 1/16" = 1'-0"

0 8' 16' 32' N

CMWC, LLC

Exhibit A

21001.00

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LOS ANGELES, CALIFORNIA 90059

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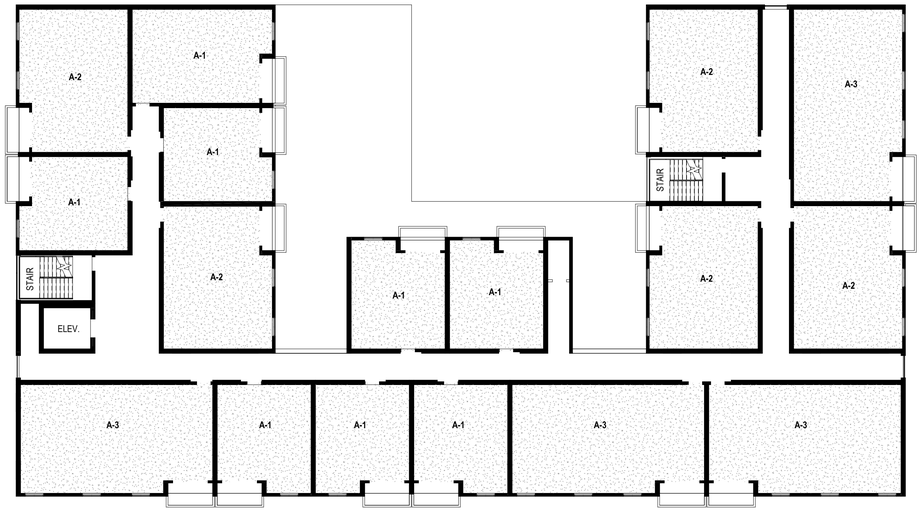
ISSUED FOR		DATE
1	SITE PLAN - RESUBMITTAL II	09/17/2024
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4	SITE PLAN - RESUBMITTAL V	07/01/2025
5	SITE PLAN - RESUBMITTAL VI	11/05/2025

PLANS

SCALE: As indicated

A2-A1.1

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2 A3 - LEVEL 2-4
SCALE: 1/16" = 1'-0"

NOTES

SECTION C-13:

A. ALL MECHANICAL EQUIPMENT SHALL BE SCREENED FROM PUBLIC VIEW. THIS INCLUDES ALL GROUND, WALL AND ROOF MOUNTED EQUIPMENT.

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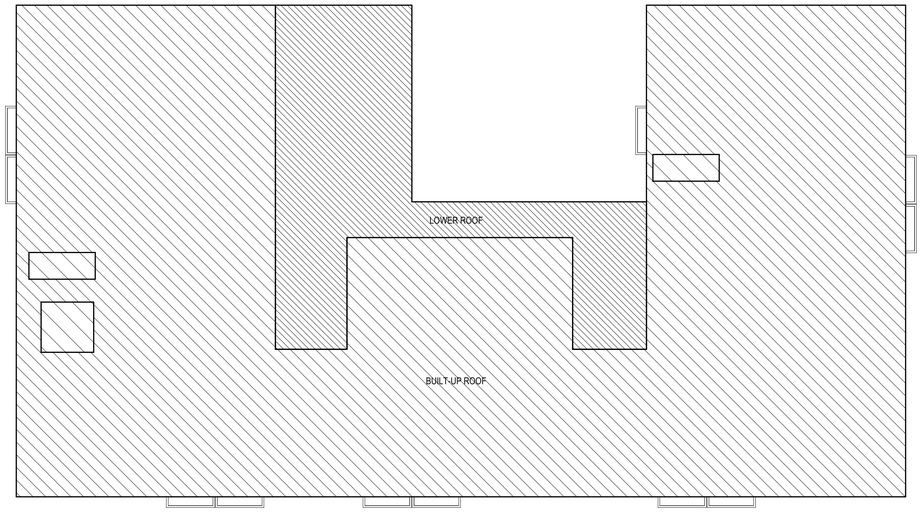
2. BUILDING A3 - AFFORDABLE HOUSING:
   LEVEL 1:
   2 UNITS x 50 SF PER UNIT =
   100 SF OF PRIVATE OUTDOOR SPACE
   LEVELS 2-4:
   17 UNITS PER FLOOR x 50 SF PER UNIT =
   850 SF PER FLOOR x 3 =
   2,650 SF OF TOTAL PRIVATE OUTDOOR SPACE

3. AFFORDABLE UNITS WILL BE FOR LOWER-INCOME HOUSEHOLDS

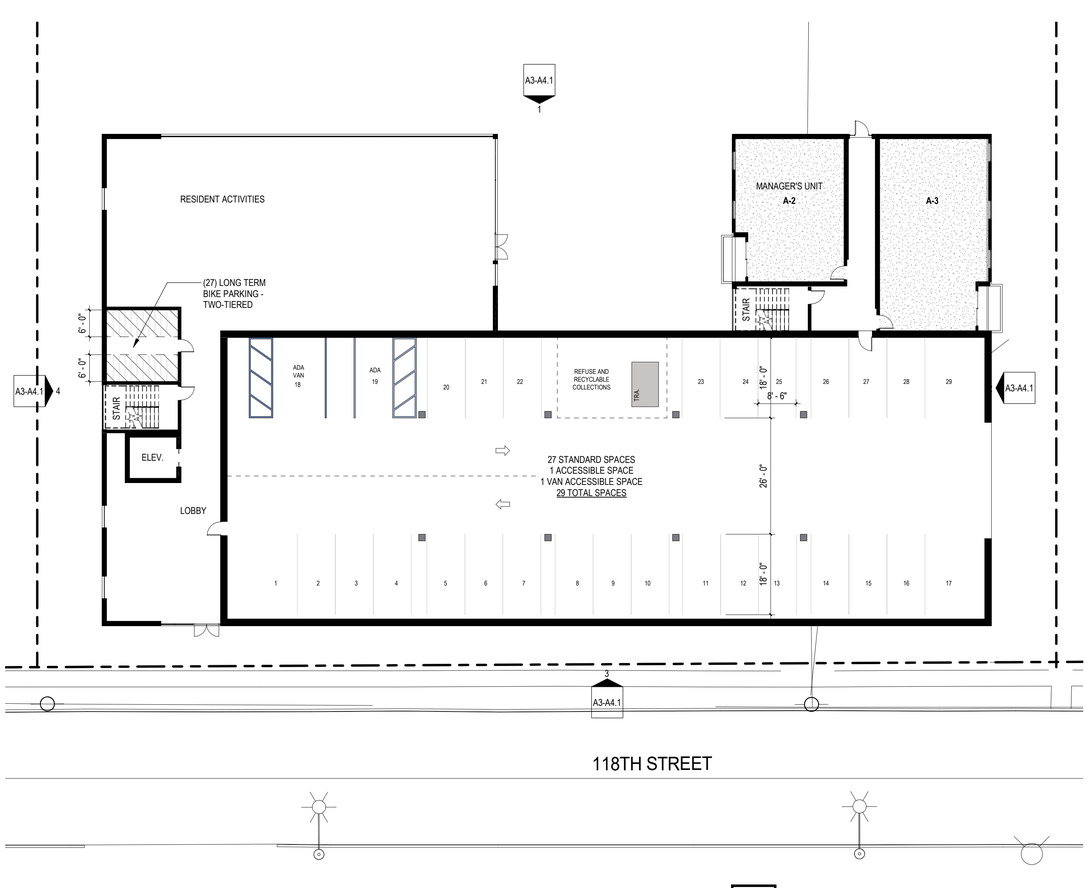
4. 52 AFFORDABLE UNITS
   1 MARKET RATE MANAGER'S UNIT
   53 TOTAL UNITS

5. LONG TERM BICYCLE PARKING:
   REQUIRED SPACES = 27
   PROVIDED SPACES = 27

6. THE RESIDENT ACTIVITIES ROOM WILL BE USED FOR MEETING, SOCIAL GATHERINGS, SERVICES AND OTHER FUNCTIONS FOR THE RESIDENTS OF THE BUILDING.



3 A3 - ROOF
SCALE: 1/16" = 1'-0"



1 A3 - LEVEL 1
SCALE: 1/16" = 1'-0"

0 8' 16' 32'

N

CMWC, LLC

Exhibit A

21001.00

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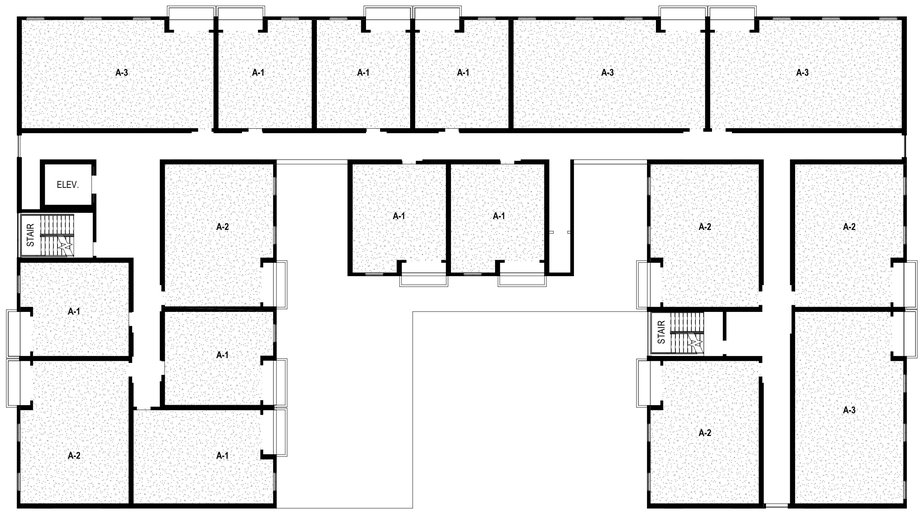
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4 SITE PLAN - RESUBMITTAL V	07/01/2025
5 SITE PLAN - RESUBMITTAL VI	11/05/2025

PLANS

SCALE: As indicated

A3-A1.1

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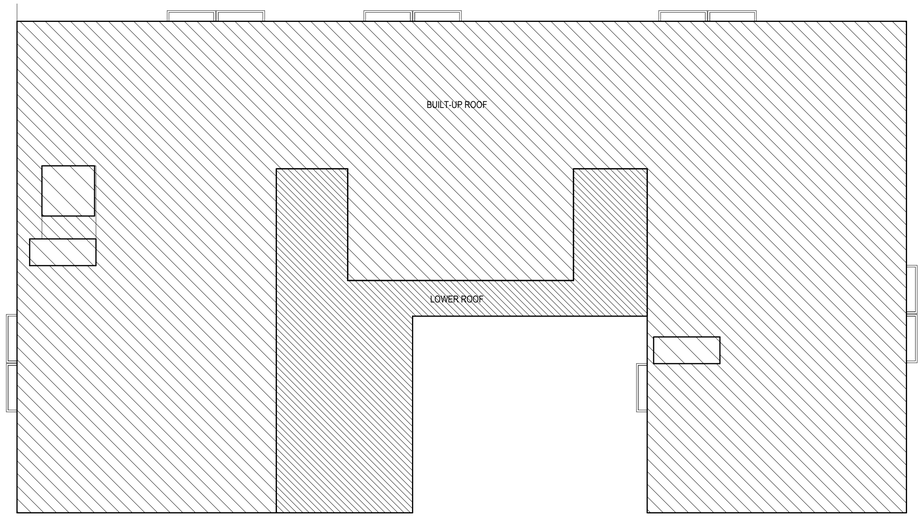
2 A4 - LEVEL 2-4
SCALE: 1/16" = 1'-0"

NOTES

SECTION C-13:
A. ALL MECHANICAL EQUIPMENT SHALL BE SCREENED FROM PUBLIC VIEW. THIS INCLUDES ALL GROUND, WALL AND ROOF MOUNTED EQUIPMENT.
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NOTES

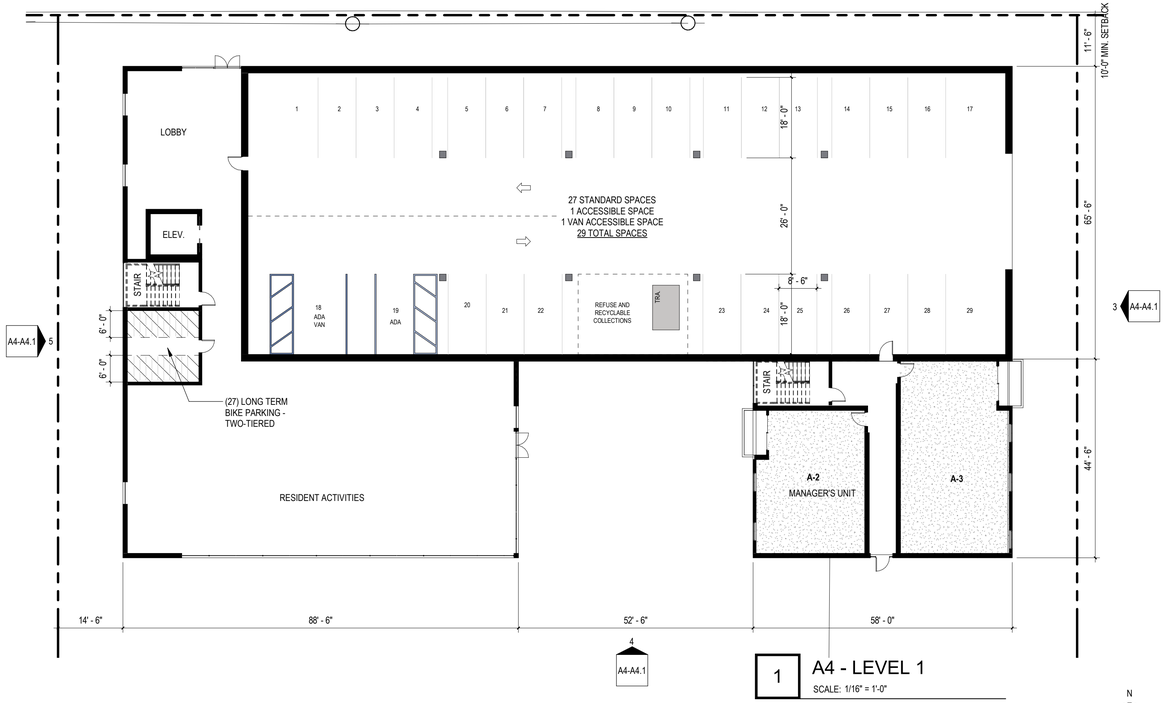
1. ALL DECKS / BALCONIES COMPLY WITH WILLOWBROOK T.O.D. REQUIREMENT OF 50 SF OF PRIVATE OUTDOOR SPACE PER DWELLING UNIT. - TABLE 3-5: DEVELOPMENT STANDARDS FOR MIXED USES.
2. BUILDING A4 - AFFORDABLE HOUSING:
   LEVEL 1:
   2 UNITS x 50 SF PER UNIT =
   100 SF PER FLOOR OF PRIVATE OUTDOOR SPACE
   LEVELS 2-4:
   17 UNITS PER FLOOR x 50 SF PER UNIT =
   850 SF PER FLOOR x 3 =
   2,650 SF OF TOTAL PRIVATE OUTDOOR SPACE
3. AFFORDABLE UNITS WILL BE FOR LOWER-INCOME HOUSEHOLDS
4. 52 AFFORDABLE UNITS
   1 MARKET RATE MANAGER'S UNIT
   53 TOTAL UNITS
5. LONG TERM BICYCLE PARKING:
   REQUIRED SPACES = 27
   PROVIDED SPACES = 27
6. THE RESIDENT ACTIVITIES ROOM WILL BE USED FOR MEETING, SOCIAL GATHERINGS, SERVICES AND OTHER FUNCTIONS FOR THE RESIDENTS OF THE BUILDING.



3 A4 - ROOF
SCALE: 1/16" = 1'-0"

117TH PLACE

A4-A4.1
2



1 A4 - LEVEL 1
SCALE: 1/16" = 1'-0"

0 8' 16' 32' N

CMWC, LLC

Exhibit A

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LOS ANGELES, CALIFORNIA 90059

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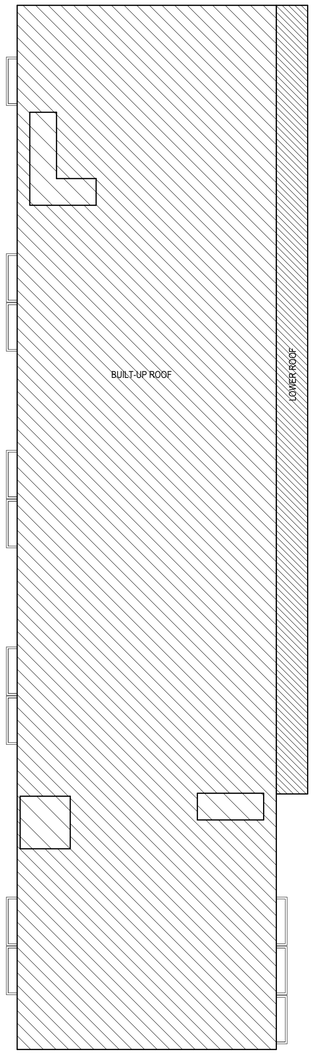
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5	SITE PLAN - RESUBMITTAL VI	11/05/2025

PLANS

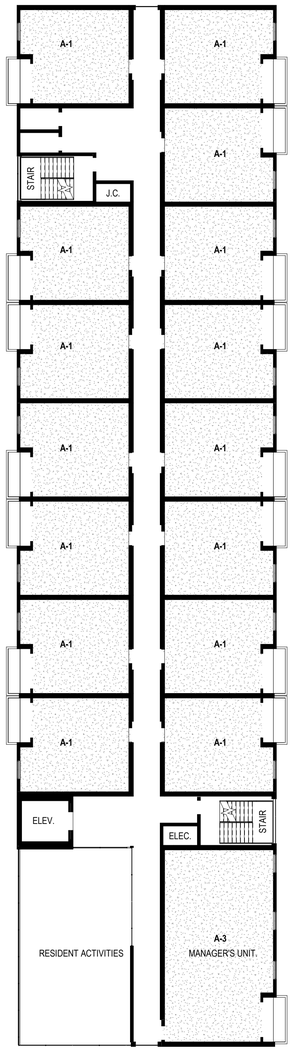
SCALE: As indicated

A4-A1.1

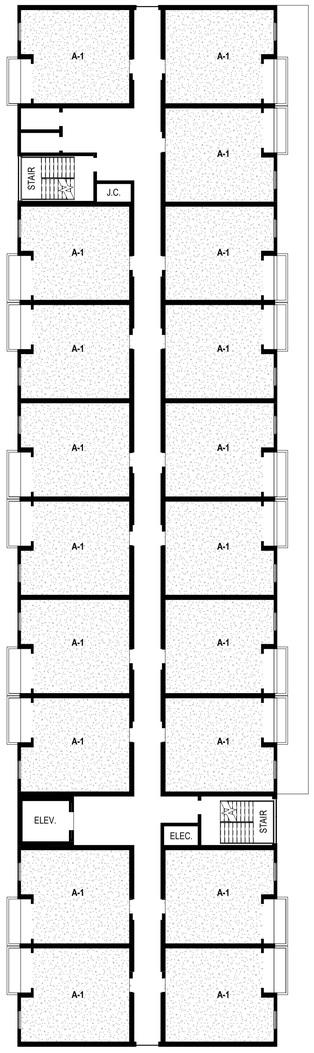
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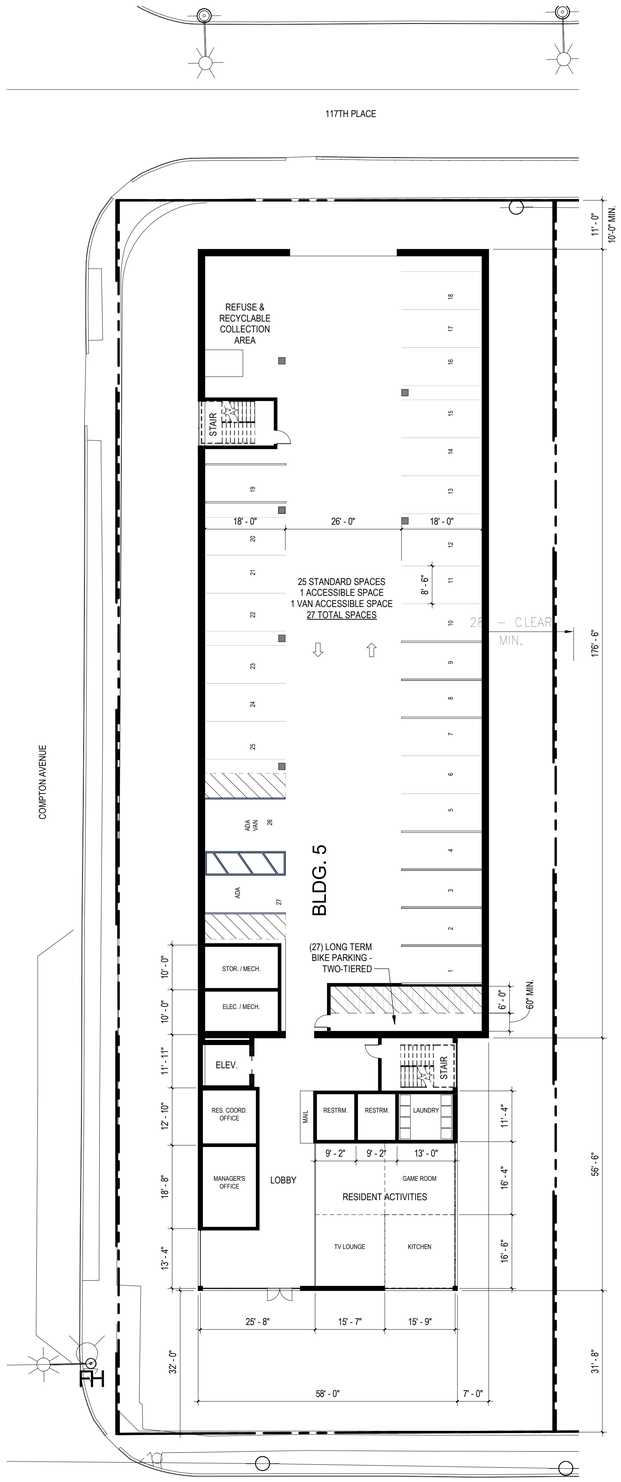
4 A5 - ROOF
SCALE: 1/16" = 1'-0"



3 A5 - LEVEL 4
SCALE: 1/16" = 1'-0"



2 A5 - LEVEL 2-3
SCALE: 1/16" = 1'-0"



1 A5 - LEVEL 1
SCALE: 1/16" = 1'-0"

0 8' 16' 32' N

NOTES

SECTION C-13:

A. ALL MECHANICAL EQUIPMENT SHALL BE SCREENED FROM PUBLIC VIEW. THIS INCLUDES ALL GROUND, WALL AND ROOF MOUNTED EQUIPMENT.

B. SCREENING ELEMENTS SHALL BE INTEGRAL PART OF THE BUILDING; NO SCREENING METHOD SHALL GIVE THE APPEARANCE OF BEING "TACKED ON"

NOTES

1. ALL DECKS / BALCONIES COMPLY WITH WILLOWBROOK T.O.D. REQUIREMENT OF 50 SF OF PRIVATE OUTDOOR SPACE PER DWELLING UNIT. - TABLE 3-5: DEVELOPMENT STANDARDS FOR MIXED USES.
2. BUILDING A5 - AFFORDABLE SENIOR HOUSING:
   LEVELS 2-3:
   19 UNITS PER FLOOR x 50 SF PER UNIT =
   950 SF PER FLOOR x 2 =
   1,900 SF OF PRIVATE OUTDOOR SPACE
   LEVEL 4:
   16 UNITS x 50 SF PER UNIT =
   800 SF OF PRIVATE OUTDOOR SPACE
   2,700 SF OF TOTAL PRIVATE OUTDOOR SPACE
3. AFFORDABLE UNITS WILL BE FOR LOWER-INCOME HOUSEHOLDS
4. 53 AFFORDABLE UNITS
   1 MARKET RATE MANAGER'S UNIT
   54 TOTAL UNITS
5. LONG TERM BICYCLE PARKING:
   REQUIRED SPACES = 27
   PROVIDED SPACES = 27
6. THE RESIDENT ACTIVITIES ROOM WILL BE USED FOR MEETING, SOCIAL GATHERINGS, SERVICES AND OTHER FUNCTIONS FOR THE RESIDENTS OF THE BUILDING.

CMWC, LLC

Exhibit A

21001.00

1667 EAST 18TH STREET
LOS ANGELES, CALIFORNIA 90059

Frederick Fisher and **Partners**
12248 Santa Monica Blvd.
Los Angeles, CA 90025

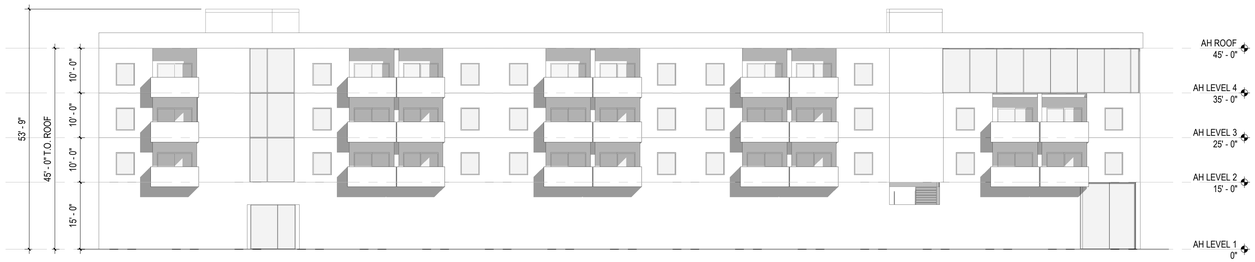
ISSUED FOR	DATE
1 SITE PLAN - RESUBMITTAL II	09/17/2024
2 SITE PLAN - RESUBMITTAL III	01/27/2025
3 SITE PLAN - RESUBMITTAL IV	03/27/2025
4 SITE PLAN - RESUBMITTAL V	07/01/2025
5 SITE PLAN - RESUBMITTAL VI	11/05/2025

PLANS

SCALE: As indicated

A5-A1.1

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5 A5 - WEST
SCALE: 1/16" = 1'-0"



4 A5 - SOUTH
SCALE: 1/16" = 1'-0"



3 A5 - EAST
SCALE: 1/16" = 1'-0"



2 A5 - NORTH
SCALE: 1/16" = 1'-0"

NOTES

MINIMUM TRANSPARENCY REQUIREMENTS. PER WILLOWBROOK TOD SPECIFIC PLAN CHAPTER 3 SECTION 3
A. WINDOWS AND OPENINGS FACING STREETS SHALL CONSTITUTE A MINIMUM OF 50 PERCENT OF STREET-LEVEL BUILDING FACADES, WITH THE EXCEPTION OF RESIDENTIAL UNITS WITH INDIVIDUAL ENTRIES, IN WHICH CASE WINDOWS AND OPENINGS FACING STREETS SHALL CONSTITUTE A MINIMUM OF 30 PERCENT OF STREET-LEVEL BUILDING FACADES.
B. ON UPPER-FLOORS, WINDOWS AND OPENINGS FACING STREETS SHALL CONSTITUTE A MINIMUM OF 40 PERCENT OF BUILDING FACADES FOR COMMERCIAL USES, AND 20 PERCENT OF BUILDING FACADES FOR RESIDENTIAL USES.

CMWC, LLC

Exhibit A

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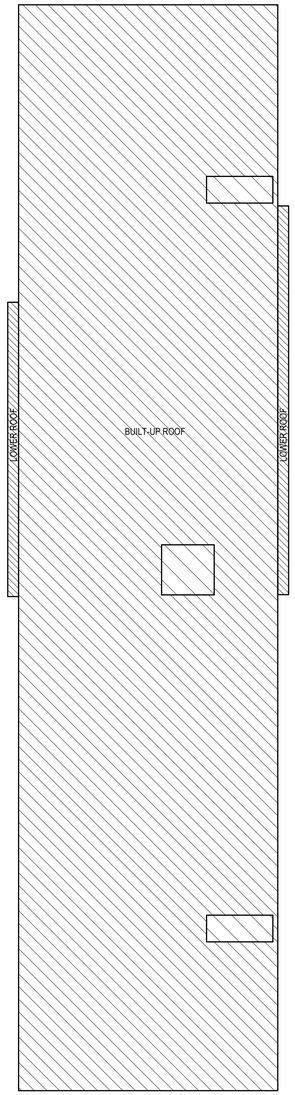
ISSUED FOR		DATE
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4	SITE PLAN - RESUBMITTAL V	07/01/2025
5	SITE PLAN - RESUBMITTAL VI	11/05/2025

BUILDING ELEVATIONS

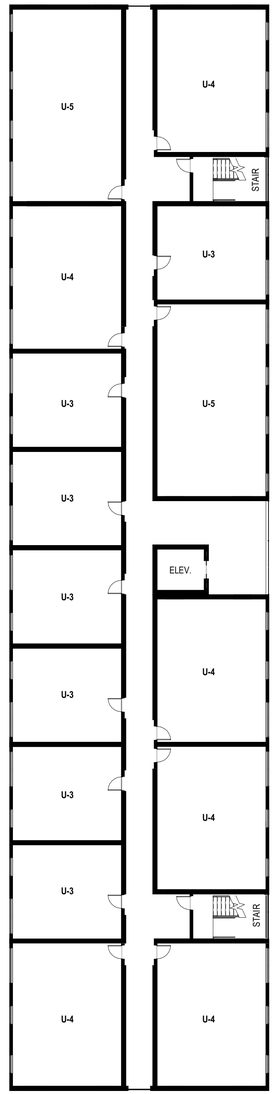
SCALE: As indicated

A5-A4.1

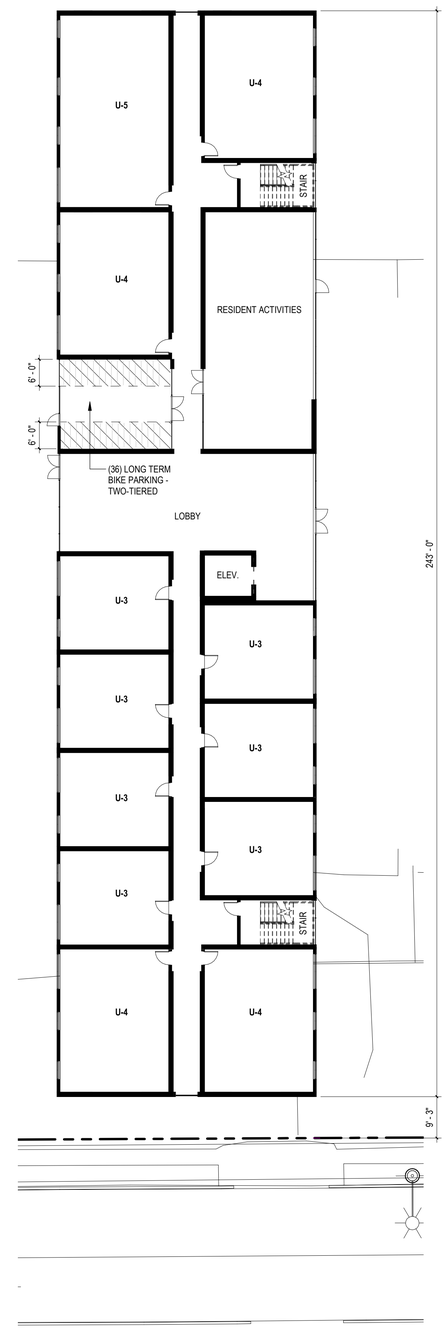
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3 U1 - ROOF
SCALE: 1/16" = 1'-0"



2 U1 - LEVEL 2-5
SCALE: 1/16" = 1'-0"



1 U1 - LEVEL 1
SCALE: 1/16" = 1'-0"

NOTES

SECTION C-13:

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B. SCREENING ELEMENTS SHALL BE INTEGRAL PART OF THE BUILDING; NO SCREENING METHOD SHALL GIVE THE APPEARANCE OF BEING "TACKED ON"

NOTES

1. REFERENCE LANDSCAPE PLANS FOR OPEN SPACE CALCULATIONS.
2. LONG TERM BICYCLE PARKING
   REQUIRED SPACES = 36
   PROVIDED SPACES = 36
3. THE RESIDENT ACTIVITIES ROOM WILL BE USED FOR MEETING, SOCIAL GATHERINGS, SERVICES AND OTHER FUNCTIONS FOR THE RESIDENTS OF THE BUILDING.
4. ONE OF THE DWELLING UNITS MAY BE USED AS A MANAGER'S UNIT

0 8' 16' 32'

N

CMWC, LLC

Exhibit A

21001.00

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LOS ANGELES, CALIFORNIA 90059

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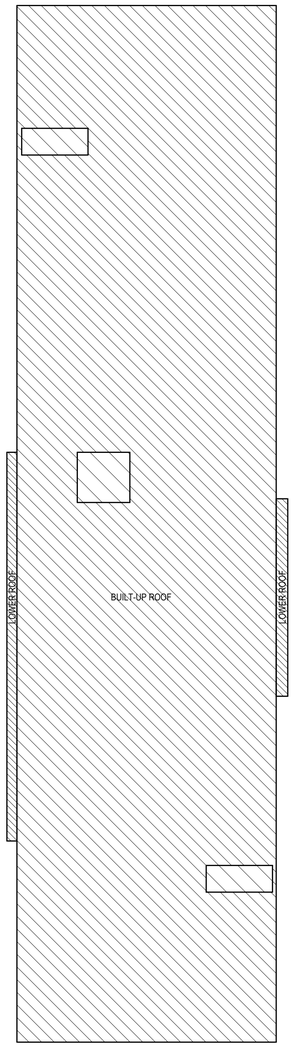
ISSUED FOR	DATE
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2 SITE PLAN - RESUBMITTAL III	01/27/2025
3 SITE PLAN - RESUBMITTAL IV	03/27/2025
4 SITE PLAN - RESUBMITTAL V	07/01/2025
5 SITE PLAN - RESUBMITTAL VI	11/05/2025

PLANS

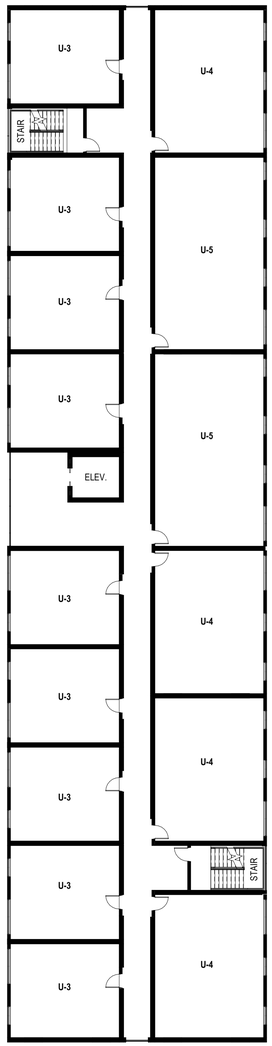
SCALE: As indicated

U1-A1.1

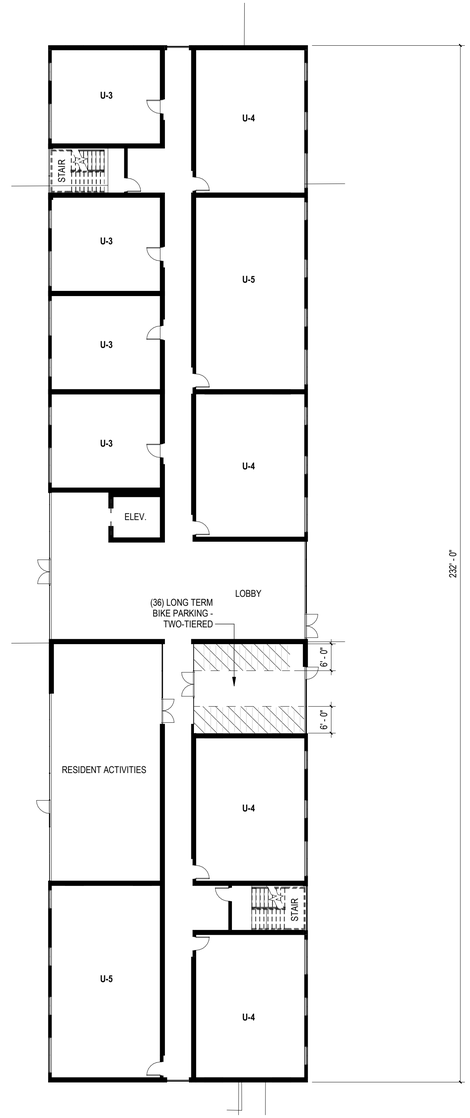
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3 U2 - ROOF
SCALE: 1/16" = 1'-0"



2 U2 - LEVEL 2-5
SCALE: 1/16" = 1'-0"



1 U2 - LEVEL 1
SCALE: 1/16" = 1'-0"

0 8' 16' 32'

N

NOTES

SECTION C-13:

A. ALL MECHANICAL EQUIPMENT SHALL BE SCREENED FROM PUBLIC VIEW. THIS INCLUDES ALL GROUND, WALL AND ROOF MOUNTED EQUIPMENT.
B. SCREENING ELEMENTS SHALL BE INTEGRAL PART OF THE BUILDING; NO SCREENING METHOD SHALL GIVE THE APPEARANCE OF BEING "TACKED ON"

NOTES

1. REFERENCE LANDSCAPE PLANS FOR OPEN SPACE CALCULATIONS.
2. LONG TERM BICYCLE PARKING:

   REQUIRED SPACES = 35
   PROVIDED SPACES = 35
3. THE RESIDENT ACTIVITIES ROOM WILL BE USED FOR MEETING, SOCIAL GATHERINGS, SERVICES AND OTHER FUNCTIONS FOR THE RESIDENTS OF THE BUILDING.
4. ONE OF THE DWELLING UNITS MAY BE USED AS A MANAGER'S UNIT

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Exhibit A

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LOS ANGELES, CALIFORNIA 90059

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12248 Santa Monica Blvd.
Los Angeles, CA 90025

ISSUED FOR	DATE
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4 SITE PLAN - RESUBMITTAL V	07/01/2025
5 SITE PLAN - RESUBMITTAL VI	11/05/2025

PLANS

SCALE: As indicated

U2-A1.1



5 U2 - WEST
SCALE: 1/16" = 1'-0"



4 U2 - SOUTH
SCALE: 1/16" = 1'-0"

3 U2 - EAST
SCALE: 1/16" = 1'-0"

2 U2 - NORTH
SCALE: 1/16" = 1'-0"

NOTES

MINIMUM TRANSPARENCY REQUIREMENTS. PER WILLOWBROOK TOD SPECIFIC PLAN CHAPTER 3 SECTION 3
A. WINDOWS AND OPENINGS FACING STREETS SHALL CONSTITUTE A MINIMUM OF 50 PERCENT OF STREET-LEVEL BUILDING FACADES, WITH THE EXCEPTION OF RESIDENTIAL UNITS WITH INDIVIDUAL ENTRIES, IN WHICH CASE WINDOWS AND OPENINGS FACING STREETS SHALL CONSTITUTE A MINIMUM OF 30 PERCENT OF STREET-LEVEL BUILDING FACADES.
B. ON UPPER-FLOORS, WINDOWS AND OPENINGS FACING STREETS SHALL CONSTITUTE A MINIMUM OF 40 PERCENT OF BUILDING FACADES FOR COMMERCIAL USES, AND 20 PERCENT OF BUILDING FACADES FOR RESIDENTIAL USES.

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CDU

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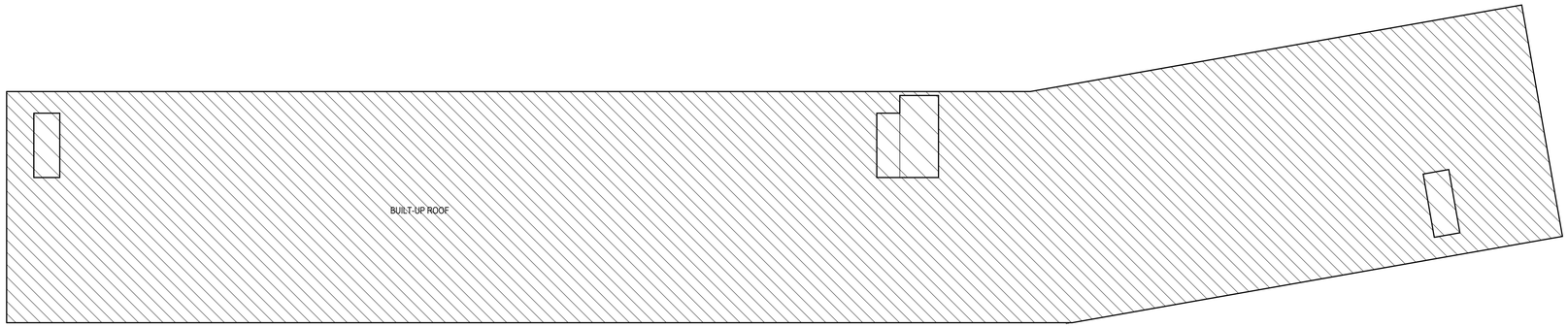
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5	SITE PLAN - RESUBMITTAL VI	11/05/2025

BUILDING ELEVATIONS

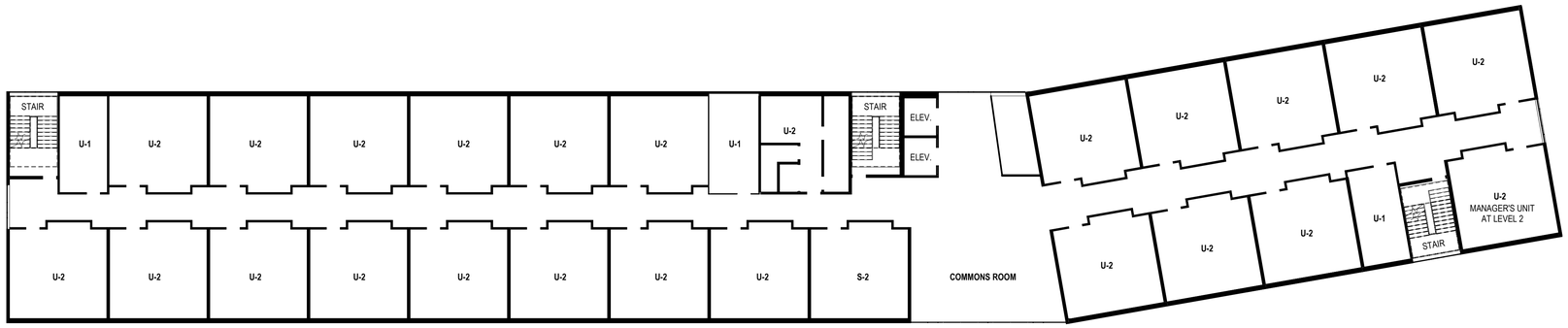
SCALE: As indicated

U2-A4.1

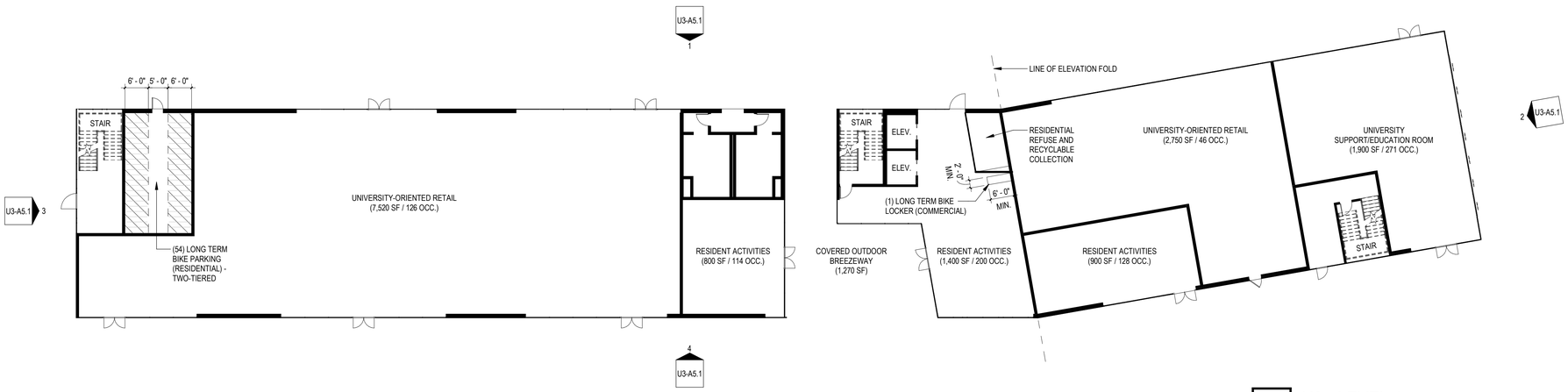
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3 U3 - ROOF
SCALE: 1/16" = 1'-0"



2 U3 - LEVEL 2-5
SCALE: 1/16" = 1'-0"



1 U3 - LEVEL 1
SCALE: 1/16" = 1'-0"

0 8' 16' 32' N

NOTES

SECTION C-13:
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NOTES

1. REFERENCE LANDSCAPE PLANS FOR OPEN SPACE CALCULATIONS.
2. LONG TERM BICYCLE PARKING:

   RESIDENTIAL COMPONENT
   REQUIRED SPACES = 54
   PROVIDED SPACES = 54

   COMMERCIAL COMPONENT
   REQUIRED SPACES = 1
   PROVIDED SPACES = 1

3. THE RESIDENT ACTIVITIES ROOM WILL BE USED FOR MEETING, SOCIAL GATHERINGS, SERVICES AND OTHER FUNCTIONS FOR THE RESIDENTS OF THE BUILDING.

CMWC, LLC

Exhibit A

21001.00

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5 SITE PLAN - RESUBMITTAL VI	11/05/2025

PLANS

SCALE: As indicated

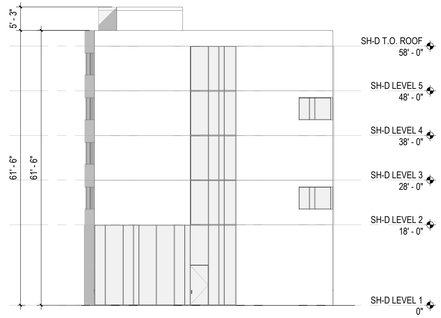
U3-A1.1

NOTES

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B. ON UPPER-FLOORS, WINDOWS AND OPENINGS FACING STREETS SHALL CONSTITUTE A MINIMUM OF 40 PERCENT OF BUILDING FACADES FOR COMMERCIAL USES, AND 20 PERCENT OF BUILDING FACADES FOR RESIDENTIAL USES.



4 U3 - SOUTH - 118TH ST.
SCALE: 1/16" = 1'-0"



3 U3 - WEST
SCALE: 1/16" = 1'-0"



2 U3 - EAST - COBB PLAZA
SCALE: 1/16" = 1'-0"



1 U3 - NORTH - SOCCER FIELD
SCALE: 1/16" = 1'-0"

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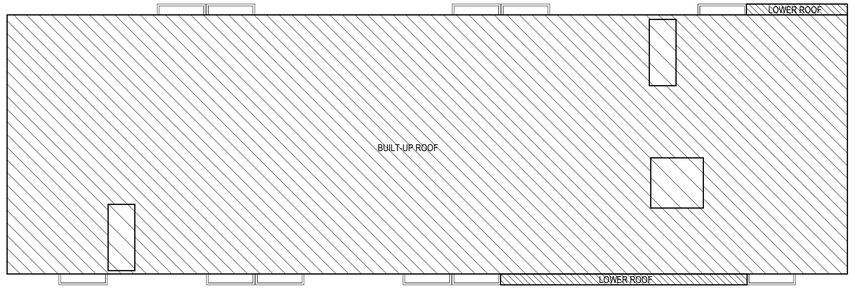
ISSUED FOR	DATE
4 SITE PLAN - RESUBMITTAL V	07/01/2025
5 SITE PLAN - RESUBMITTAL VI	11/05/2025

BUILDING ELEVATIONS

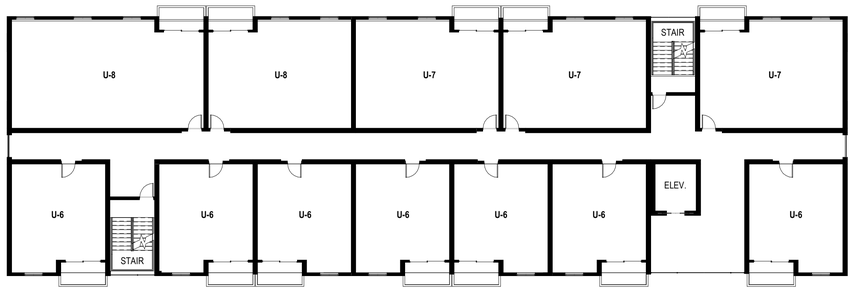
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U3-A5.1

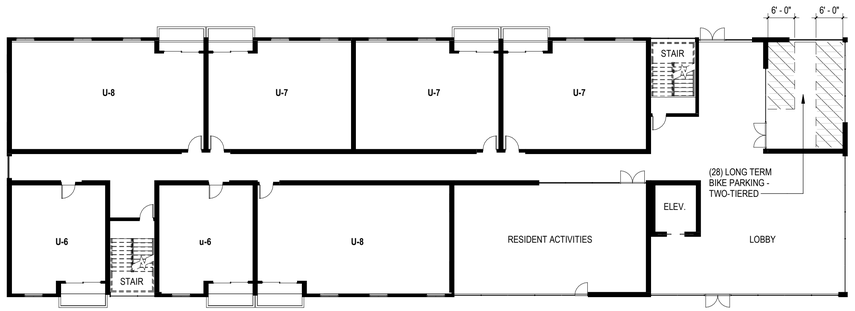
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3 U4 - ROOF
SCALE: 1/16" = 1'-0"



2 U4 - LEVEL 2-5
SCALE: 1/16" = 1'-0"



1 U4 - LEVEL 1
SCALE: 1/16" = 1'-0"

NOTES

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NOTES

1. REFERENCE LANDSCAPE PLANS FOR OPEN SPACE CALCULATIONS.
2. LONG TERM BICYCLE PARKING
   REQUIRED SPACES = 28
   PROVIDED SPACES = 28
3. THE RESIDENT ACTIVITIES ROOM WILL BE USED FOR MEETING, SOCIAL GATHERINGS, SERVICES AND OTHER FUNCTIONS FOR THE RESIDENTS OF THE BUILDING.
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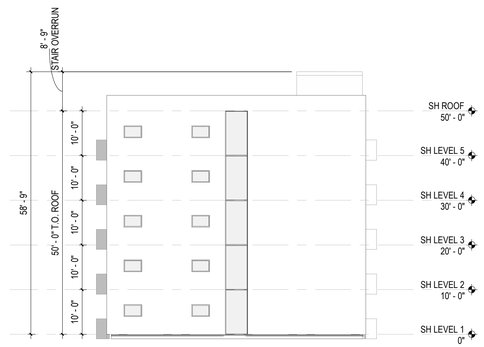
PLANS

SCALE: As indicated

U4-A1.1

0 8' 16' 32'

N



5 U4 - WEST
SCALE: 1/16" = 1'-0"



4 U4 - SOUTH
SCALE: 1/16" = 1'-0"

3 U4 - EAST
SCALE: 1/16" = 1'-0"

2 U4 - NORTH
SCALE: 1/16" = 1'-0"

NOTES

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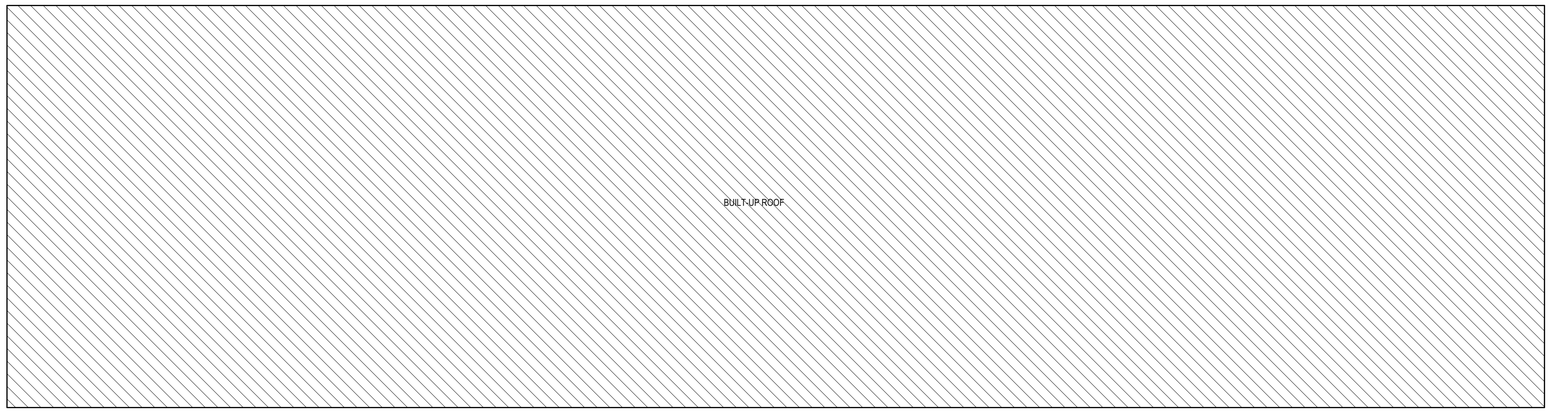
ISSUED FOR	DATE
4 SITE PLAN - RESUBMITTAL V	07/01/2025
5 SITE PLAN - RESUBMITTAL VI	11/05/2025

BUILDING ELEVATIONS

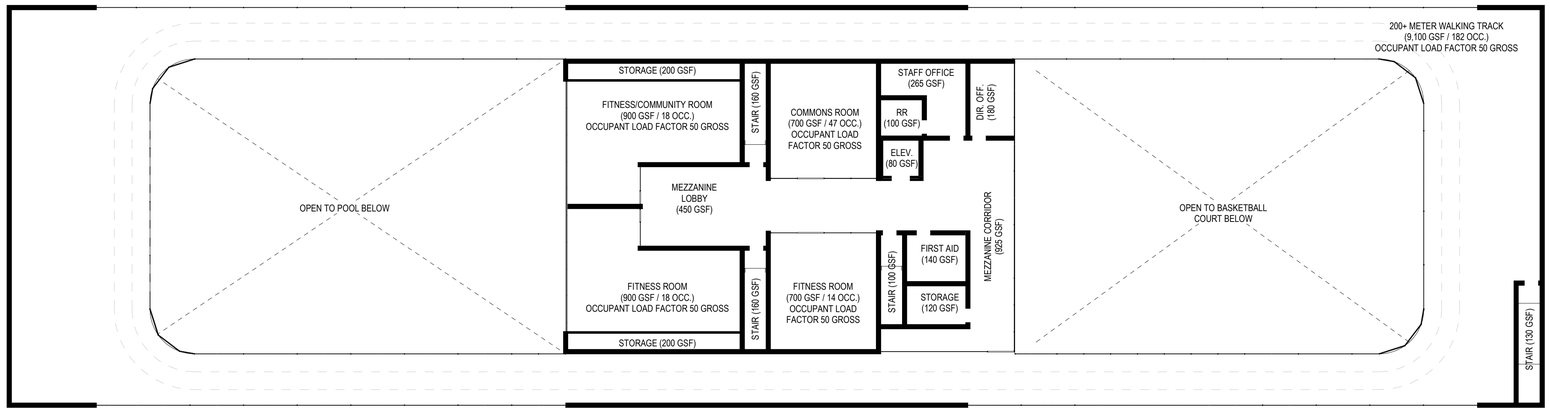
SCALE: As indicated

U4-A4.1

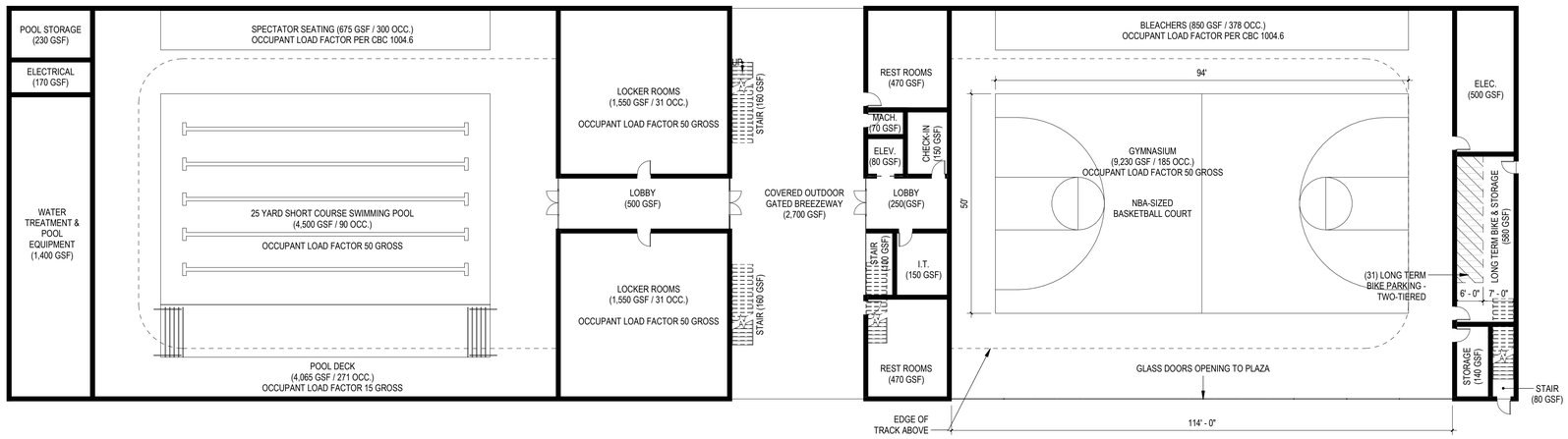
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3 U6 - ROOF
SCALE: 1/16" = 1'-0"



2 U6 - LEVEL 2
SCALE: 1/16" = 1'-0"



1 U6 - LEVEL 1
SCALE: 1/16" = 1'-0"

0 8' 16' 32' N

NOTES

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A. ALL MECHANICAL EQUIPMENT SHALL BE SCREENED FROM PUBLIC VIEW. THIS INCLUDES ALL GROUND, WALL AND ROOF MOUNTED EQUIPMENT.
B. SCREENING ELEMENTS SHALL BE INTEGRAL PART OF THE BUILDING; NO SCREENING METHOD SHALL GIVE THE APPEARANCE OF BEING "TACKED ON"

1. OCCUPANCY LOAD:
   -REF. PLANS FOR OCCUPANCY LOAD PER OCCUPIED SPACES
   -TOTAL OCCUPANCY: 1,565 OCC.

   -OCCUPANT LOAD FACTOR BASED ON CBC TABLE 1004.5 & SECTION 1004.6

2. LONG TERM BICYCLE PARKING
   REQUIRED SPACES = 31
   PROVIDED SPACES = 31

CMWC, LLC

Exhibit A

21001.00

1667 EAST 18TH STREET
LOS ANGELES, CALIFORNIA 90059

Frederick Fisher and Partners
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Los Angeles, CA 90025

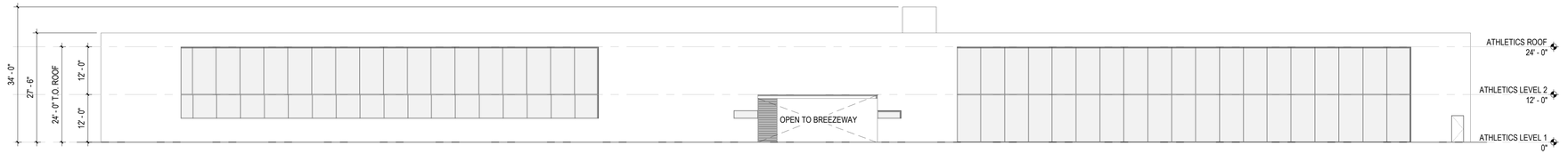
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2 SITE PLAN - RESUBMITTAL III	01/27/2025
3 SITE PLAN - RESUBMITTAL IV	03/27/2025
4 SITE PLAN - RESUBMITTAL V	07/01/2025
5 SITE PLAN - RESUBMITTAL VI	11/05/2025

PLANS

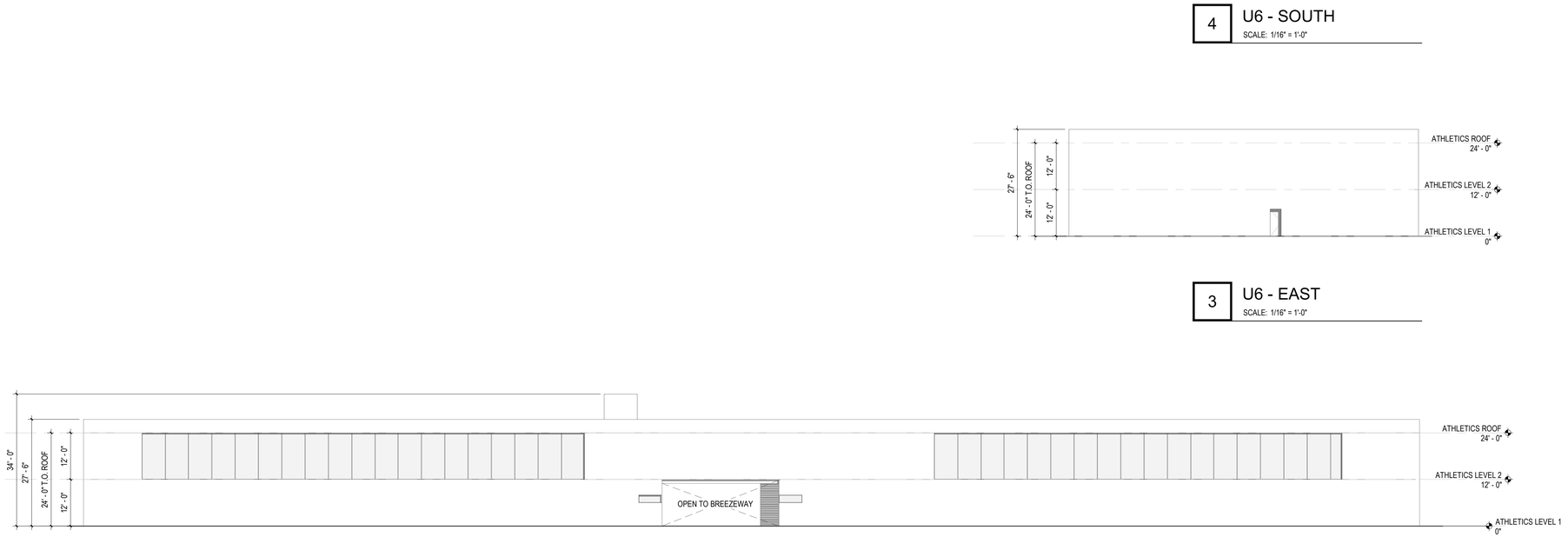
SCALE: As indicated

U6-A1.1

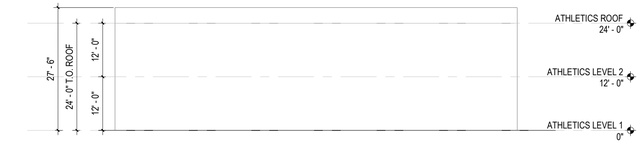
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5 U6 - WEST
SCALE: 1/16" = 1'-0"



4 U6 - SOUTH
SCALE: 1/16" = 1'-0"



3 U6 - EAST
SCALE: 1/16" = 1'-0"

2 U6 - NORTH
SCALE: 1/16" = 1'-0"

NOTES

MINIMUM TRANSPARENCY REQUIREMENTS. PER WILLOWBROOK TOD SPECIFIC PLAN CHAPTER 3 SECTION 3
A. WINDOWS AND OPENINGS FACING STREETS SHALL CONSTITUTE A MINIMUM OF 50 PERCENT OF STREET-LEVEL BUILDING FACADES, WITH THE EXCEPTION OF RESIDENTIAL UNITS WITH INDIVIDUAL ENTRIES, IN WHICH CASE WINDOWS AND OPENINGS FACING STREETS SHALL CONSTITUTE A MINIMUM OF 30 PERCENT OF STREET-LEVEL BUILDING FACADES.
B. ON UPPER-FLOORS, WINDOWS AND OPENINGS FACING STREETS SHALL CONSTITUTE A MINIMUM OF 40 PERCENT OF BUILDING FACADES FOR COMMERCIAL USES, AND 20 PERCENT OF BUILDING FACADES FOR RESIDENTIAL USES.

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Exhibit A

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CDU
CENTURY

ISSUED FOR		DATE
4	SITE PLAN - RESUBMITTAL V	07/01/2025
5	SITE PLAN - RESUBMITTAL VI	11/05/2025

BUILDING ELEVATIONS

SCALE: As indicated

U6-A4.1

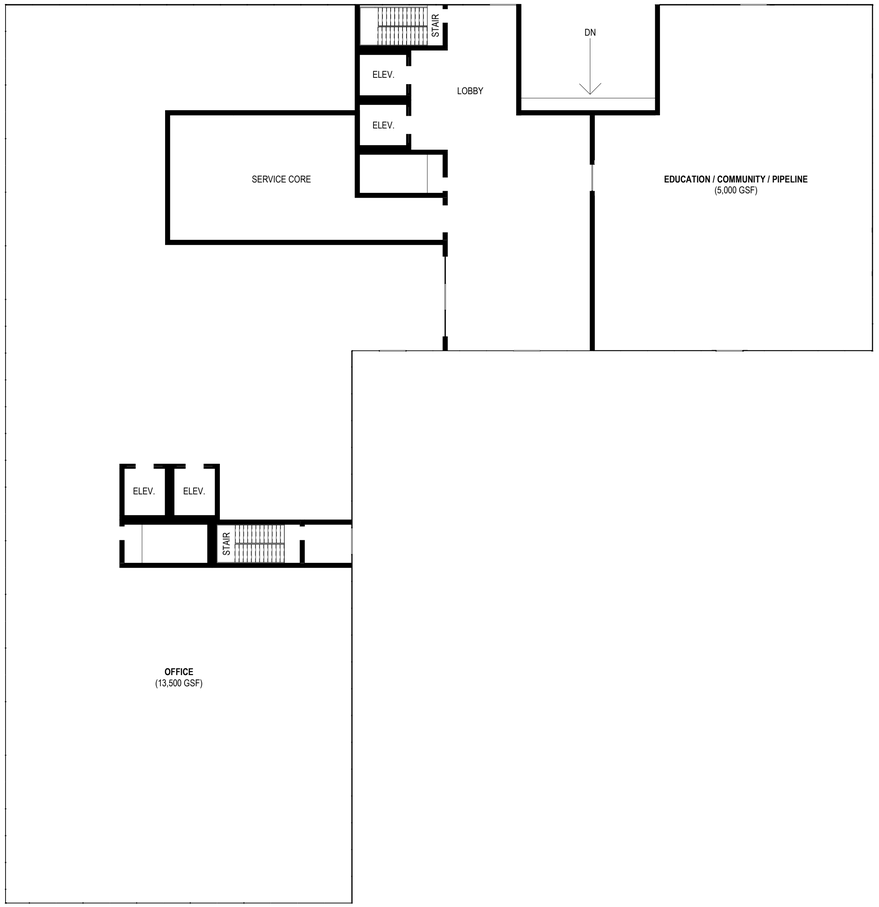
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NOTES

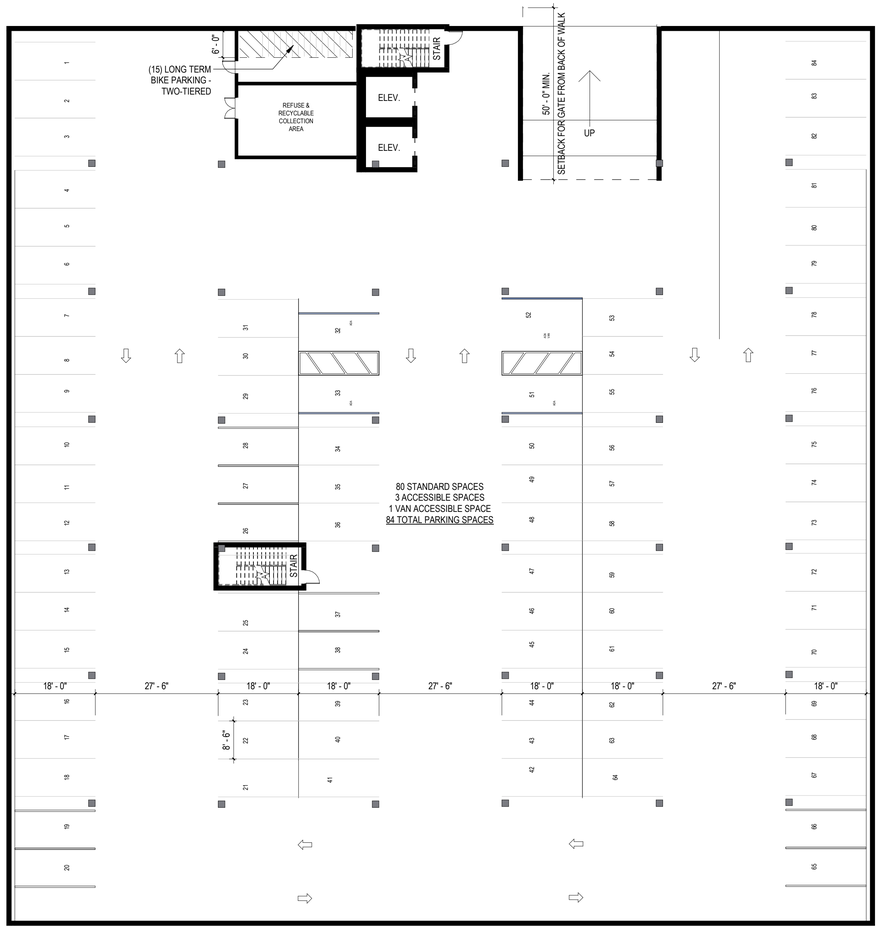
SECTION C-13:

A. ALL MECHANICAL EQUIPMENT SHALL BE SCREENED FROM PUBLIC VIEW. THIS INCLUDES ALL GROUND, WALL AND ROOF MOUNTED EQUIPMENT.
B. SCREENING ELEMENTS SHALL BE INTEGRAL PART OF THE BUILDING; NO SCREENING METHOD SHALL GIVE THE APPEARANCE OF BEING "TACKED ON"

1. LONG TERM BICYCLE PARKING
   REQUIRED SPACES = 15
   PROVIDED SPACES = 15



2 U7 - LEVEL 1
SCALE: 1/16" = 1'-0"



1 U7 - PARKING LEVEL
SCALE: 1/16" = 1'-0"

0 8' 16' 32' N

CMWC, LLC

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4 SITE PLAN - RESUBMITTAL V	07/01/2025
5 SITE PLAN - RESUBMITTAL VI	11/05/2025

PLANS

SCALE: As indicated

U7-A1.1

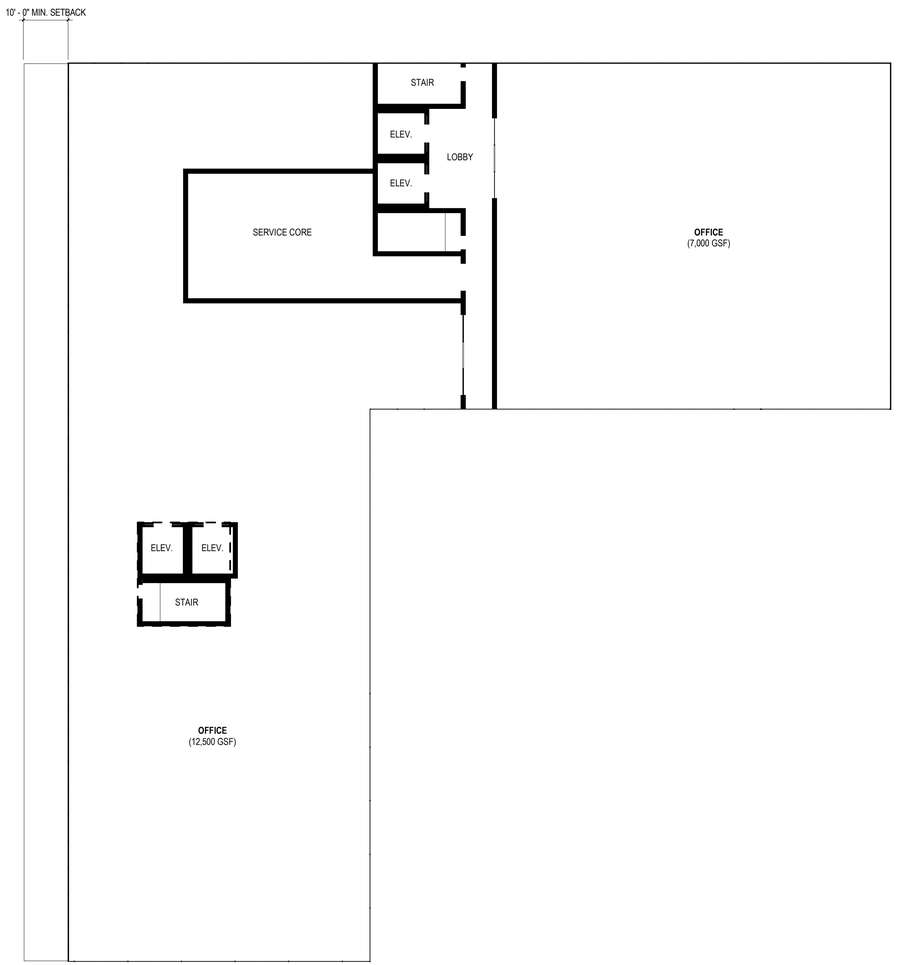
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SECTION C-13:

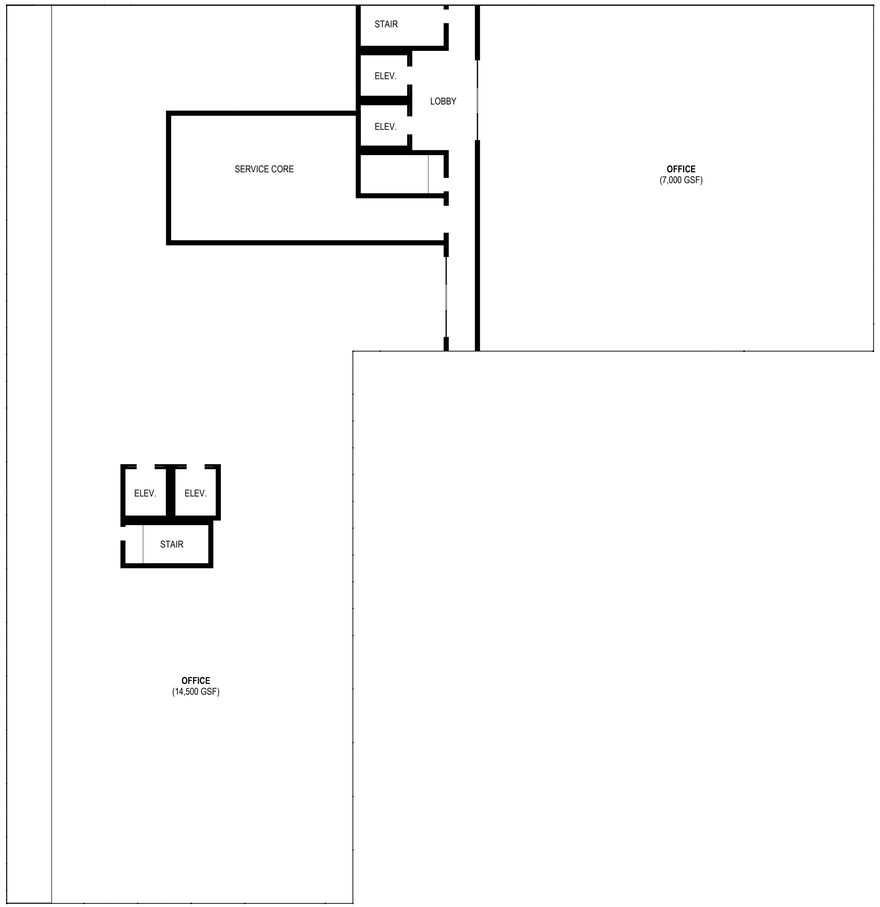
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1 U7 - LEVELS 4-5

SCALE: 1/16" = 1'-0"



2 U7 - LEVELS 2-3

SCALE: 1/16" = 1'-0"

0 8' 16' 32'

N

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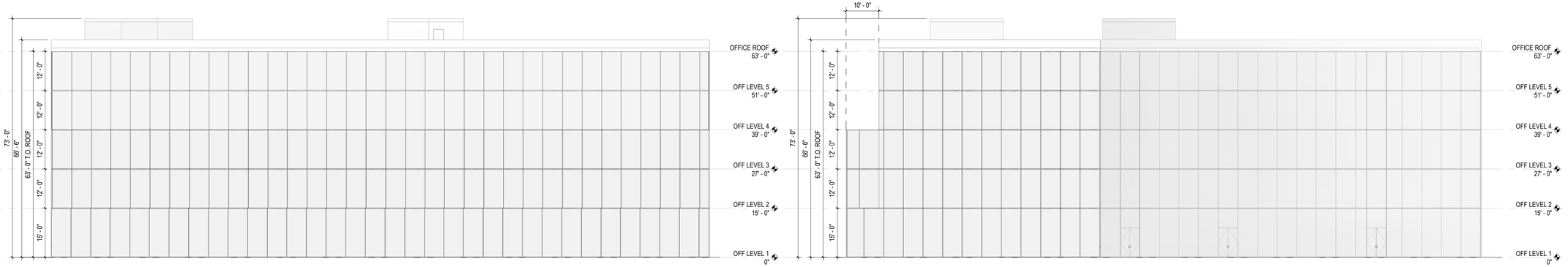
CENTURY

	ISSUED FOR	DATE
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5	SITE PLAN - RESUBMITTAL VI	11/05/2025

PLANS

SCALE: As indicated

U7-A1.2

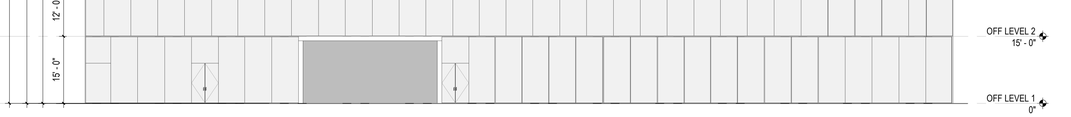


5 U7 - WEST
SCALE: 1/16" = 1'-0"

4 U7 - SOUTH
SCALE: 1/16" = 1'-0"



3 U7 - EAST
SCALE: 1/16" = 1'-0"



2 U7 - NORTH
SCALE: 1/16" = 1'-0"

NOTES

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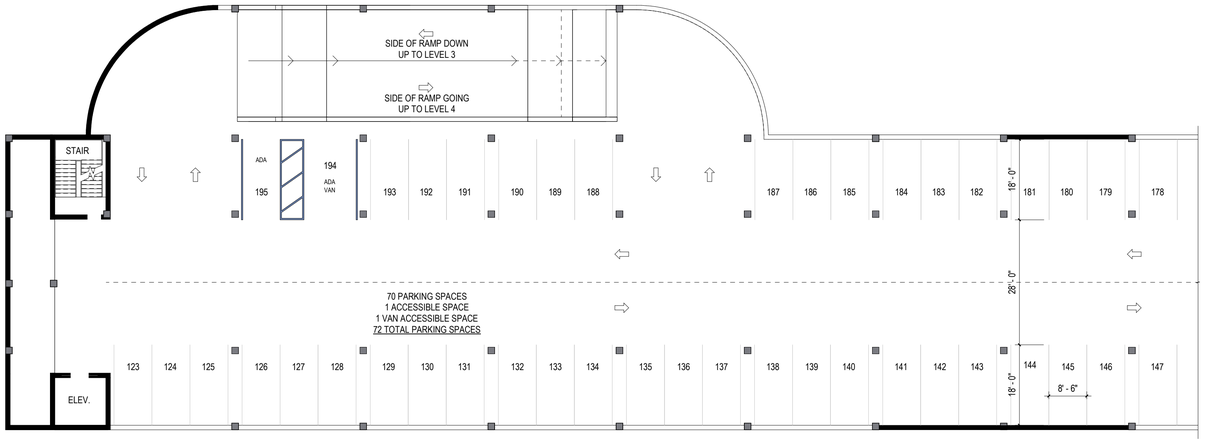
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5 SITE PLAN - RESUBMITTAL VI	11/05/2025

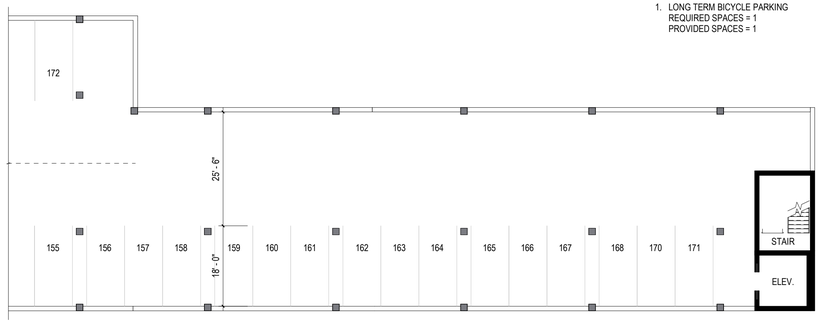
BUILDING ELEVATIONS

SCALE: As indicated

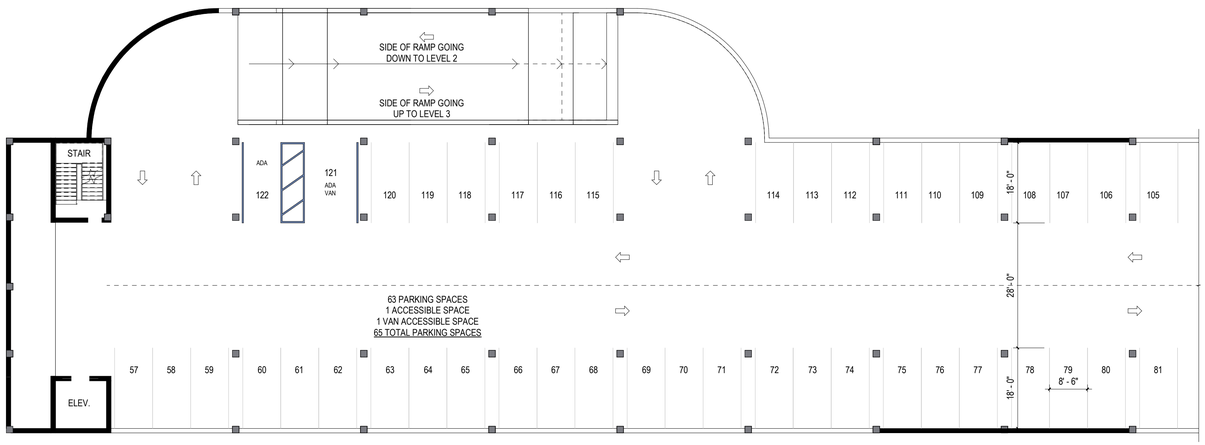
U7-A4.1

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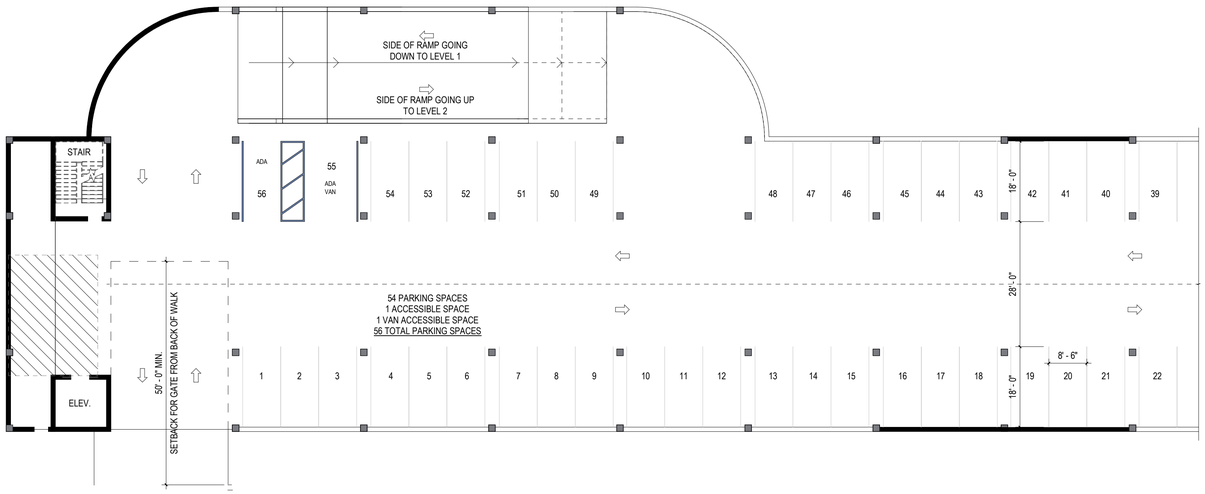


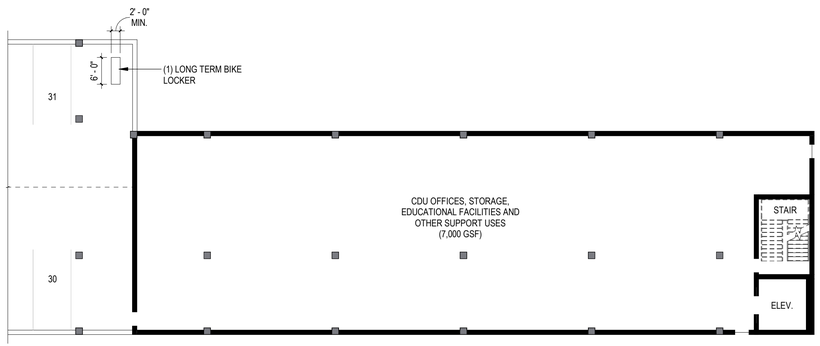
3 U8 - LEVEL 3
SCALE: 1/16" = 1'-0"





2 U8 - LEVEL 2
SCALE: 1/16" = 1'-0"





1 U8 - LEVEL 1
SCALE: 1/16" = 1'-0"

0 8' 16' 32'

N

NOTES

SECTION C-13:
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1. LONG TERM BICYCLE PARKING
REQUIRED SPACES = 1
PROVIDED SPACES = 1

CMWC, LLC

Exhibit A

21001.00

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FACILITIES YARD

PLANS

SCALE: As indicated

U8-A1.1

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PARKING ASSESSMENT

Charles R. Drew University Wellness and Education Campus (CMWC)
Parking Matrix

Use	SF or Qty		Minimum Parking Required Code Required	Minimum Parking Required Spaces Required	Maximum Parking Required Code Required	Maximum Parking Required Spaces Required	Spaces Provided
Affordable Housing							
Building A1	47	du	0.5/du	23.5	0.5/du	23.5	24
Building A2	47	du	0.5/du	23.5	0.5/du	23.5	24
Building A3	53	du	0.5/du	26.5	0.5/du	26.5	29
Building A4	53	du	0.5/du	26.5	0.5/du	26.5	29
Building A5	54	du	0.5/du	27	0.5/du	27	27
Affordable Housing Total	**254**	**du**		**127**		**127**	**133**
University Housing							
Building U1 - Apts							
1 Bedroom	35	du	0.9/du	31.5	1.5/du	52.5	
2 & 3 Bedroom	37	du	1.2/du	44.4	2.0/du	74	
Guest			0.15/du	10.5	0.25/du	17.5	
TOTAL	72	du		86.4		144	87
Building U2 - Apts							
1 Bedroom	40	du	0.9/du	36	1.5/du	60	
2 & 3 Bedroom	30	du	1.2/du	36	2.0/du	60	
Guest			0.15/du	10.2	0.25/du	17	
TOTAL	70	du		82.2		137	83
Building U3 - Apts							
1 Bedroom	12	du	0.9/du	10.8	1.5/du	18	
2 Bedroom	96	du	1.2/du	115.2	2.0/du	192	
Guest			0.15/du	14.4	0.25/du	24	
TOTAL	108	du		140.4		234	141
Faculty/Staff Housing							
Building U4 - Apts							
1 Bedroom	30	du	0.9/du	27	1.5/du	45	
2 & 3 Bedroom	25	du	1.2/du	30	2.0/du	50	
Guest			0.15/du	8.25	0.25/du	13.75	
TOTAL	55	du		65.25		108.75	66
University Housing Total	**305**	**du**		**374.25**		**623.75**	**377**
University Support Facilities							
Community Space (Bldg. U3)	333	occ	1/3 occ * 40%	44.40	1/3 occ	111.00	25
Commercial/Retail (Bldg. U3)	10,270	sf	1/250sf * 40%	16.4	1/250sf	41.08	16
Athletic Facilities (Bldg. U6)	1565	occ	1/3 occ * 40%	208.7	1/3 occ	521.7	209
Professional Office (Bldg. U7)	116,000	sf	1/400 sf * 40%	116	1/400 sf	290	84
Facilities/Services (Bldg. U8)	11,500	sf	1/400 sf * 40%	11.5	1/400 sf	28.75	10
University Support Total				**397.0**		**992.5**	**344.0**
University Facilities Total				**771.2**		**1616.2**	**721.0**
CMWC TOTAL				**898.2**		**1743.2**	**854.0**

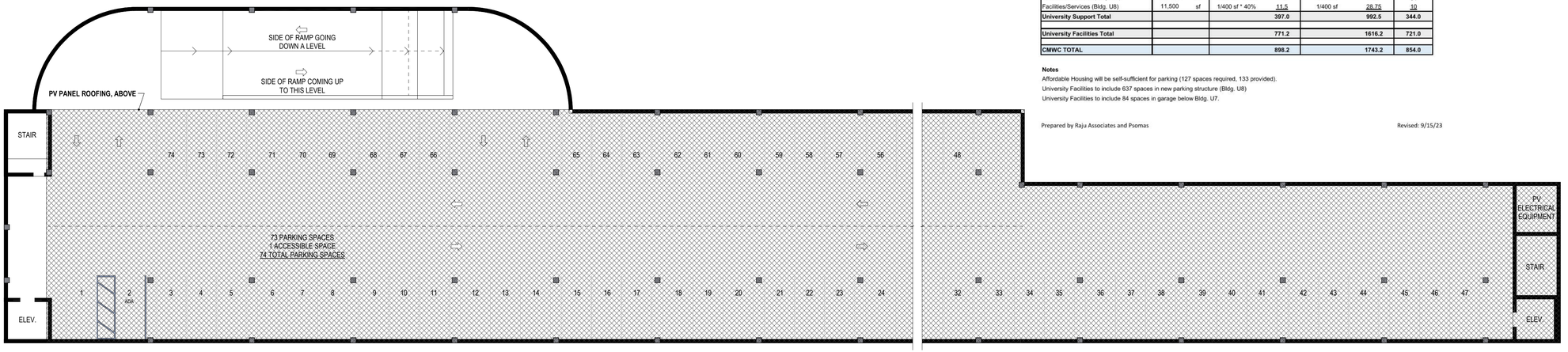
Notes
Affordable Housing will be self-sufficient for parking (127 spaces required, 133 provided).
University Facilities to include 637 spaces in new parking structure (Bldg. U8)
University Facilities to include 84 spaces in garage below Bldg. U7.

Prepared by Raju Associates and Psomas

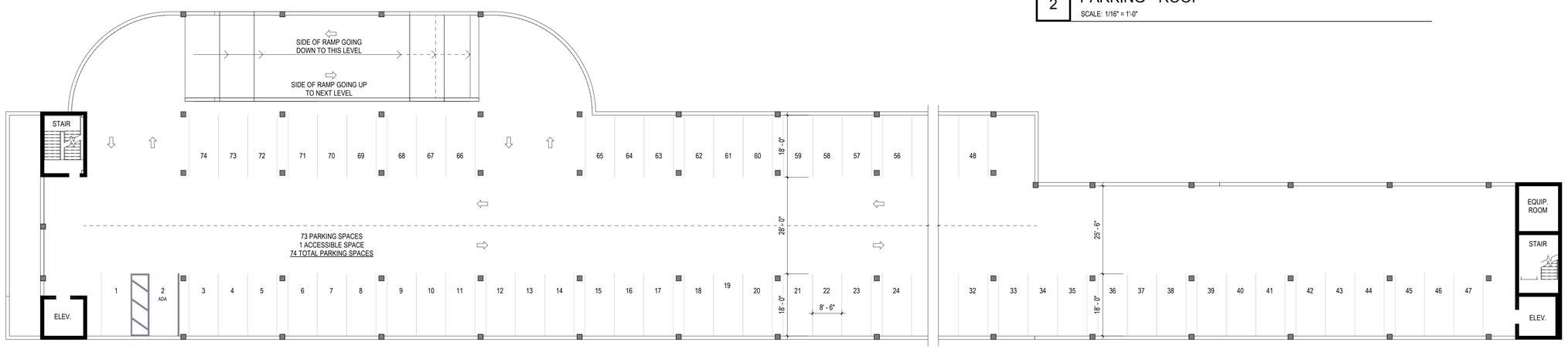
Revised: 9/15/23

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2 PARKING - ROOF
SCALE: 1/16" = 1'-0"



1 U8 - LEVELS 4-8
SCALE: 1/16" = 1'-0"

0 8' 16' 32'

N

CMWC, LLC

Exhibit A

21001.00

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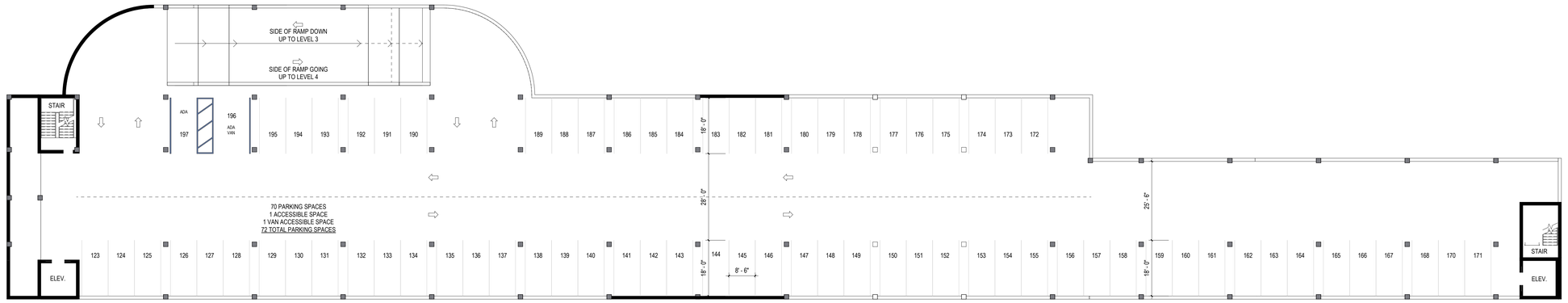
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PLANS

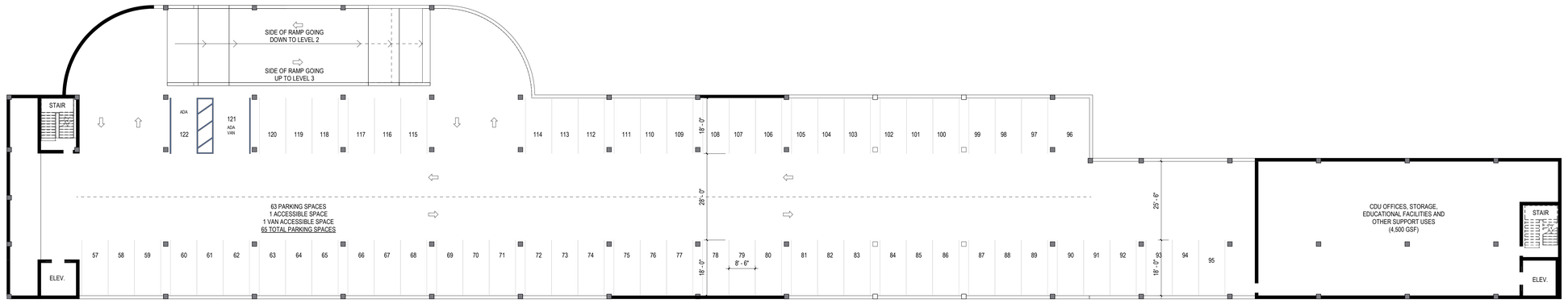
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U8-A1.2

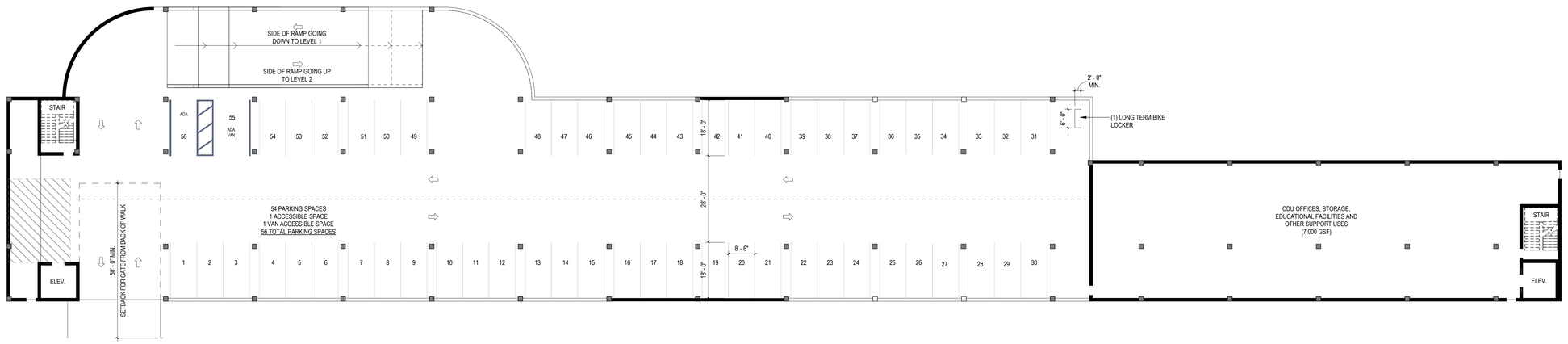
Exhibit A



3 U8 - LEVEL 3
SCALE: 1/16" = 1'-0"



2 U8 - LEVEL 2
SCALE: 1/16" = 1'-0"



1 U8 - LEVEL 1
SCALE: 1/16" = 1'-0"

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PLANS

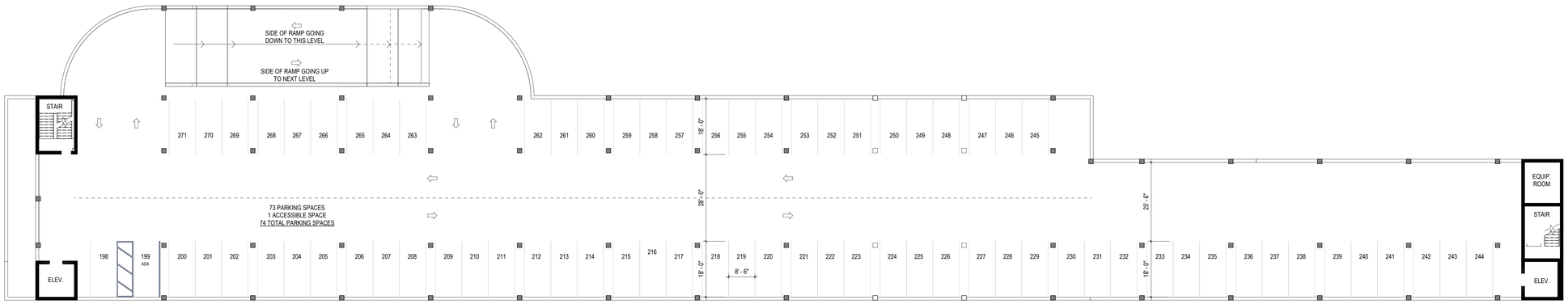
SCALE: 1/16" = 1'-0"

U8-A1.3

Exhibit A



2 PARKING - ROOF FULL
SCALE: 1/16" = 1'-0"



1 U8 - LEVELS 4-8
SCALE: 1/16" = 1'-0"

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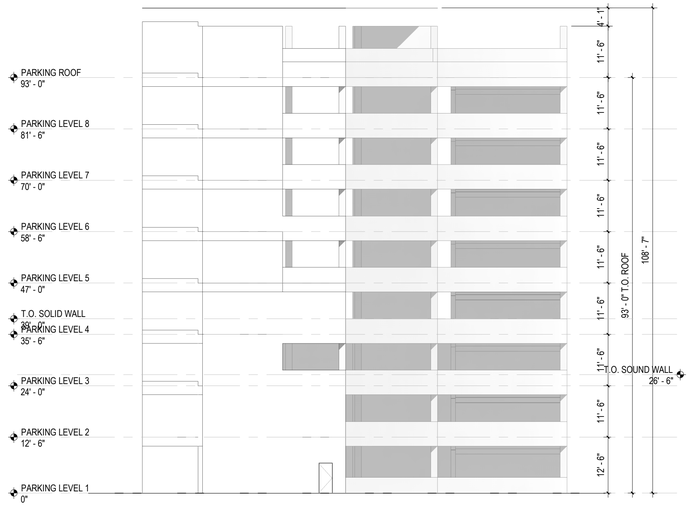
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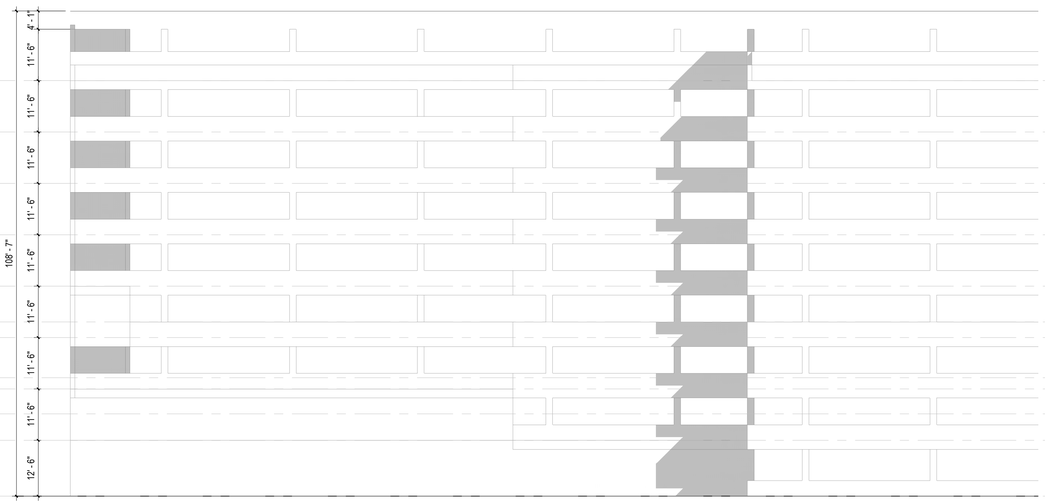
SCALE: 1/16" = 1'-0"

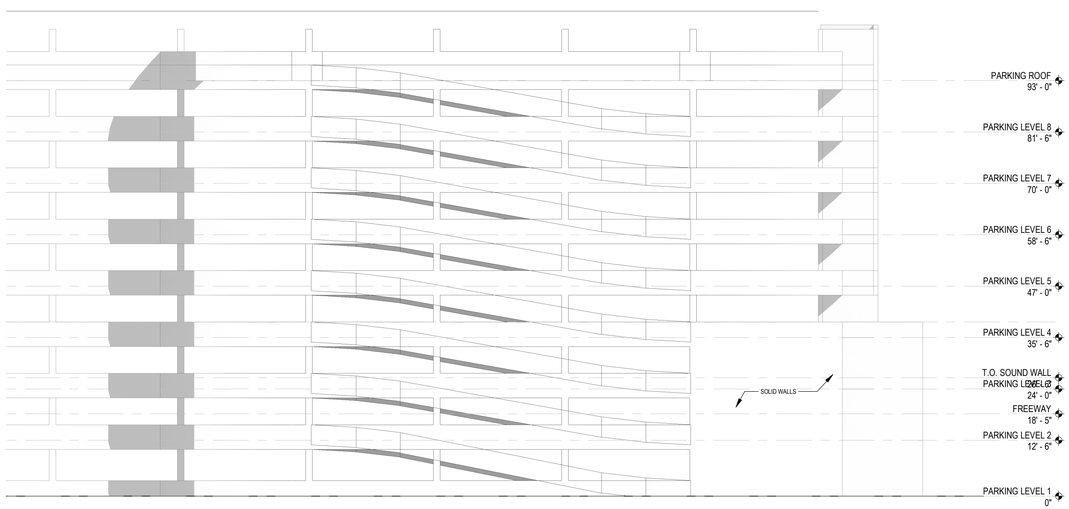
U8-A1.4

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2 U8 - EAST
SCALE: 1/16" = 1'-0"





1 U8 - NORTH
SCALE: 1/16" = 1'-0"

CMWC, LLC

Exhibit A

21001.00

1667 EAST 18TH STREET
LOS ANGELES, CALIFORNIA 90059

Frederick Fisher and Partners
12248 Santa Monica Blvd.
Los Angeles, CA 90025

ISSUED FOR	DATE
4 SITE PLAN - RESUBMITTAL V	07/01/2025
5 SITE PLAN - RESUBMITTAL VI	11/05/2025

BUILDING ELEVATIONS

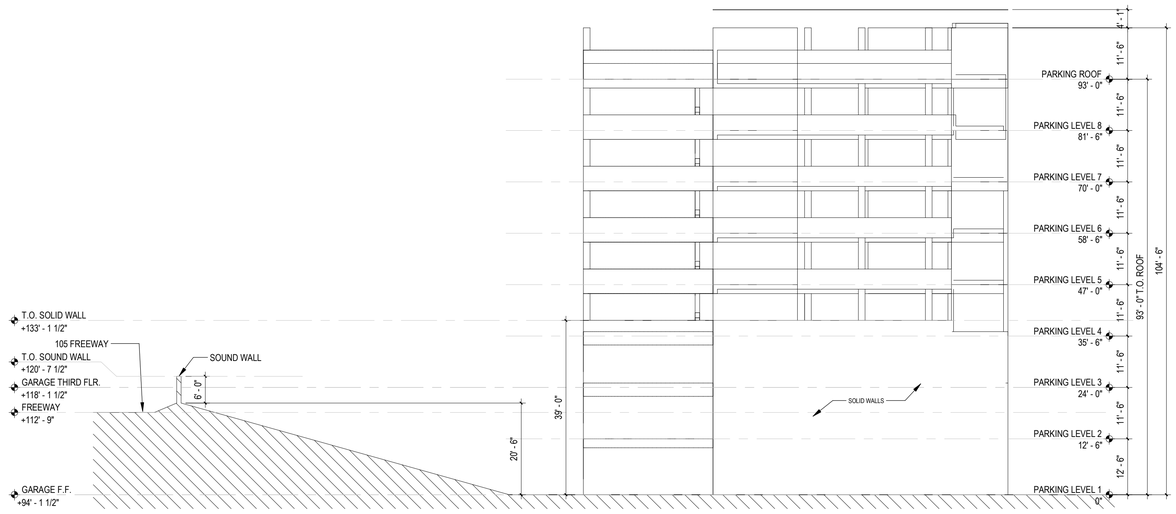
SCALE: 1/16" = 1'-0"

U8-A5.1

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NOTES

MINIMUM TRANSPARENCY REQUIREMENTS. PER WILLOWBROOK TOD SPECIFIC PLAN CHAPTER 3 SECTION 3
A. WINDOWS AND OPENINGS FACING STREETS SHALL CONSTITUTE A MINIMUM OF 50 PERCENT OF STREET-LEVEL BUILDING FACADES, WITH THE EXCEPTION OF RESIDENTIAL UNITS WITH INDIVIDUAL ENTRIES, IN WHICH CASE WINDOWS AND OPENINGS FACING STREETS SHALL CONSTITUTE A MINIMUM OF 30 PERCENT OF STREET-LEVEL BUILDING FACADES.
B. ON UPPER-FLOORS, WINDOWS AND OPENINGS FACING STREETS SHALL CONSTITUTE A MINIMUM OF 40 PERCENT OF BUILDING FACADES FOR COMMERCIAL USES, AND 20 PERCENT OF BUILDING FACADES FOR RESIDENTIAL USES.



2 U8 - WEST
SCALE: 1/16" = 1'-0"



1 U8 - SOUTH
SCALE: 1/16" = 1'-0"

CMWC, LLC

Exhibit A

21001.00

1667 EAST 18TH STREET
LOS ANGELES, CALIFORNIA 90059

Frederick Fisher and Partners
12248 Santa Monica Blvd.
Los Angeles, CA 90025

CHARLES R. DREW UNIVERSITY OF MEDICINE AND SCIENCE — CDU

CENTURY

ISSUED FOR	DATE
4 SITE PLAN - RESUBMITTAL V	07/01/2025
5 SITE PLAN - RESUBMITTAL VI	11/05/2025

BUILDING ELEVATIONS

SCALE: As indicated

U8-A5.2

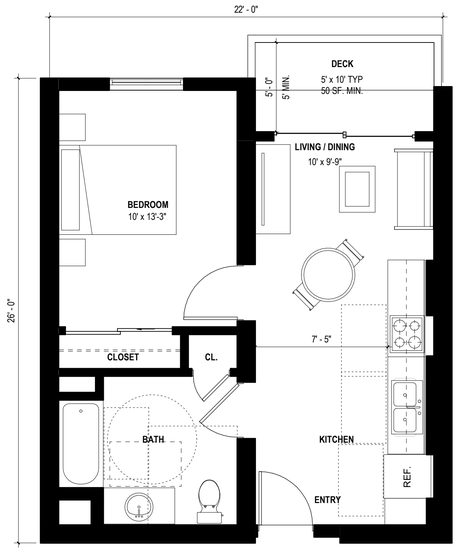
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UNIT TABLE KEY

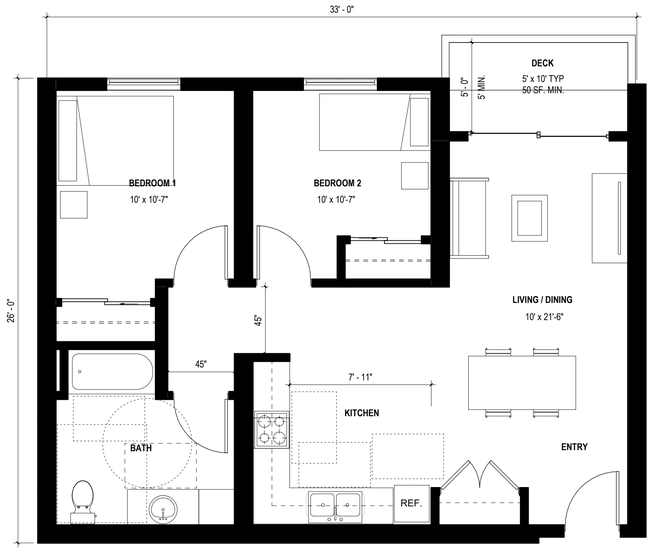
- UNITS U-1 & U-2 IN BLDG. U3
- UNITS U-3, U-4, U-5, U-6, U-7, & U-8 IN BLDGS. U1, U2, & U4
- UNITS A-1, A-2 & A-3 IN BLDGS. A-1, A-2, A-3, A-4, & A-5

NOTES

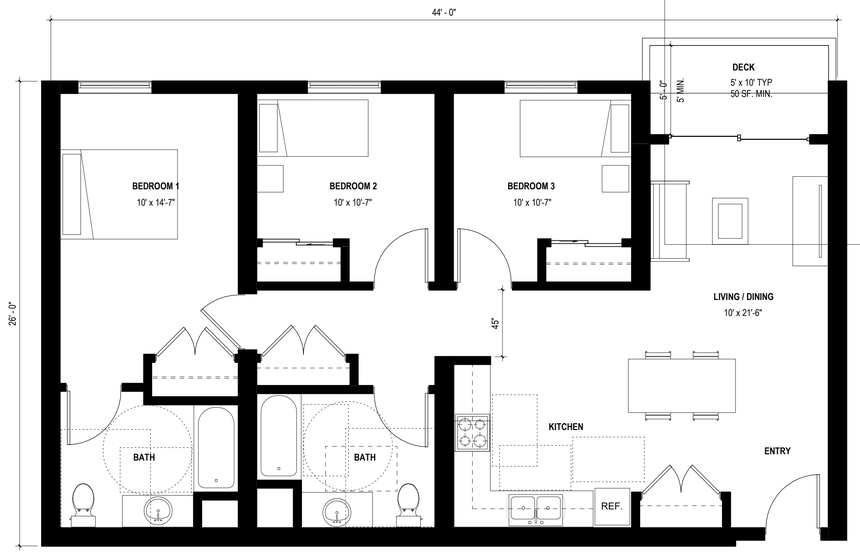
1. ALL DECKS / BALCONIES COMPLY WITH WILLOWBROOK T.O.D. REQUIREMENT OF 50 SF OF PRIVATE OUTDOOR SPACE PER DWELLING UNIT. - TABLE 3-5: DEVELOPMENT STANDARDS FOR MIXED USES.



UNIT U-6
1 BEDROOM / 1 BATH
539 SF

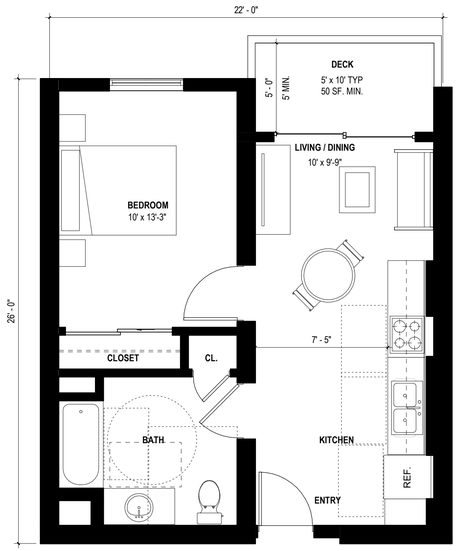


UNIT U-7
2 BEDROOM / 1 BATH
818 SF

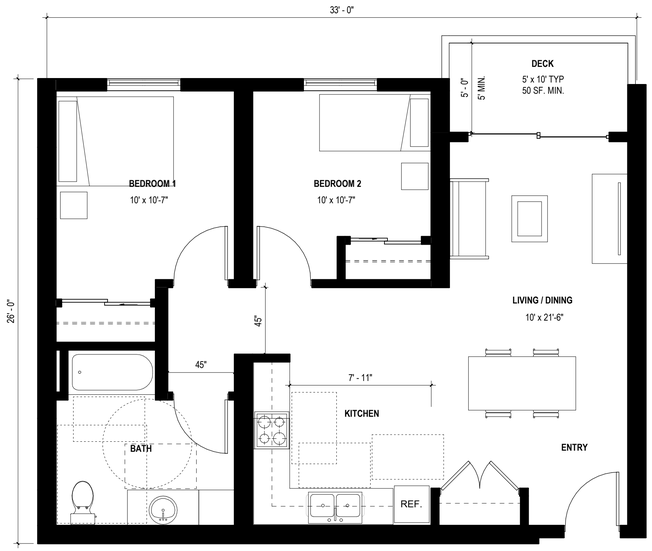


UNIT U-8
3 BEDROOM / 2 BATH
1091 SF

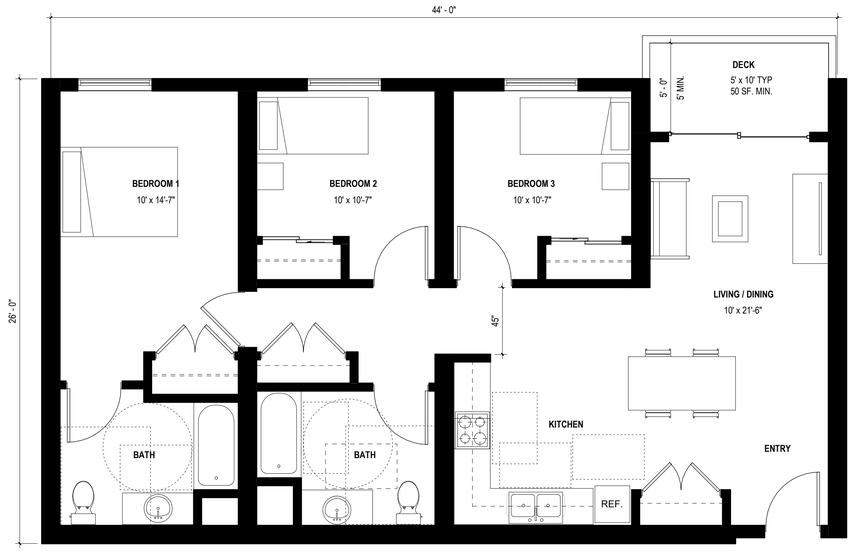
2 UNIT PLANS - U-6, U-7, U-8
SCALE: 1/4" = 1'-0"



UNIT A-1
1 BEDROOM / 1 BATH
539 SF



UNIT A-2
2 BEDROOM / 1 BATH
818 SF



UNIT A-3
3 BEDROOM / 2 BATH
1091 SF

1 UNIT PLANS - A-1. A-2, A-3
SCALE: 1/4" = 1'-0"

0 2' 4' 8'

CMWC, LLC

Exhibit A

21001.00

1667 EAST 18TH STREET
LOS ANGELES, CALIFORNIA 90059

Frederick Fisher and Partners
12248 Santa Monica Blvd.
Los Angeles, CA 90025

CHARLES R. DREW UNIVERSITY OF MEDICINE AND SCIENCE — CDU

CENTURY

	ISSUED FOR	DATE
1	SITE PLAN - RESUBMITTAL II	09/17/2024
2	SITE PLAN - RESUBMITTAL III	01/27/2025
3	SITE PLAN - RESUBMITTAL IV	03/27/2025
4	SITE PLAN - RESUBMITTAL V	07/01/2025
5	SITE PLAN - RESUBMITTAL VI	11/05/2025

UNIT PLANS

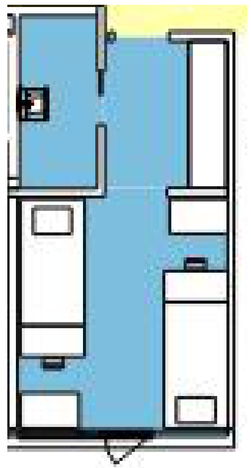
SCALE: As indicated

A0.3.1

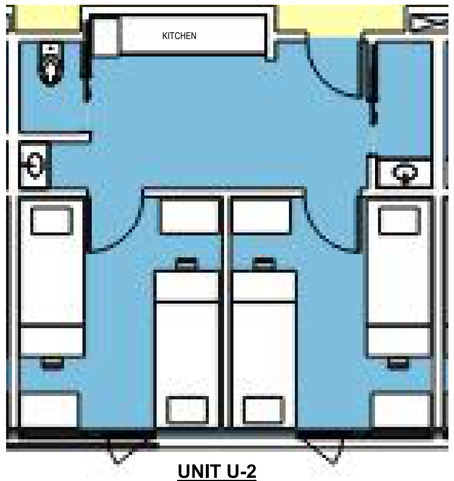
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UNIT TABLE KEY

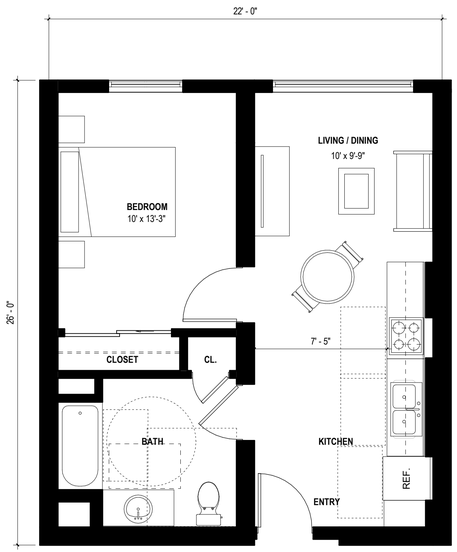
- UNITS U-1 & U-2 IN BLDG. U3
- UNITS U-3, U-4, U-5, U-6, U-7, & U-8 IN BLDGS. U1, U2, & U4
- UNITS A-1, A-2 & A-3 IN BLDGS. A-1, A-2, A-3, A-4, & A-5



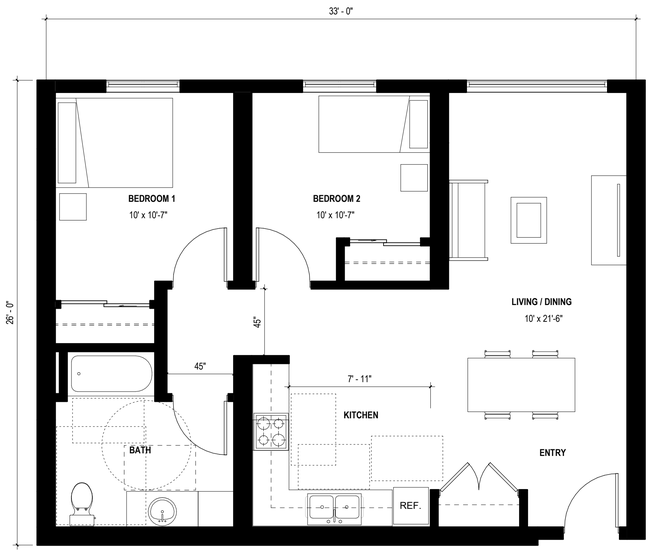
UNIT U-1
STUDIO / 1 BATH
230 SF



UNIT U-2
2 BEDROOM / 1.5 BATH
460 SF



UNIT U-3
1 BEDROOM / 1 BATH
539 SF



UNIT U-4
2 BEDROOM / 1 BATH
818 SF



UNIT U-5
3 BEDROOM / 2 BATH
1091 SF

1 UNIT PLANS - S-1, S-2, S-3, S-4, S-5
SCALE: 1/4" = 1'-0"

CMWC, LLC

Exhibit A

21001.00

1667 EAST 18TH STREET
LOS ANGELES, CALIFORNIA 90059

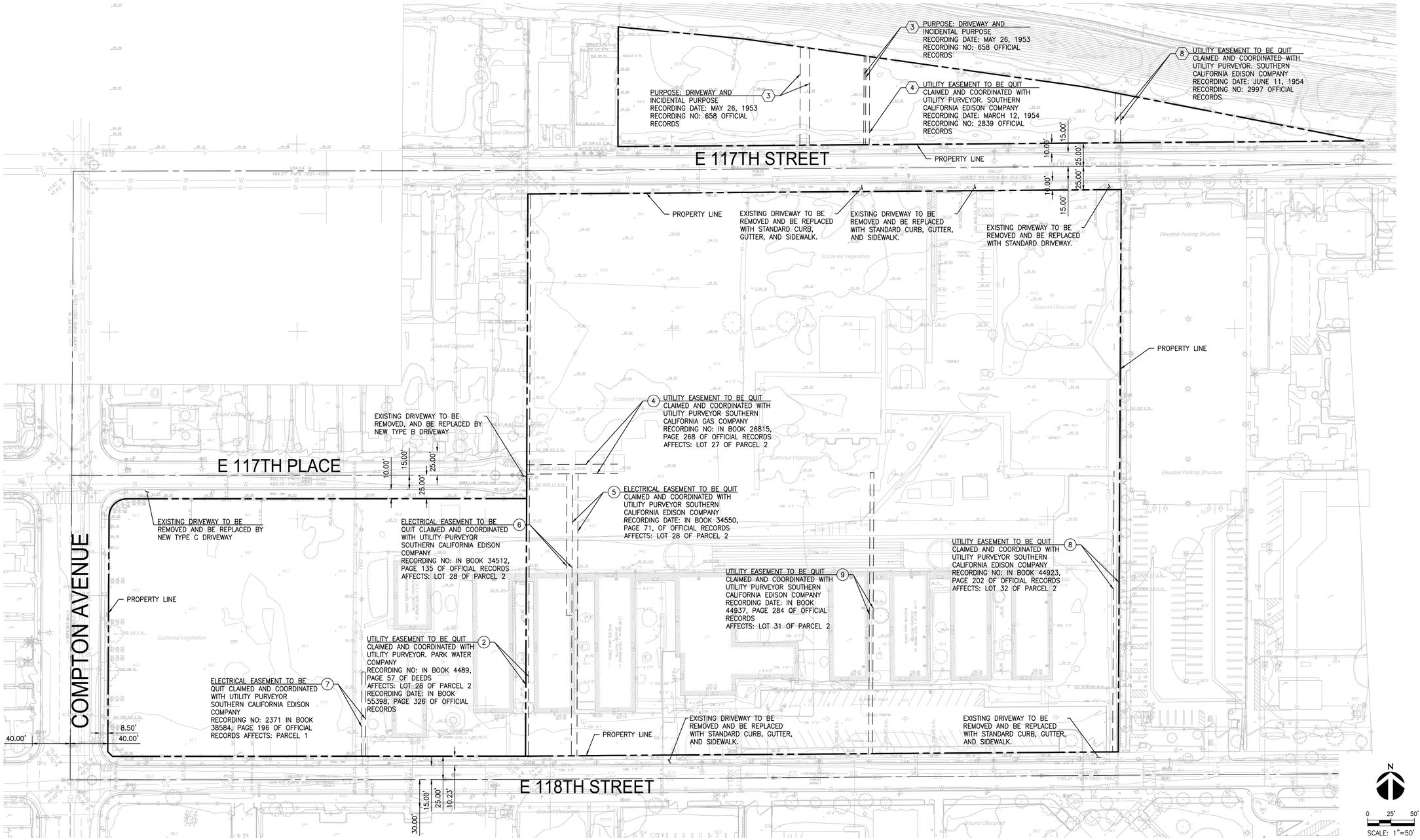
Frederick Fisher and **Partners**
12248 Santa Monica Blvd.
Los Angeles, CA 90025

	ISSUED FOR	DATE
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2	SITE PLAN - RESUBMITTAL III	01/27/2025
3	SITE PLAN - RESUBMITTAL IV	03/27/2025
4	SITE PLAN - RESUBMITTAL V	07/01/2025
5	SITE PLAN - RESUBMITTAL VI	11/05/2025

UNIT PLANS

SCALE: As indicated

A0.3.2



EXCEPTIONS

(PER CHICAGO TITLE COMPANY ORDER NO. 00152339-994-LT2-JC DATED MAY 4, 2021)

2. EASEMENT(S) FOR THE PURPOSE(S) SHOWN BELOW AND RIGHTS INCIDENTAL THERETO AS SET FORTH IN A DOCUMENT:

   IN FAVOR OF: SOUTH GATE WATER COMPANY
   PURPOSE: INGRESS AND EGRESS, PIPE LINES TO CONDUCT AND DISTRIBUTE WATER FOR DOMESTIC AND IRRIGATION PURPOSES AND INCIDENTAL PURPOSES
   RECORDING DATE: OCTOBER 2, 1912
   RECORDING NO: BOOK 5177, PAGE 272 DEEDS
   AFFECTS: NOT TO EXCEED 3 FEET ON EITHER SIDE OF BOUNDARY LINES OF SAID LOT 12

   AND RE-RECORDING DATE: APRIL 14, 1914
   AND RE-RECORDING NO: BOOK 5771, PAGE 177 DEEDS

NOT PLOTTED – DOES NOT AFFECT SUBJECT PROPERTY.

3. EASEMENT(S) FOR THE PURPOSE(S) SHOWN BELOW AND RIGHTS INCIDENTAL THERETO AS SET FORTH IN A DOCUMENT:

   PURPOSE: DRIVEWAY AND INCIDENTAL PURPOSES
   RECORDING DATE: MAY 26, 1953
   RECORDING NO: 658 OFFICIAL RECORDS
   AFFECTS: A PORTION OF SAID LAND AS MORE PARTICULARLY DESCRIBED IN SAID DOCUMENT.

4. EASEMENT(S) FOR THE PURPOSE(S) SHOWN BELOW AND RIGHTS INCIDENTAL THERETO AS SET FORTH IN A DOCUMENT:

   IN FAVOR OF: SOUTHERN CALIFORNIA EDISON COMPANY, A CORPORATION
   PURPOSE: PUBLIC UTILITIES AND INCIDENTAL PURPOSES
   RECORDING DATE: MARCH 12, 1954
   RECORDING NO: 2839 OFFICIAL RECORDS
   AFFECTS: SAID EASEMENT AFFECTS THE EASTERLY 6 FEET OF SAID LAND

7. EASEMENT(S) FOR THE PURPOSE(S) SHOWN BELOW AND RIGHTS INCIDENTAL THERETO AS SET FORTH IN A DOCUMENT:

   IN FAVOR OF: SOUTHGATE SYNDICATE, A CORPORATION
   PURPOSE: WATER PIPE LINES AND INCIDENTAL PURPOSES
   RECORDING NO: BOOK 4758, PAGE 310 DEEDS
   AFFECTS: SAID EASEMENT AFFECTS THE EXTERIOR BOUNDARY LINES OF SAID LAND

NOT PLOTTED – WIDTHS NOT DESCRIBED IN DOCUMENT

8. EASEMENT(S) FOR THE PURPOSE(S) SHOWN BELOW AND RIGHTS INCIDENTAL THERETO AS SET FORTH IN A DOCUMENT:

   IN FAVOR OF: SOUTHERN CALIFORNIA EDISON COMPANY
   PURPOSE: PUBLIC UTILITIES AND INCIDENTAL PURPOSES
   RECORDING DATE: JUNE 11, 1954
   RECORDING NO: 2997 OFFICIAL RECORDS
   AFFECTS: SAID EASEMENT AFFECTS THE EASTERLY 6 FEET OF SAID LAND

EXCEPTIONS

(PER CHICAGO TITLE COMPANY ORDER NO. 00152338-994-LT2-JC DATED MAY 4, 2021)

2. EASEMENT(S) FOR THE PURPOSE(S) SHOWN BELOW AND RIGHTS INCIDENTAL THERETO, AS GRANTED IN A DOCUMENT:

   PURPOSE: PIPE LINES
   RECORDING DATE: IN BOOK 4489, PAGE 57 OF DEEDS
   AFFECTS: LOT 28 OF PARCEL 2

   AN AGREEMENT TO MODIFY THE TERMS AND PROVISIONS OF THE SAID DOCUMENT, AS THEREIN PROVIDED

   RECORDING DATE: IN BOOK 55398, PAGE 326 OF OFFICIAL RECORDS

3. EASEMENT(S) FOR THE PURPOSE(S) SHOWN BELOW AND RIGHTS INCIDENTAL THERETO, AS GRANTED IN A DOCUMENT:

   PURPOSE: PIPE LINES
   RECORDING DATE: IN BOOK 5177, PAGE 272, OF DEEDS
   AFFECTS: LOTS 24, 25, 27, 29, 30, 32 OF PARCEL 2

   AND RE-RECORDING NO: IN BOOK 5771, PAGE 177, OF DEEDS

NOT PLOTTED – DOES NOT AFFECT SUBJECT PROPERTY

4. EASEMENT(S) FOR THE PURPOSE(S) SHOWN BELOW AND RIGHTS INCIDENTAL THERETO, AS GRANTED IN A DOCUMENT:

   PURPOSE: PIPE LINES
   RECORDING DATE: APRIL 2, 1948
   RECORDING NO: IN BOOK 26815, PAGE 268 OF OFFICIAL RECORDS
   AFFECTS: LOT 27 OF PARCEL 2

5. EASEMENT(S) FOR THE PURPOSE(S) SHOWN BELOW AND RIGHTS INCIDENTAL THERETO, AS GRANTED IN A DOCUMENT:

   PURPOSE: POLE LINES
   RECORDING DATE: IN BOOK 34550, PAGE 71, OF OFFICIAL RECORDS
   AFFECTS: LOT 28 OF PARCEL 2

6. EASEMENT(S) FOR THE PURPOSE(S) SHOWN BELOW AND RIGHTS INCIDENTAL THERETO, AS GRANTED IN A DOCUMENT:

   PURPOSE: POLE LINES
   RECORDING DATE: OCTOBER 9, 1950
   RECORDING NO: IN BOOK 34512, PAGE 135 OF OFFICIAL RECORDS
   AFFECTS: LOT 28 OF PARCEL 2

7. EASEMENT(S) FOR THE PURPOSE(S) SHOWN BELOW AND RIGHTS INCIDENTAL THERETO, AS GRANTED IN A DOCUMENT:

   PURPOSE: PUBLIC UTILITIES
   RECORDING DATE: MARCH 28, 1952
   RECORDING NO: 2371 IN BOOK 38584, PAGE 196 OF OFFICIAL RECORDS
   AFFECTS: PARCEL 1

8. EASEMENT(S) FOR THE PURPOSE(S) SHOWN BELOW AND RIGHTS INCIDENTAL THERETO, AS GRANTED IN A DOCUMENT:

   PURPOSE: POLE LINES AND CONDUITS
   RECORDING DATE: JUNE 28, 1954
   RECORDING NO: IN BOOK 44923, PAGE 202 OF OFFICIAL RECORDS
   AFFECTS: LOT 32 OF PARCEL 2

9. EASEMENT(S) FOR THE PURPOSE(S) SHOWN BELOW AND RIGHTS INCIDENTAL THERETO, AS GRANTED IN A DOCUMENT:

   PURPOSE: POLE LINES
   RECORDING DATE: IN BOOK 44937, PAGE 284, OF OFFICIAL RECORDS
   AFFECTS: LOT 31 OF PARCEL 2

CMWC, LLC

Exhibit A

21001.00

1667 EAST 18TH STREET
LOS ANGELES, CALIFORNIA 90059

Frederick Fisher and **Partners**
12248 Santa Monica Blvd.
Los Angeles, CA 90025

ISSUED FOR	DATE
1 SITE PLAN - RESUBMITTAL II	11/05/2025

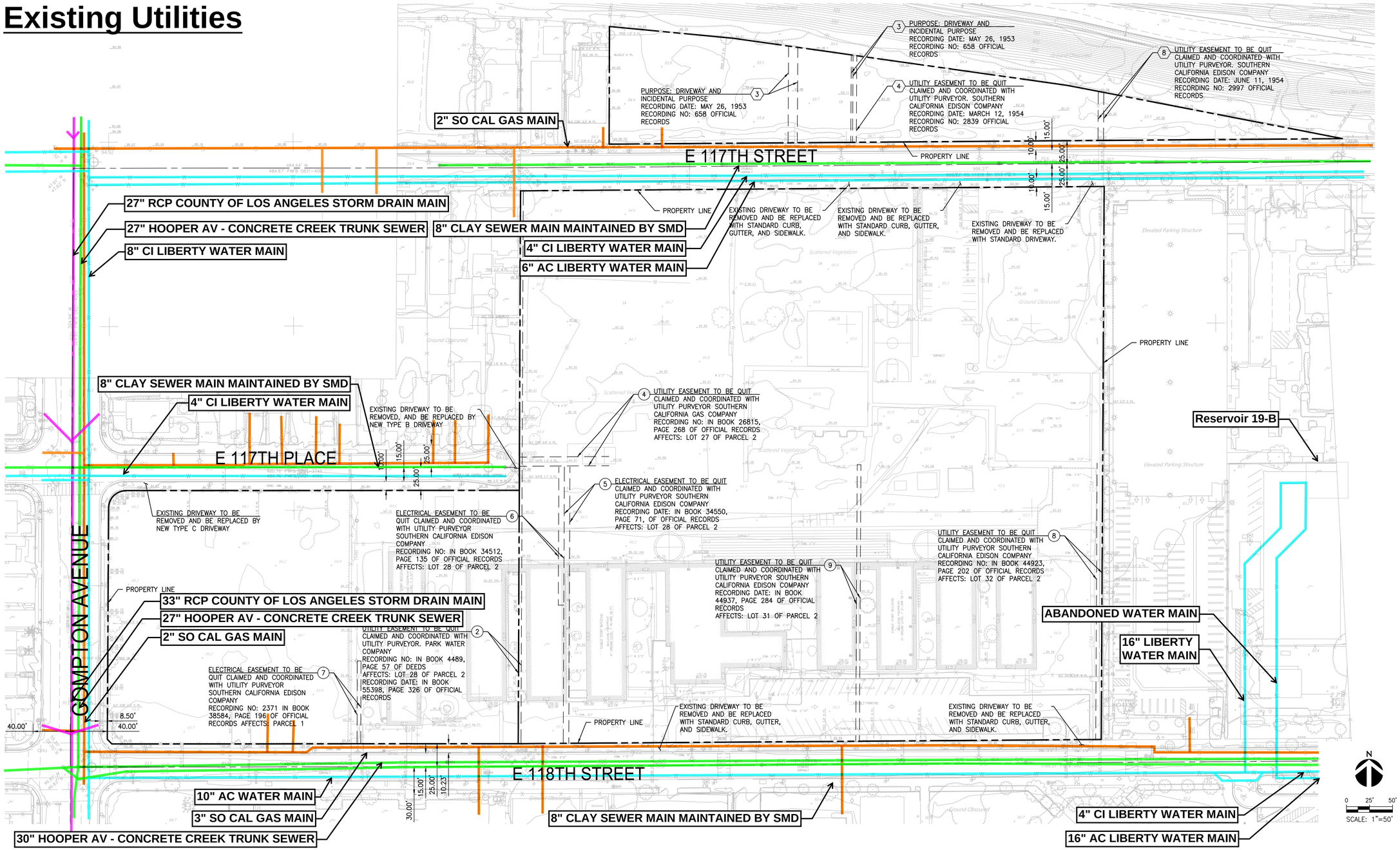
kpff
700 South Flower Street
Suite 2100
Los Angeles, CA 90017
O: 213.418.0201
www.kpff.com

EXISTING CONDITIONS (FOR REFERENCE ONLY)

C1.00

P:\2021\21001\76 Willowbrook Wellness Ctr North Campus\5 CAD\Sheets\21001\76-C1.00VM.dwg, Nov 07, 2025 - 11:03am

Existing Utilities



LEGEND

- DW — DOMESTIC WATER OWNED BY LIBERTY
- SS — SANITARY SEWER OWNED BY LOS ANGELES COUNTY
- SD — STORM DRAIN OWNED BY LOS ANGELES COUNTY
- G — GAS OWNED BY SOCAL EDISON
- PROPERTY LINE

P:\2021\2100176 Willowbrook Wellness Ctr North Campus\5 CAD\Sheets\2100176-C1.00VM.dwg, Nov 07, 2025 - 11:03am

CMWC, LLC

Exhibit A

21001.00

1667 EAST 18TH STREET
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CHARLES R. DREW UNIVERSITY OF MEDICINE AND SCIENCE — CDU

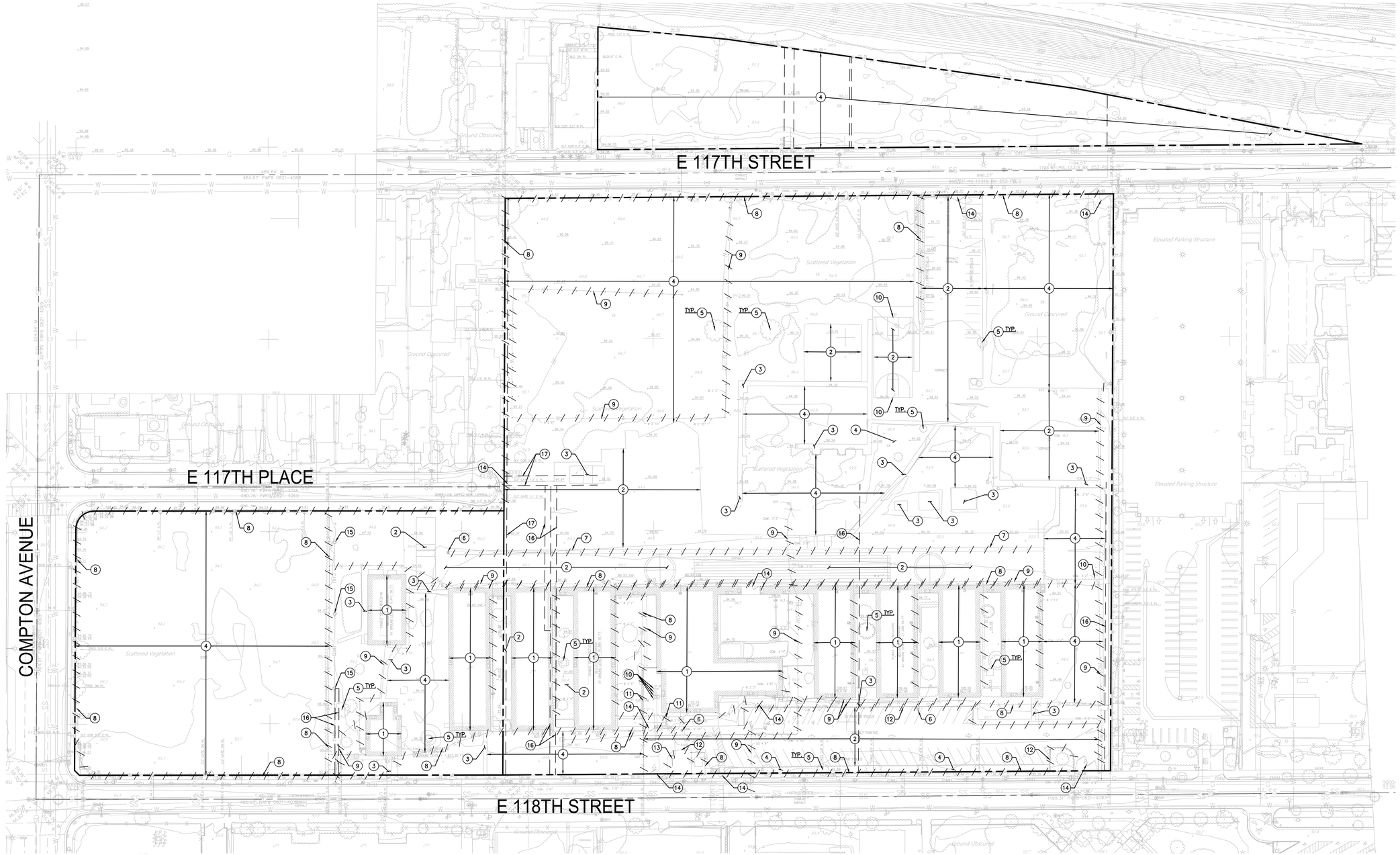
CENTURY

ISSUED FOR	DATE
1 SITE PLAN - RESUBMITTAL II	11/05/2025

kpff
700 South Flower Street
Suite 2100
Los Angeles, CA 90017
O: 213.418.0201
www.kpff.com

EXISTING CONDITIONS (FOR REFERENCE ONLY)

C1.00



GENERAL DEMOLITION NOTES:

1. CONTRACTOR TO CLEAR PROJECT SITE AREA WITHIN THE CONFINES OF THE DEMOLITION LIMIT LINE. THE CONTRACTOR SHALL DEMOLISH AND REMOVE FROM THE SITE ALL EXISTING UTILITIES, STRUCTURES, PLANTERS, TREES, AND ALL OTHER SITE FEATURES, UNLESS OTHERWISE NOTED ON THE PLAN.
2. REMOVAL OF LANDSCAPING SHALL INCLUDE ROOTS AND ORGANIC MATERIALS.
3. THE CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING ANY AND ALL PERMITS AND SHALL PAY ALL FEES NECESSARY FOR ENCROACHMENT, GRADING, DEMOLITION AND DISPOSAL OF SAID MATERIALS AS REQUIRED BY PRIVATE, LOCAL AND STATE JURISDICTIONS.
4. THE CONTRACTOR SHALL BE RESPONSIBLE FOR A SITE INSPECTION TO FULLY ACKNOWLEDGE THE EXTENT OF THE DEMOLITION WORK.
5. THE CONTRACTOR SHALL VERIFY AND LOCATE ALL EXISTING ABOVE AND UNDERGROUND UTILITIES. LOCATIONS SHOWN ON THE PLANS ARE APPROXIMATE AND ARE SHOWN FOR GENERAL INFORMATION ONLY.
6. DAMAGE TO ANY EXISTING UTILITIES AND SERVICES TO REMAIN SHALL BE THE RESPONSIBILITY OF THE CONTRACTOR. CONTRACTOR SHALL REPAIR AND/OR REPLACE IN KIND.
7. EROSION CONTROL MEASURES SHALL BE IMPLEMENTED TO PREVENT DEBRIS AND UNSUITABLE MATERIALS FROM ENTERING STORM DRAINS, SANITARY SEWERS AND STREETS.
8. DUST CONTROL SHALL BE IMPLEMENTED DURING DEMOLITION.
9. DEMOLITION IS LIMITED TO WITHIN DEMOLITION LIMIT LINE UNLESS NOTED OTHERWISE.
10. THE CONTRACTOR SHALL VERIFY THE LOCATION AND QUANTITY OF EXISTING SURFACE STRUCTURES AND SHALL BE SOLELY RESPONSIBLE FOR ANY UNIDENTIFIED UTILITIES, IMPROVEMENTS, TREES, ETC. TO BE DEMOLISHED AND REMOVED WITHIN THE DEMOLITION LIMIT LINE, INCLUDING APPURTENANT FOUNDATIONS OR SUPPORTS.
11. DEMOLITION CALLOUTS IN THIS SECTION ARE REPRESENTATIVE OF WHAT IS TO BE DONE, NOT AN ITEMIZED ACCOUNTING FOR EACH PIPE, CATCH BASIN, MANHOLE, VAULT, ETC. THAT IS TO BE DEMOLISHED, REMOVED AND DISPOSED OF.

DEMOLITION NOTES:

DEMOLISH & REMOVE

1. BUILDING AND FOUNDATION
2. ASPHALT PAVEMENT
3. CONCRETE PAVEMENT
4. CLEAR VEGETATION AND DEBRIS
5. TREE
6. CATCH BASIN
7. CONCRETE GUTTER
8. FENCE AND ASSOCIATED FOOTING
9. ALL EXISTING UTILITY THAT SERVE EXISTING BUILDINGS SHALL BE REMOVE. UTILITIES SHALL BE CUT AND CAPPED PER LOCAL JURISDICTION.
10. POLE AND ASSOCIATED FOOTING
11. WALL AND ASSOCIATED FOOTING
12. CURB
13. SIGN AND ASSOCIATED FOOTING
14. GATE AND ASSOCIATED FOOTING
15. POLES TO BE REMOVED. EASEMENT TO BE QUIT CLAIMED AND COORDINATE WITH UTILITY PURVEYOR.
16. ELECTRICAL EASEMENT TO BE QUIT CLAIMED AND COORDINATED WITH UTILITY PURVEYOR.
17. UTILITY EASEMENT TO BE QUIT CLAIMED AND COORDINATED WITH UTILITY PURVEYOR.

LEGEND:

- LIMIT LINE OF DEMOLITION
- PROPERTY LINE
- DEMOLITION LINE

N

0 25' 50'

SCALE: 1"=50'

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CMWC, LLC

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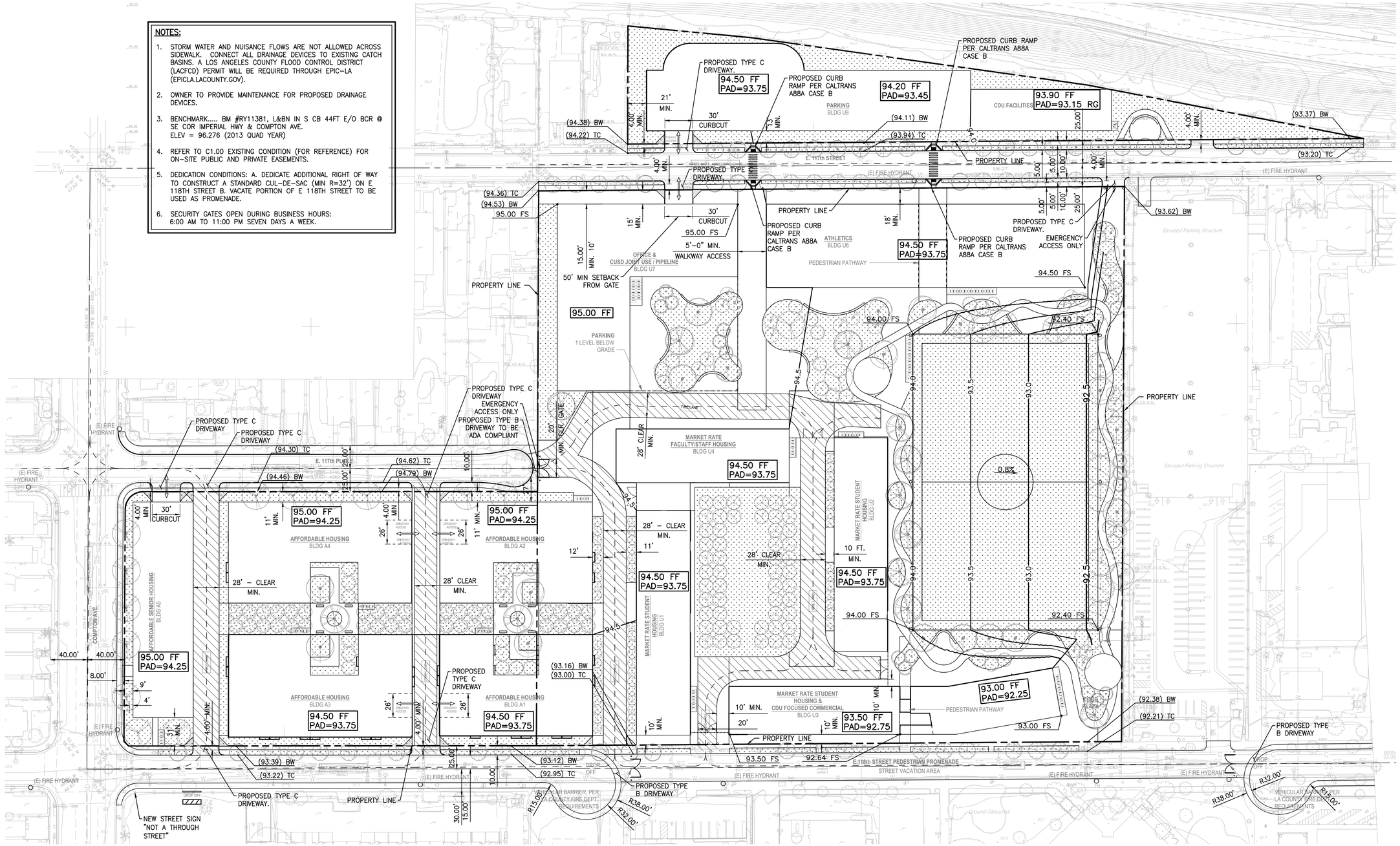
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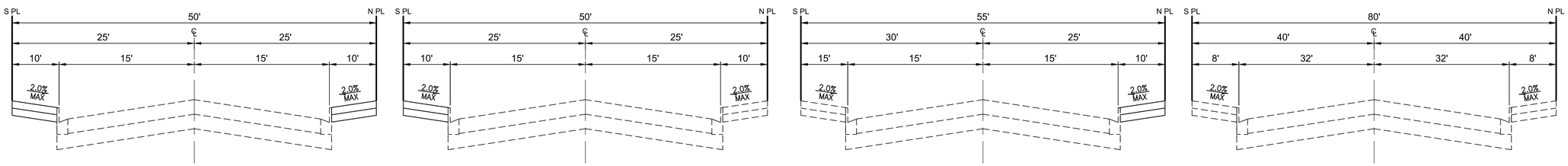
DEMOLITION PLAN

C1.20

NOTES:

1. STORM WATER AND NUISANCE FLOWS ARE NOT ALLOWED ACROSS SIDEWALK. CONNECT ALL DRAINAGE DEVICES TO EXISTING CATCH BASINS. A LOS ANGELES COUNTY FLOOD CONTROL DISTRICT (LACFCD) PERMIT WILL BE REQUIRED THROUGH EPIC-LA (EPICLA.LACOUNTY.GOV).
2. OWNER TO PROVIDE MAINTENANCE FOR PROPOSED DRAINAGE DEVICES.
3. BENCHMARK..... BM #RY11381, L&BN IN S CB 44FT E/O BCR @ SE COR IMPERIAL HWY & COMPTON AVE. ELEV = 96.276 (2013 QUAD YEAR)
4. REFER TO C1.00 EXISTING CONDITION (FOR REFERENCE) FOR ON-SITE PUBLIC AND PRIVATE EASEMENTS.
5. DEDICATION CONDITIONS: A. DEDICATE ADDITIONAL RIGHT OF WAY TO CONSTRUCT A STANDARD CUL-DE-SAC (MIN R=32') ON E 118TH STREET B. VACATE PORTION OF E 118TH STREET TO BE USED AS PROMENADE.
6. SECURITY GATES OPEN DURING BUSINESS HOURS: 6:00 AM TO 11:00 PM SEVEN DAYS A WEEK.





N

0 25' 50'

SCALE: 1"=50'

P:\2021\21001\76 Willowbrook Wellness Ctr North Campus\5 CAD\Sheets\21001\76-C1.30GP.dwg, Nov 07, 2025 - 12:51pm

CMWC, LLC

Exhibit A

21001.00

1667 EAST 18TH STREET
LOS ANGELES, CALIFORNIA 90059

Frederick Fisher and Partners
12248 Santa Monica Blvd.
Los Angeles, CA 90025

CHARLES R. DREW UNIVERSITY OF MEDICINE AND SCIENCE — CDU

CENTURY

ISSUED FOR	DATE
1 SITE PLAN - RESUBMITTAL II	11/05/2025

REGISTERED PROFESSIONAL ENGINEER
CHRISTOPHE N. BOWMAN
No. C 93027
3/31/27
CIVIL
STATE OF CALIFORNIA

kpff
700 South Flower Street
Suite 2100
Los Angeles, CA 90017
O: 213.418.0201
www.kpff.com

GRADING PLAN

C1.30

Grading and Earthwork Quantities

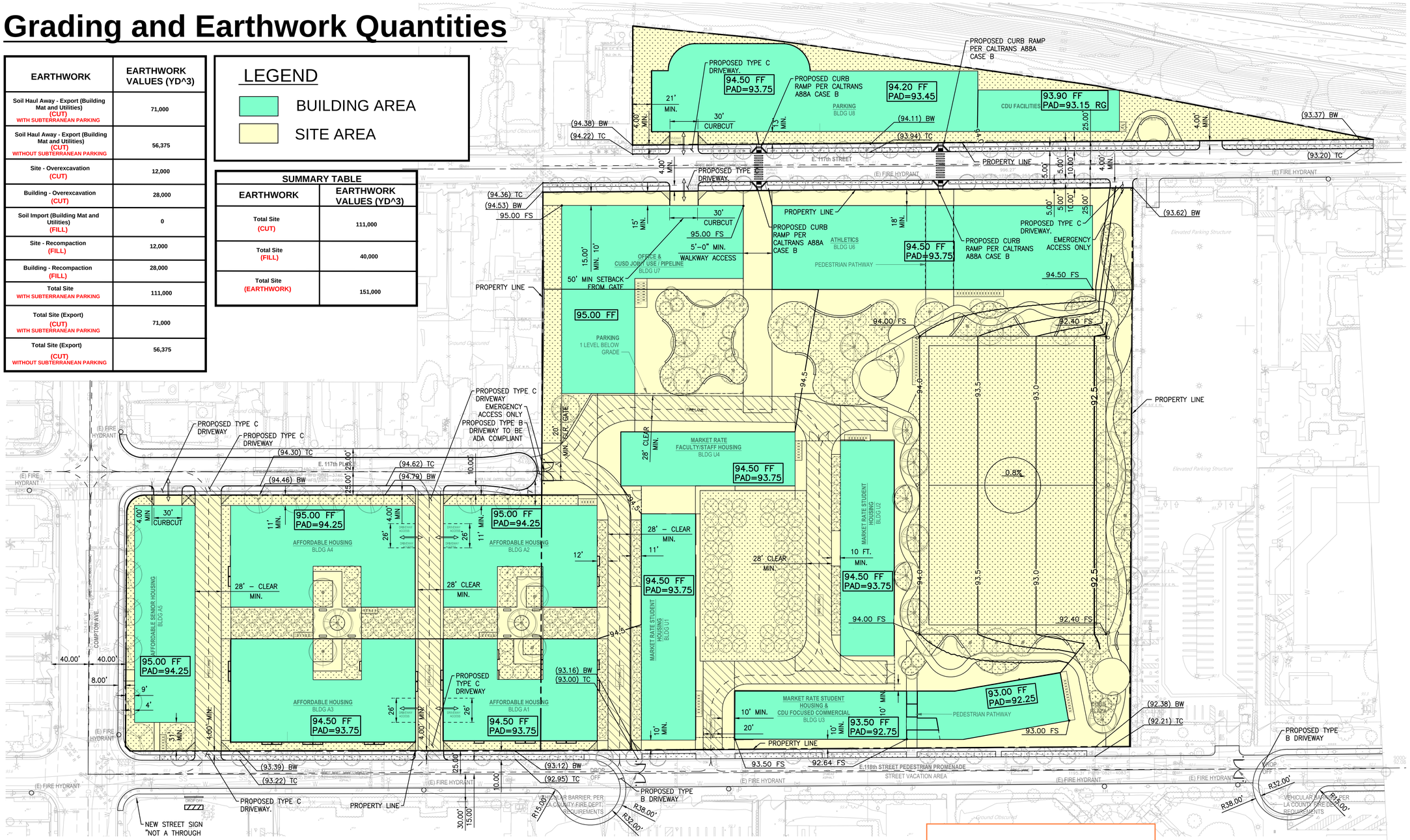
EARTHWORK	EARTHWORK VALUES (YD^3)
Soil Haul Away - Export (Building Mat and Utilities) (CUT) WITH SUBTERRANEAN PARKING	71,000
Soil Haul Away - Export (Building Mat and Utilities) (CUT) WITHOUT SUBTERRANEAN PARKING	56,375
Site - Overexcavation (CUT)	12,000
Building - Overexcavation (CUT)	28,000
Soil Import (Building Mat and Utilities) (FILL)	0
Site - Recompaction (FILL)	12,000
Building - Recompaction (FILL)	28,000
Total Site WITH SUBTERRANEAN PARKING	111,000
Total Site (Export) (CUT) WITH SUBTERRANEAN PARKING	71,000
Total Site (Export) (CUT) WITHOUT SUBTERRANEAN PARKING	56,375

LEGEND

BUILDING AREA

SITE AREA

SUMMARY TABLE	
EARTHWORK	EARTHWORK VALUES (YD^3)
Total Site (CUT)	111,000
Total Site (FILL)	40,000
Total Site (EARTHWORK)	151,000

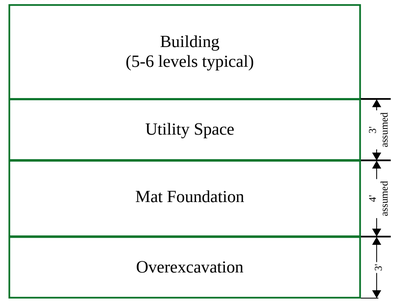


Recommended Overexcavation

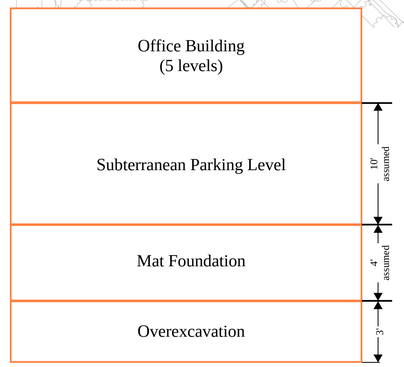
*Excerpt found on pg. 18 of "Geotechnical Engineering Investigation Proposed Wellness Campus 1667 East 118th Street and 1660 Block of East 117th Street Willowbrook, California"

Within the proposed building areas, all existing fill and upper native alluvial soils shall be excavated to a minimum depth of 5 feet below the bottom of the proposed grade, or 3 feet below the bottom of the proposed foundations, whichever is greater. In addition, the excavation shall extend horizontally at least 3 feet beyond the edge of foundations, or for a distance equal to the depth of fill below the foundations, whichever is greater. It is very important that the position of the proposed structures is accurately located so that the limits of the graded area are accurate and the grading operation proceeds efficiently.

*Dimensions shown are not to scale on Side Profile View



Rough Grading for Buildings



Rough Grading for Subterranean Parking

N

0 25' 50'

SCALE: 1"=50'

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CMWC, LLC

Exhibit A

21001.00

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CENTURY

ISSUED FOR	DATE
1 SITE PLAN - RESUBMITTAL II	11/05/2025

REGISTERED PROFESSIONAL ENGINEER CHRISTOPHE N. BORNHEIM No. C85220 Exp. 3/31/27 CIVIL STATE OF CALIFORNIA

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CUT AND FILL PLAN

C1.30G

Proposed Storm Drain and Low Impact Development Study Map

LEGEND

- EXISTING STORM DRAIN LINE
- PROPOSED STORM DRAIN LINE
- PROPERTY LINE
- DRAINAGE AREA BORDER
- DETENTION PIPE
- MANHOLE
- CDS UNIT
- DRYWELL
- CATCH BASIN

EXISTING RESIDENTIAL NEIGHBORHOOD
*NO CROSS LOT FLOW**

EXISTING RESIDENTIAL NEIGHBORHOOD
*NO CROSS LOT FLOW**

DMA 4
Area: 56,564 SF

DMA 3
Area: 67,288 SF

DMA 2
Area: 285,812 SF

DMA 1
Area: 148,214 SF

27" RCP COUNTY OF LOS ANGELES STORM DRAIN MAIN

33" RCP COUNTY OF LOS ANGELES STORM DRAIN MAIN

E. 117th PLACE
E. 117th STREET
E. 118th PLACE
E.118th STREET PEDESTRIAN PROMENADE
STREET VACATION AREA
COMPTON AVE.
Compton Ave
21' MIN.
30' CURBCUT
5' IN.
18' MIN.
11' MIN.
26' DRIVEWAY ACCESS
1' MIN.
9'
4'
3' MIN.
20' MIN. CLR. GATE
28' CLEAR MIN.
10 FT. MIN.
10' MIN.
20'
11'
CDU FACILITIES
ATHLETICS
BLDG U6
PEDESTRIAN PATHWAY
PARKING
1 LEVEL BELOW GRADE
MARKET RATE FACULTY/STAFF HOUSING
BLDG U4
MARKET RATE STUDENT HOUSING
BLDG U2
MARKET RATE STUDENT HOUSING
BLDG U1
AFFORDABLE SENIOR HOUSING
BLDG A5
AFFORDABLE HOUSING
BLDG A3
AFFORDABLE HOUSING
BLDG A2
MARKET RATE STUDENT HOUSING & CDU FOCUSED COMMERCIAL
BLDG U3
COBB PLAZA
Elevated Parking Structure
(E) FIRE HYDRANT
FIRE DEPT. ACCESS ROAD
FIRE LANE
HIGH FLOW STORAGE
Q85TH FLOW
CDS Unit
OVERFLOW TO STREET
OVERFLOW
HIGHFLOW STORAGE
VEHICULAR BARRIER, PER LA COUNTY FIRE DEPT. REQUIREMENTS

DMA 4
Q85th percentile required= 2,535 CF
Q85th percentile treated= 2,620 CF
Area =56,564 sf
Q_{25yr} =2.95 cfs

DMA 3
Area =67,288 sf
Q_{25yr} =4.26 cfs
Q85th percentile required= 4,319 CF
Q85th percentile treated= 4,411 CF

DMA 2
Q85th percentile required= 12,310 CF
Q85th percentile treated= 12,429 CF
Area =285,812 sf
Q_{25yr} = 12.32 cfs

DMA 1
Q85th percentile required= 8,522 CF
Q85th percentile treated= 8,620 CF
Area =148,214 sf
Q_{25yr} =9.33 cfs

Drywell V= 264 CF

LID System Conceptual Layout
8' Diameter
72' Long
(1) Detention Pipe
V= 3,619 CF

LID System Conceptual Layout
8' Diameter
100' Long
(2) Detention Pipes
V= 10,053 CF

LID System Conceptual Layout
8' Diameter
70' Long
(2) Detention Pipes
V= 7,037 CF

LID System Conceptual Layout
6' Diameter
46' Long
(1) Detention Pipe
V= 1,301 CF

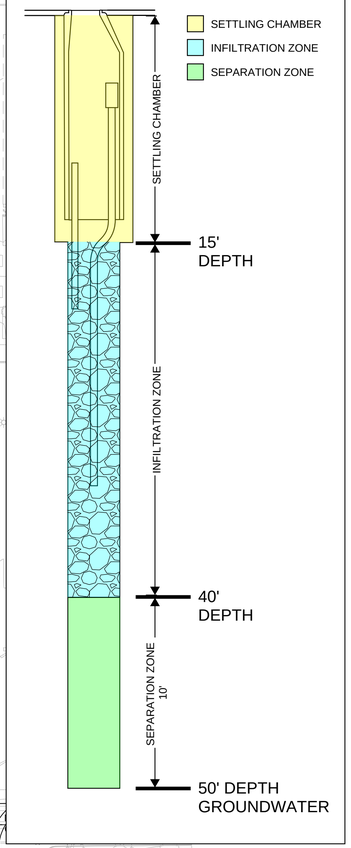
NOTE:
ASSUMED INFILTRATION RATE = 1.12 INCHES PER HOUR.

OWNER WILL MAINTAIN DRYWELLS, DETENTION PIPES, AND ALL OTHER DRAINAGE FACILITIES ON SITE.

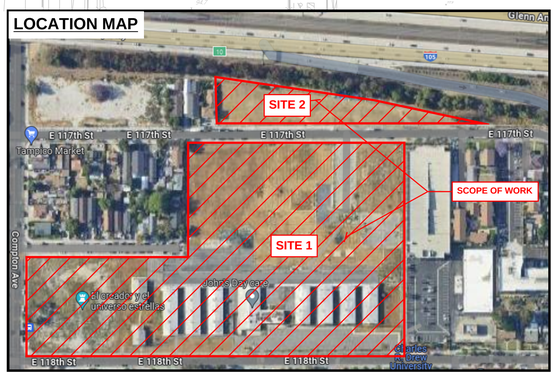
LID TREATMENT SYSTEMS LAYOUT ARE CONCEPTUAL AND WILL BE REVISED DURING THE DESIGN PHASE.

NOTE:
NOT WITHIN COUNTY ADOPTED FLOODWAY.
NOT WITHIN FEMA ZONE "A".

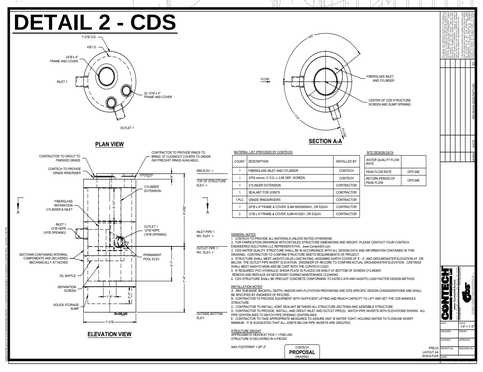
DETAIL 1 - DRYWELL LAYOUT



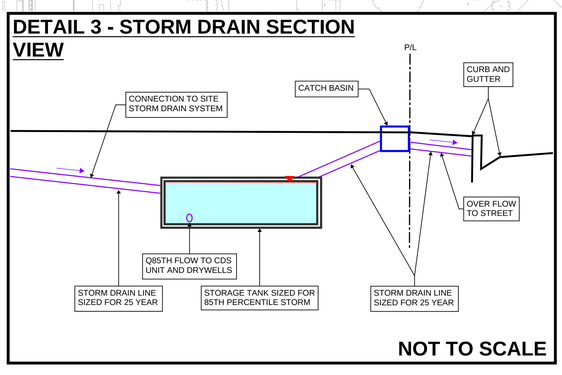
LOCATION MAP



DETAIL 2 - CDS



DETAIL 3 - STORM DRAIN SECTION VIEW



LID Treatment Summary Table

Drainage Management Area	85TH Percentile Required Volume (cf)	Total Detention Capacity (Peak Flow Mitigation And LID) (cf)
1	8,522	8,620
2	12,310	12,429
3	4,319	4,411
4	2,535	2,620

N

0 25' 50'

SCALE: 1"=50'

UTILITY PLAN

C1.40

CMWC, LLC

Exhibit A

21001.00

1667 EAST 18TH STREET
LOS ANGELES, CALIFORNIA 90059

Frederick Fisher and Partners
12248 Santa Monica Blvd.
Los Angeles, CA 90025

CHARLES R. DREW UNIVERSITY OF MEDICINE AND SCIENCE
CDU
CENTURY

REGISTERED PROFESSIONAL ENGINEER
CHRISTOPHE N. BOWMAN
No. C82888
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CIVIL
STATE OF CALIFORNIA

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O: 213.418.0201
www.kpff.com

ISSUED FOR	DATE
1 SITE PLAN - RESUBMITTAL II	11/05/2025

P:\2021\21001776 Willowbrook Wellness Ctr North Campus\5 CAD\Sheets\21001776-C1.40UT.dwg, Nov 07, 2025 - 11:37am

Proposed Sewer System

8" CLAY SEWER MAIN MAINTAINED BY SMD SLOPE: 0.24%

MANHOLE 115

MANHOLE 116

MANHOLE 117

MANHOLE 118

MANHOLE 119

27" HOOPER AV - CONCRETE CREEK TRUNK SEWER

8" CLAY SEWER MAIN MAINTAINED BY SMD SLOPE: 0.24%

MANHOLE 218

MANHOLE 219

MANHOLE 108

MANHOLE 109

MANHOLE 110

MANHOLE 111

30" HOOPER AV - CONCRETE CREEK TRUNK SEWER S=0.146%

8" CLAY SEWER MAIN MAINTAINED BY SMD SLOPE: 0.24%

27" HOOPER AV - CONCRETE CREEK TRUNK SEWER

E. 117th STREET

E. 117th PLACE

E.118th STREET PEDESTRIAN PROMENADE STREET VACATION AREA

PARKING BLDG U8

CDU FACILITIES

ATHLETICS BLDG U6

OFFICE & CUSD JOINT USE / PIPELINE BLDG U7

PARKING 1 LEVEL BELOW GRADE

MARKET RATE FACULTY/STAFF HOUSING BLDG U4

MARKET RATE STUDENT HOUSING BLDG U2

MARKET RATE STUDENT HOUSING BLDG U1

MARKET RATE STUDENT HOUSING & CDU FOCUSED COMMERCIAL BLDG U3

AFFORDABLE HOUSING BLDG A4

AFFORDABLE HOUSING BLDG A2

AFFORDABLE SENIOR HOUSING BLDG A5

AFFORDABLE HOUSING BLDG A3

AFFORDABLE HOUSING BLDG A1

PEDESTRIAN PATHWAY

COBB PLAZA

(E) FIRE HYDRANT

VEHICULAR BARRIER, PER LA COUNTY FIRE DEPT. REQUIREMENTS

21' MIN.

30' CURB

30' CURBCUT

15' MIN.

18' MIN.

5'-0" MIN. WALKWAY ACCESS

28' CLEAR MIN.

20' MIN. CLEAR GATE

10 FT. MIN.

10' MIN

20'

11' MIN.

12'

26' DRIVEWAY ACCESS

9'

4'

DROP OFF

FIRE DEPT. ACCESS ROAD

COMPTON AVE

PROJECT SITE



LEGEND

- EXISTING SMD SEWER LINE
- PROPOSED 6" SEWER LINE
- EXISTING TRUNK SEWER LINE
- PROPOSED CLEAN OUT
- PROPOSED MANHOLE

N

0 25' 50'

SCALE: 1"=50'

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CMWC, LLC

Exhibit A

21001.00

1667 EAST 18TH STREET
LOS ANGELES, CALIFORNIA 90059

Frederick Fisher and **Partners**
12248 Santa Monica Blvd.
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CHARLES R. DREW UNIVERSITY OF MEDICINE AND SCIENCE — CDU

CENTURY

ISSUED FOR	DATE
1 SITE PLAN - RESUBMITTAL II	11/05/2025

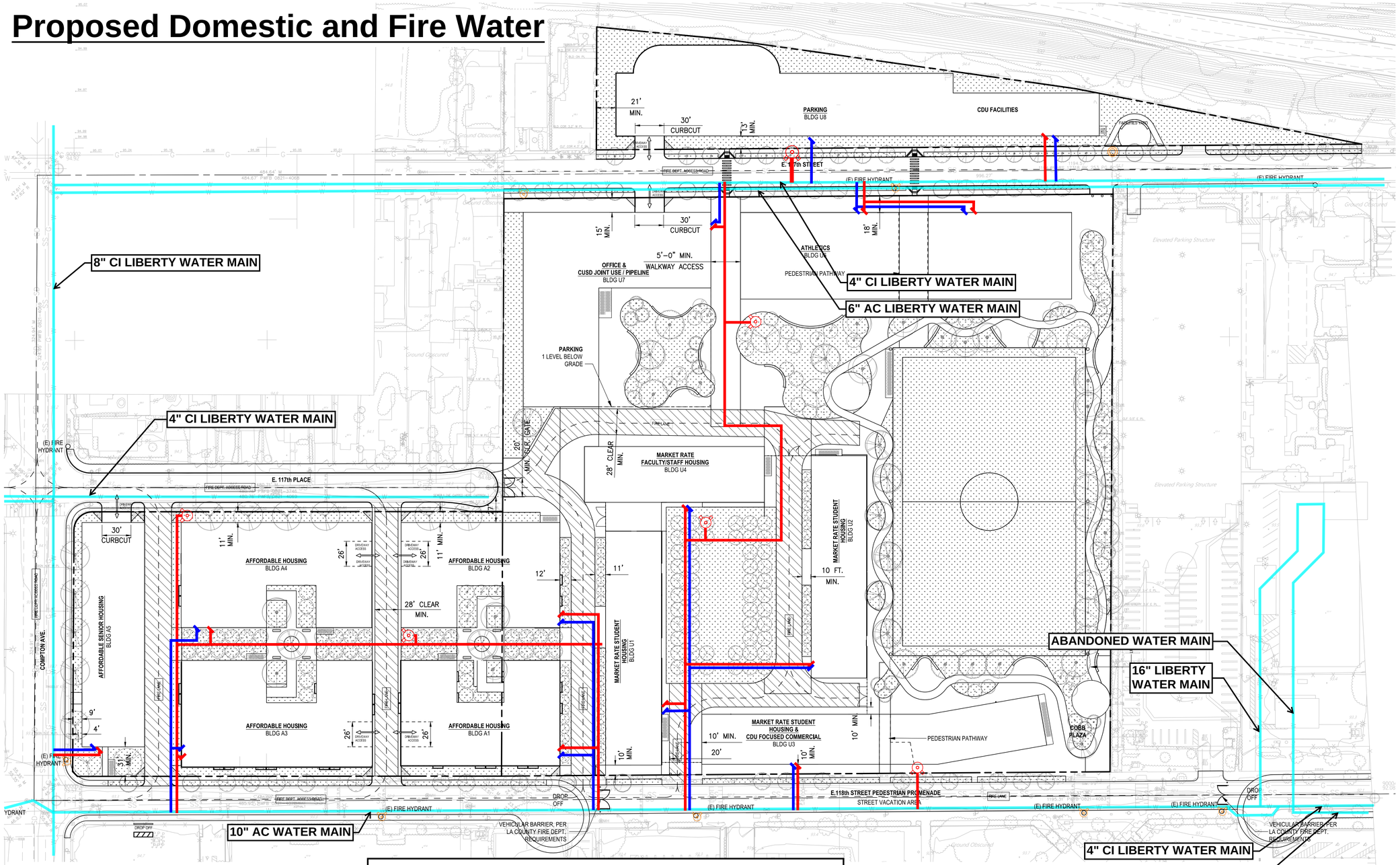
REGISTERED PROFESSIONAL ENGINEER — CHRISTOPHE N. BORNHOFT — No. C88xxx — Exp. 3/31/27 — CIVIL — STATE OF CALIFORNIA

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700 South Flower Street
Suite 2100
Los Angeles, CA 90017
O: 213.418.0201
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UTILITY PLAN

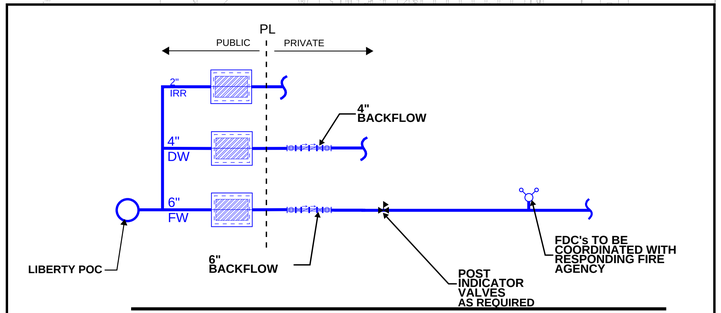
C1.40C

Proposed Domestic and Fire Water



LEGEND

- EXISTING WATER LINE
- 4" OR 6" PROPOSED DOMESTIC WATER LINE
- 6" PROPOSED FIRE WATER LINE
- 6" EXISTING FIRE HYDRANT
- 6" PROPOSED FIRE HYDRANT
- 4" EXISTING FIRE HYDRANT



DETAIL 1 - TYPICAL WATER METER LAYOUT

N

0 25' 50'

SCALE: 1"=50'

CMWC, LLC

Exhibit A

21001.00

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LOS ANGELES, CALIFORNIA 90059

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12248 Santa Monica Blvd.
Los Angeles, CA 90025

ISSUED FOR	DATE
1 SITE PLAN - RESUBMITTAL II	11/05/2025

CHRISTOPHE N. BORNHOFT
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Exp. 3/31/27
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UTILITY PLAN

C1.40D

P:\2021\21001\76 Willowbrook Wellness Ctr North Campus\5 CAD\Sheets\21001\76-C1.40UT.dwg, Nov 07, 2025 - 11:37am



NORTH

CMWC, LLC

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1667 EAST 18TH STREET
LOS ANGELES, CALIFORNIA 90059

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12248 Santa Monica Blvd.
Los Angeles, CA 90025

ISSUED FOR	DATE
1 SITE PLAN - RESUBMITTAL II	11/05/2025

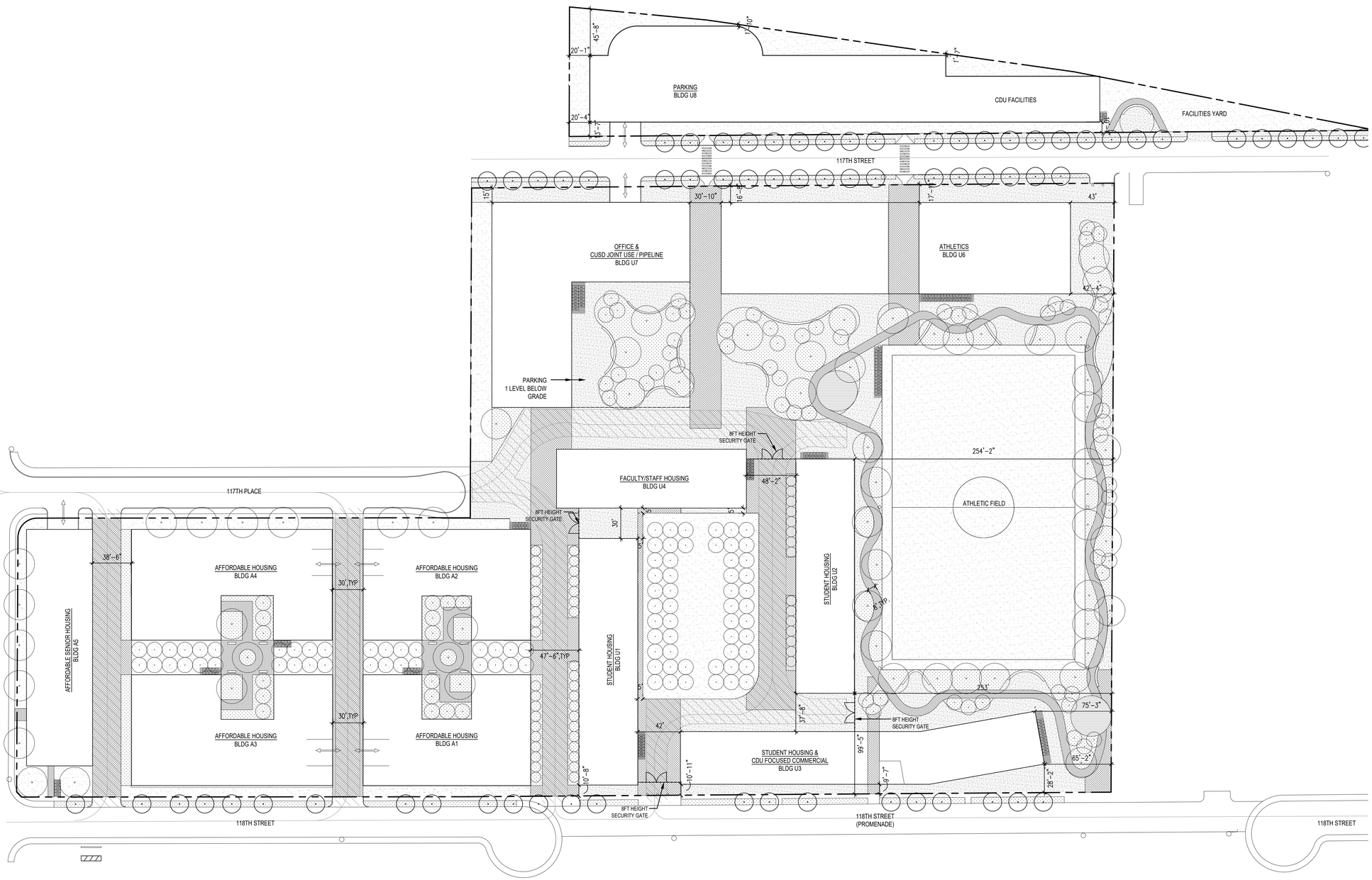
HOOD
LANDSCAPE ARCHITECT
Hood Design Studio, Inc.
3016 Filbert St #2
Oakland, CA 94111
United States
Tel 510.595.0688

ILLUSTRATIVE PLAN

SCALE: NTS

L0-00

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CMWC, LLC

Exhibit A

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12248 Santa Monica Blvd.
Los Angeles, CA 90025

CDU

CENTURY

ISSUED FOR	DATE
1 SITE PLAN - RESUBMITTAL II	11/05/2025

HOOD

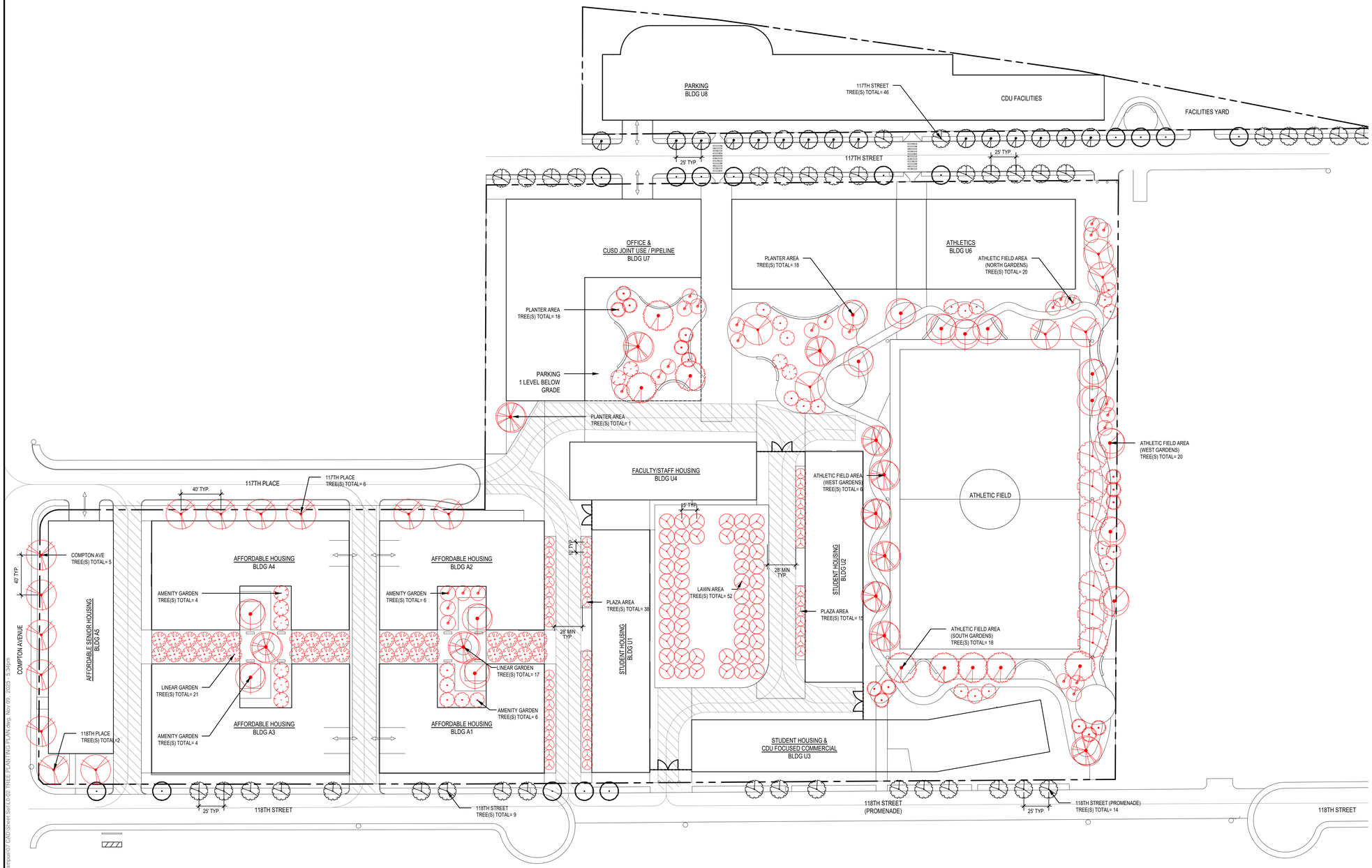
LANDSCAPE ARCHITECT
Hood Design Studio, Inc.
3016 Filbert St #2
Oakland, CA 94111
United States
Tel 510.595.0688

OVERALL SITE PLAN

SCALE: 1" = 50'-0"

L0-01

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TREE REQUIREMENTS DESIGN CRITERIA
ZONING AND PLANNING - LOS ANGELES COUNTY CODE: **TITLE 22 - CHAPTER 22.126.030 - TREE REQUIREMENTS**
SECTION A
(1) (C) NON-RESIDENTIAL OR MIXED-USE, A MINIMUM OF THREE (3) TREES SHALL BE PLANTED FOR EVERY 10,000 SQUARE FEET (SF) OF DEVELOPED LOT AREA
TOTAL SITE AREA: 558,644 SQUARE FEET (SF) = 12.8 ACRES
TREE REQUIREMENTS: PER TOTAL SITE DEVELOPED AREA
#OF TREES REQUIRED / 10,000 SQUARE FEET (SF) = 168 #OF TREES PROVIDED / 10,000 SQUARE FEET (SF) = **277**

LOT AREA TREE(S) SUMMARY (ON-SITE)			
SYMBOL	COMMON NAME	BOTANICAL NAME	QTY
	PERSIAN SILK TREE	ALBIZIA JULIBRISSIN	277
	WHITE ORCHID TREE	BAUHINIA ACULEATA	
	DESERT WILLOW TREE	CHILOPSIS LINEARIS	
	CHINESE FRINGETREE	CHIONANTHUS RETUSUS	
	BRONZE LOQUAT TREE	ERIOBOTRYA DEFLEXA	
	CHINESE FLAME TREE	KOELREUTERIA BIPINNATA	
	BRISBANE BOX TREE	LOPHOSTEMON CONFERTUS	
	SWAN HILL OLIVE	OLEA EUROPAEA 'SWAN HILL'	
	CANARY ISLAND PINE TREE	PINUS CANARIENSIS	
	CALIFORNIA SYCAMORE TREE	PLATANUS RACEMOSA	
	CALIFORNIA BLACK OAK TREE	QUERCUS KELLOGGII	
	AFRICAN SUMAC TREE	SEARSIA LANCEA	

* DENOTES TREE PLANT LIST IN COMPLIANCE WITH CHAPTER 22.126 - TREE PLANTING REQUIREMENTS AND THE APPROVED SPECIES LIST PER LOS ANGELES COUNTY PLANNER.

**ALL TREES WILL BE 15 GALLONS, 0.75" TRUNK CALIPER MINIMUM PER CHAPTER 22.126 -TREE PLANTING REQUIREMENTS.

STREET TREE(S) SUMMARY			
SYMBOL	COMMON NAME	BOTANICAL NAME	QTY
	PINK TRUMPET TREE	HANDROANTHUS HEPTAPHYLLUS	69
	BRISBANE BOX TREE	LOPHOSTEMON CONFERTUS	
	CANARY ISLAND PINE TREE	PINUS CANARIENSIS	

* DENOTES TREE PLANT LIST IN COMPLIANCE WITH WILLOWBROOK TOD SPECIFIC PLAN COUNTY OF LOS ANGELES.

** REFERENCE TABLE 5-1 FOR STREET TREE RECOMMENDED SPACING ALONG SIDEWALKS, PARKWAYS AND ADJACENT LAND USES.

***STREET TREES ON 118TH STREET WERE PLANTED BY COUNTY PER COUNTY IMPROVEMENT PLAN IN 2024.

CMWC, LLC

Exhibit A

1667 EAST 18TH STREET
LOS ANGELES, CALIFORNIA 90059

Frederick Fisher and **Partners**
12248 Santa Monica Blvd.
Los Angeles, CA 90025

ISSUED FOR	DATE
1 SITE PLAN - RESUBMITTAL II	11/05/2025

HOOD
LANDSCAPE ARCHITECT
Hood Design Studio, Inc.
3016 Filbert St #2
Oakland, CA 94111
United States
Tel 510.595.0688

TREE PLANTING PLAN

SCALE: 1" = 50'-0"

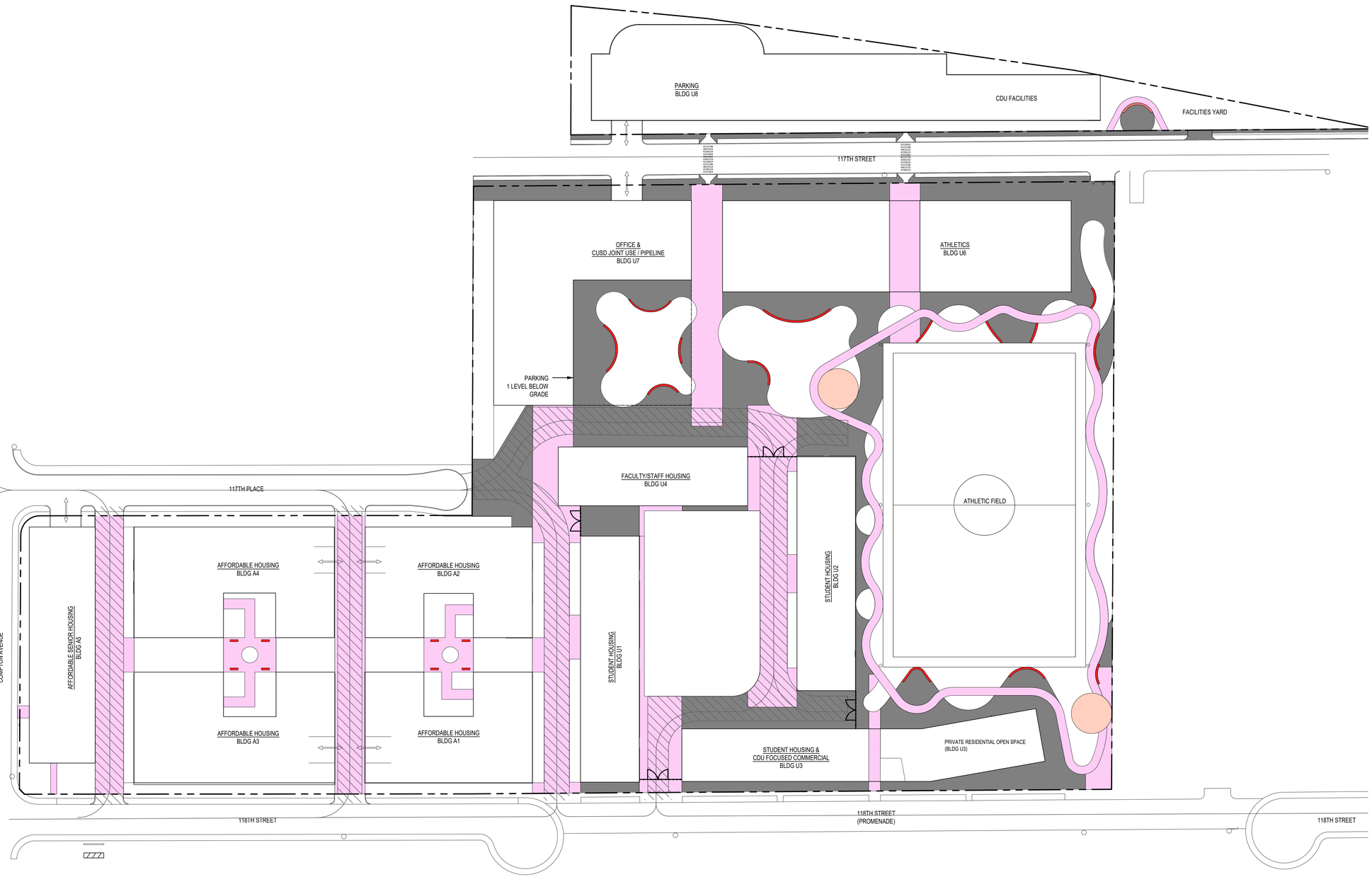
L0-02

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HARDSCAPE SUMMARY		
SYMBOL	COMMON NAME	QTY
	ASPHALT	*EXISTING
	NATURAL CONCRETE PAVING	73,041 SF
	BRICK PAVERS	74,547 SF
	WOOD PLANKS	2,513 SF
	WOOD BENCH	1,303 SF
	APPROX. SQUARE FOOTAGE TOTAL=	151,404 SF

* DENOTES OPEN SPACE HARDSCAPE AREA SQUARE FOOTAGE.

NOTES:
* ALL WALKWAYS SHALL COMPLY WITH ADA REQUIREMENTS.
REFER TO L0-01 FOR DIMENSIONS.



CMWC, LLC

Exhibit A

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Los Angeles, CA 90025

ISSUED FOR	DATE
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LANDSCAPE ARCHITECT
Hood Design Studio, Inc.
3016 Filbert St #2
Oakland, CA 94111
United States
Tel 510.595.0688

MATERIALS PLAN

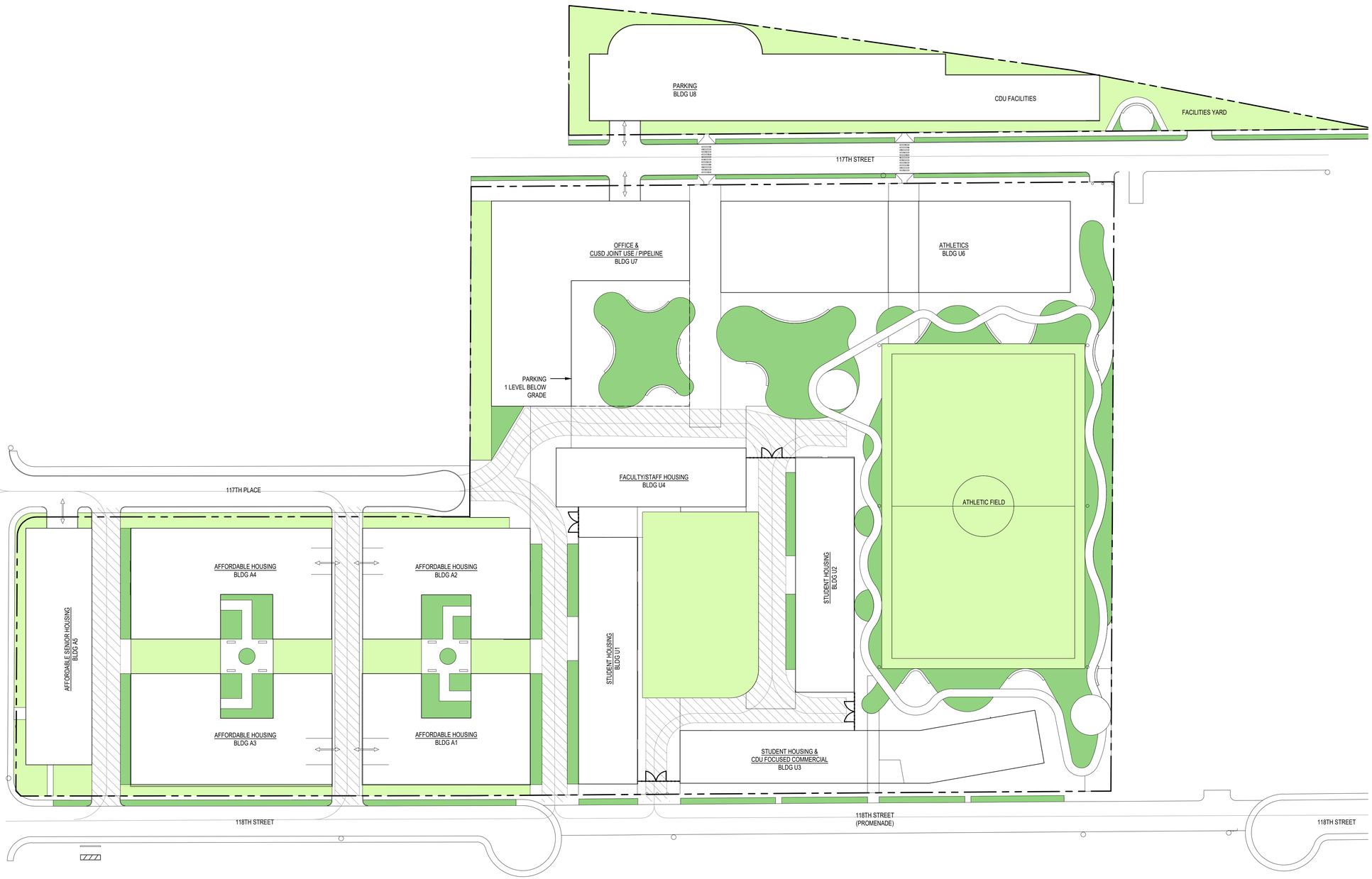
SCALE: 1" = 50'-0"

L0-03

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LANDSCAPE SUMMARY		
SYMBOL	COMMON NAME	QTY
	SHURBS AND GROUNDCOVERS	61,752 SF
	NATURAL GRASS	132,341 SF
	APPROX. SQUARE FOOTAGE TOTAL=	194,093 SF

* DENOTES OPEN SPACE LANDSCAPE AND GRASS AREA SQUARE FOOTAGE.



CMWC, LLC

Exhibit A

1667 EAST 18TH STREET
LOS ANGELES, CALIFORNIA 90059

Frederick Fisher and Partners
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Los Angeles, CA 90025

ISSUED FOR	DATE
1 SITE PLAN - RESUBMITTAL II	11/05/2025

LANDSCAPE ARCHITECT
Hood Design Studio, Inc.
3016 Filbert St #2
Oakland, CA 94111
United States
Tel 510.595.0688

PLANTING PLAN

SCALE: 1" = 50'-0"

L0-04

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Parking: Long-Term (cont'd)

Figure 6: City Bicycle Parking Ordinance Minimum Requirements and Preferred Spacing.
Recommended Bike Rack: Minimum 36 inches tall and 24 inches wide. Racks installed parallel to walls shall be a minimum of 30 inches from the wall.
Bike Space: Minimum 6 feet long and 18 inches wide.
Bike Rack: Minimum 5 feet between rack and curb, walls, fence, automobile parking space, building or street furniture for maneuvering. Racks installed parallel from walls shall be a minimum of 30 inches from the wall.
Bike Lockers Clearance: Minimum 48 inches on the side and 72 inches in front of the lockers is recommended.

Figure 6a: Plan view bike parking space.

Figure 6b: Plan view bike cage

Figure 6c: Plan view bike lockers

Photo courtesy of Studio O+A

Figure 7: Parking on Office Floor
Some companies, such as Yelp, provides bike parking within their office. This can often maximize the perception of security.

Photo courtesy icporches.com

Figure 8: Bicycle Room/Cage
A limited-access room or cage that is surrounded on all sides providing a safe place to leave bicycles for long periods of time.

Photo courtesy of APBP

Figure 9: Two-tiered Parking
Each bike should have a space 2' wide and 6' long. Each tier needs a vertical clearance of 48" (a single-tiered rack needs 96" of clearance).

Photo courtesy of APBP

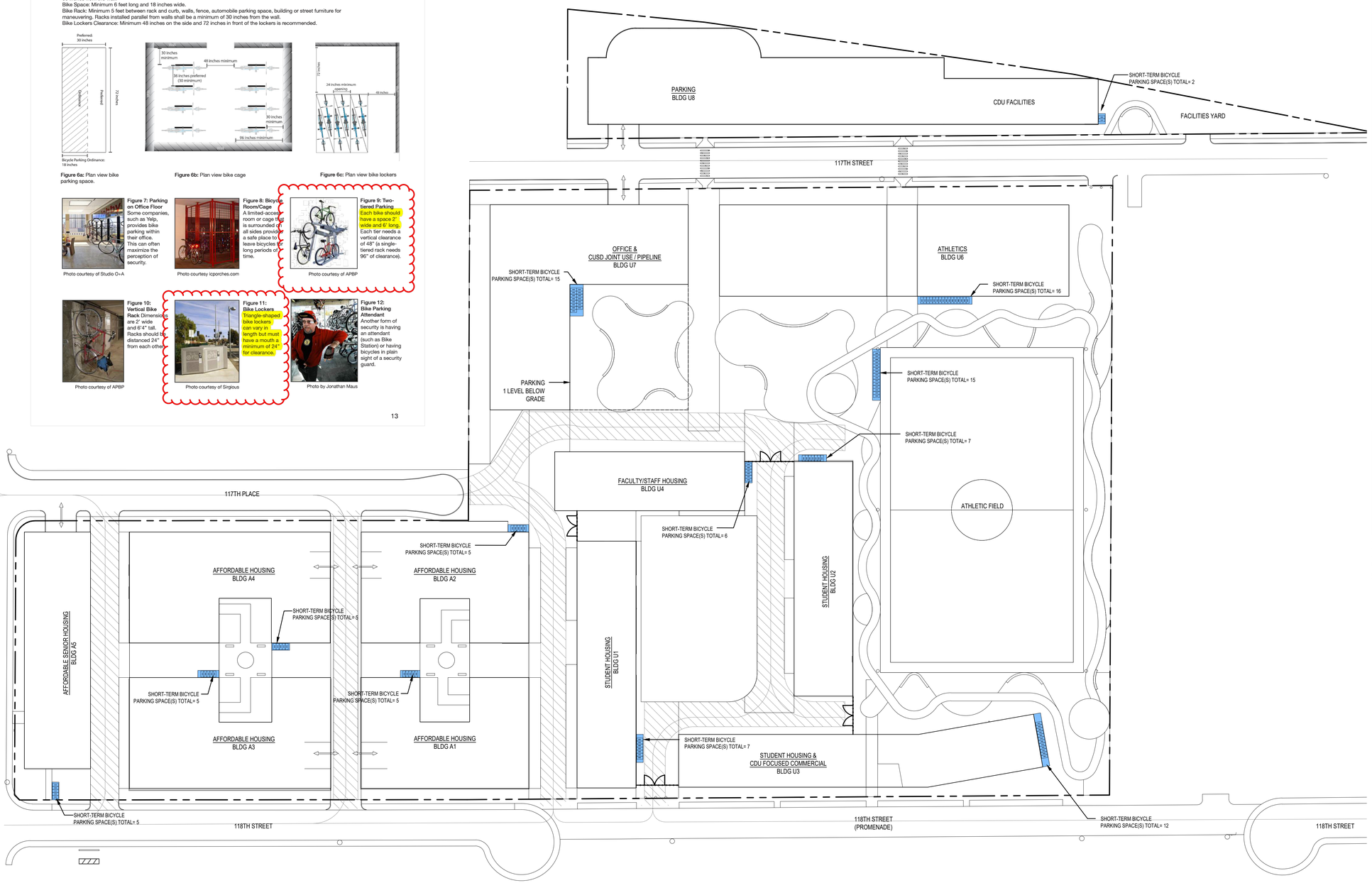
Figure 10: Vertical Bike Rack
Dimensions are 2' wide and 6'4" tall. Racks should be distanced 24"+ from each other.

Photo courtesy of Sirgious

Figure 11: Bike Lockers
Triangle-shaped bike lockers can vary in length but must have a mouth a minimum of 24" for clearance.

Photo by Jonathan Maus

Figure 12: Bike Parking Attendant
Another form of security is having an attendant (such as Bike Station) or having bicycles in plain sight of a security guard.



BICYCLE PARKING SPACES DESIGN CRITERIA

ZONING AND PLANNING - LOS ANGELES COUNTY CODE:
TITLE 22 - TABLE 22.112.100-A - BICYCLE PARKING SPACES AND BICYCLE FACILITIES

SECTION A

REQUIRED BICYCLE PARKING SPACES, PER TABLE 22.112.100-A, MINIMUM NUMBER OF SHORT-TERM AND LONG-TERM BICYCLE PARKING SPACES REQUIRED FOR EACH USE

BICYCLE REQUIREMENTS:
TOTAL # OF SPACES PER DWELLING UNIT OR SQUARE FOOTAGE

SHORT-TERM:

BUILDING USE	NAME	USE	SHORT-TERM QTY	SUM QTY
RESIDENTIAL/ COMMERCIAL	A1	Affordable Housing	5	57
	A2	Affordable Housing	5	
	A3	Affordable Housing	5	
	A4	Affordable Housing	5	
	A5	Affordable Sr. Housing	5	
	U1	Market-rate Student Housing	7	
	U2	Market-rate Student Housing	7	
	U3	Market-rate Student Housing	11	
	U3	Commercial Component	1	
	U4	Market-rate Student Housing	6	
ATHLETICS	U6	Athletics (1,565 Occupant Load)	31	31
OFFICE	U7	Office & CUSD Joint Use	15	17
	U8	Parking Structure / Office	2	

LONG-TERM:

BUILDING USE	LONG-TERM QTY
RESIDENTIAL/ COMMERCIAL	281
ATHLETICS	31
OFFICE	17

TOTAL # OF BICYCLE PARKING SPACES REQUIRED PER SITE BUILDING USE = **434**

BICYCLE PARKING LEGEND

SYMBOL	COMMON NAME	QTY
	SHORT-TERM (BICYCLE PARKING SPACES)	105
	LONG-TERM (BICYCLE PARKING SPACES)	329
	APPROX. REQUIRED NUMBER OF BICYCLE PARKING SPACES=	434

* DENOTES LOCATION(S) REQUIRED FOR SHORT-TERM AND LONG-TERM BICYCLE PARKING SPACES PER BUILDING USE.

** REFERENCE TABLE 22.112.100-A FOR BICYCLE PARKING SPACES REQUIREMENTS FOR RESIDENTIAL, COMMERCIAL, OFFICE AND ATHLETICS BUILDING USE.

NOTES:
* SHOWER FACILITIES SHALL BE PROVIDED AS REQUIRED BY THE COUNTY CODE.

**FOR LONG-TERM BICYCLE PARKING AND BIKE LOCKER LOCATIONS, REFER TO SHEET A1.01.

CMWC, LLC

Exhibit A

1667 EAST 18TH STREET
LOS ANGELES, CALIFORNIA 90059

Frederick Fisher and **Partners**
12248 Santa Monica Blvd.
Los Angeles, CA 90025

CDU — CHARLES R. DREW UNIVERSITY OF MEDICINE AND SCIENCE

CENTURY

ISSUED FOR	DATE
1 SITE PLAN - RESUBMITTAL II	11/05/2025

HOOD

LANDSCAPE ARCHITECT
Hood Design Studio, Inc.
3016 Filbert St #2
Oakland, CA 94111
United States
Tel 510.595.0688

BICYCLE PARKING LAYOUT PLAN

SCALE: 1" = 50'-0"

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AFFORDABLE & SENIOR HOUSING OPEN SPACE (OS)*					
		Private OS		Common OS	
Building	Units	Required (50 sf / du)	Provided (50 sf balconies)	Required (25 sf / du)	Provided (courtyards)
A1	47	2,350	2,350	1,175	1,175
A2	47	2,350	2,350	1,175	1,175
A3	53	2,650	2,650	1,325	1,325
A4	53	2,650	2,650	1,325	1,325
A5 (Senior)**	54	2,700	2,700	1,350	1,350
Total	254	12,700	12,700	6,350	6,350

Open Space ratios provided per Table 3-5 in the Willowbrook TOD Specific Plan.

*** The required common open space for Building A5 will be co-located with the courtyards of Buildings A1-A4.*

STUDENT & FACULTY HOUSING OPEN SPACE (OS)***							
		Private OS		Common OS			
Building	Units	Required (50 sf / du)	Provided	Required (25 sf / du)	Required in lieu of Private OS (50 sf / du)	Total Required (75 sf / du)	Provided (courtyards)
U1	72	**Private OS to be provided via Common OS		1,800	3,600	5,400	5,189
U2	70			1,750	3,500	5,250	5,189
U3	108			2,700	5,400	8,100	5,189
U4 (Faculty)	55	2,750	2,750	1,375	-	1,375	5,189
Total	305	2,750	2,750	7,625	12,500	20,125	20,756

***Per Specific Plan Amendment, required Private Open Space for Student Housing may be provided by adding the equivalent area to Common Open Space.*

NON-RESIDENTIAL COMMON OPEN SPACE		
	Required OS (1000 sf / ac.)	Provided OS
Non-Residential Project Site Area (6.52 ac.)	6,520	10,021

TOTAL SITE LANDSCAPING		
	Required 10% of site	Provided
Total Site Area (12.83 ac)	55,896 sf	166,901

NORTH

CMWC, LLC

Exhibit A

1667 EAST 18TH STREET
LOS ANGELES, CALIFORNIA 90059

Frederick Fisher and **Partners**
12248 Santa Monica Blvd.
Los Angeles, CA 90025

CDU

CENTURY

ISSUED FOR	DATE
1 SITE PLAN - RESUBMITTAL II	11/05/2025

HOOD
LANDSCAPE ARCHITECT
Hood Design Studio, Inc.
3016 Filbert St #2
Oakland, CA 94111
United States
Tel 510.595.0688

OPEN SPACE & LANDSCAPE REQUIREMENTS PLAN

SCALE: 1" = 50'-0"

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Exhibit B

LA COUNTY PLANNING

PROJECT NUMBER
PRJ2023-002770-(2)

HEARING DATE
April 29, 2026

REQUESTED ENTITLEMENT(S)
Specific Plan Amendment No. RPPL2023004093
Development Agreement No. RPPL2023005669
Conditional Use Permit No. RPPL2023004092
Administrative Housing Permit No. RPPL2023004095
Environmental Plan No. RPPL2023004097

PROJECT SUMMARY

OWNER / APPLICANT
Compton Unified School District & LA County Development Authority / CDU / MLK Wellness Collaborative, LLC

MAP/EXHIBIT DATE
November 5, 2025

PROJECT OVERVIEW
An expansion of the Charles Drew University campus consisting of offices, athletics/recreation facilities, a parking structure, university housing including three student housing buildings (250 units), one faculty/staff housing building (55 units), and off-campus, non-university affordable housing in four apartment buildings (up to 200 units) and one affordable senior housing building (up to 54 units).

LOCATION
1667 E. 118th Street, Willowbrook, CA 90059

ACCESS
Compton Ave., E. 117th St., E. 117th Pl., E. 118th St.

ASSESSORS PARCEL NUMBER(S)
6149-014-900, 6149-012-902, 6149-014-903, 6149-014-904, and 6149-014-906

SITE AREA
12.83 Acres

GENERAL PLAN / LOCAL PLAN
Los Angeles County General Plan, Metro Area Plan, Willowbrook Transit Oriented District (TOD) Specific Plan

ZONED DISTRICT
Willowbrook - Enterprise

PLANNING AREA
Metro

LAND USE DESIGNATION
MU (Mixed Use)

ZONE
SP (Specific Plan), MU-2 (Mixed Use 2) per the Specific Plan

PROPOSED UNITS
254 traditional dwelling units (249 affordable)

305 student, staff, and faculty on-campus dwelling units

MAX DENSITY/UNITS
486

APPLICABLE STANDARDS DISTRICT(S)
Willowbrook TOD Specific Plan

ENVIRONMENTAL DETERMINATION (CEQA)
An Addendum to the certified Environmental Impact Report (EIR) for the Willowbrook TOD Specific Plan was prepared in compliance with the California Environmental Quality Act (CEQA) and the County Environmental Guidelines to account for the proposed project. The Addendum concluded that the project as proposed would not result in any increased or additional environmental impacts beyond those which were analyzed in the EIR and therefore concluded that supplemental environmental analysis was not required.

Exhibit B

KEY ISSUES

- Consistency with the Los Angeles County General Plan
- Consistency with the Willowbrook TOD Specific Plan
- Satisfaction of the following portions of Title 22 of the Los Angeles County Code:
    - Chapter 22.112 (Parking)
    - Chapter 22.126 (Tree Planting Requirements)

CASE PLANNER:	PHONE NUMBER:	E-MAIL ADDRESS:
Bryan S. Moller	(213) 974 - 7411	bmoller@planning.lacounty.gov

Exhibit C

LOS ANGELES COUNTY
DEPARTMENT OF REGIONAL PLANNING

FINDINGS OF THE REGIONAL PLANNING COMMISSION
AND ORDER
PROJECT NO. PRJ2023-002770-(2)
SPECIFIC PLAN AMENDMENT NO. RPPL2023004093
DEVELOPMENT AGREEMENT NO. RPPL2023005669
CONDITIONAL USE PERMIT NO. RPPL2023004092
ADMINISTRATIVE HOUSING PERMIT NO. RPPL2023004095
ENVIRONMENTAL PLAN NO. RPPL2023004097

RECITALS

1. **HEARING DATE(S).** The Los Angeles County ("County") Regional Planning Commission ("Commission") conducted a duly-noticed public hearing on April 29, 2026, in the matter of Project No. PRJ2023-002770-(2), consisting of Specific Plan Amendment ("PA") No. RPPL2023004093, Development Agreement ("DA") No. RPPL2023005669, Conditional Use Permit Number ("CUP") No. RPPL2023004092, Ministerial Site Plan Review ("SPR") No. RPPL2024001835, Administrative Housing Permit ("HP") No. RPPL2023004095, and Environmental Plan No. RPPL2023004097. The PA, DA, CUP, SPR, and HP are referred to collectively as the "Project Entitlements."

2. **HEARING PROCEEDINGS.** *Reserved.*

3. **ENTITLEMENT(S) REQUESTED.** The permittee, CDU/MLK Wellness Collaborative, LLC ("Permittee"), requests the Project Entitlements to authorize an expansion of Charles Drew University ("CDU") consisting of university offices, university athletics facilities, student and faculty/staff housing, and non-university related affordable housing; specifically: four affordable multi-family housing buildings (up to 200 units), one affordable senior housing building (up to 54 units), three student housing buildings (250 units), one faculty/staff housing building (55 units), one 116,000 sq. ft. office building, one athletic facilities building, one athletic field, and one eight-story parking structure north of E. 117th Street ("Proposed Project") on a property located at 1667 E. 118th Street, Willowbrook, CA 90059 in the unincorporated community of Willowbrook ("Project Site").

4. **ENTITLEMENT(S) REQUIRED**. A PA to update the Principal Use Regulations and Development Standards of the Willowbrook Transit-Oriented District Specific Plan ("Specific Plan") Mixed Use 1 ("MU-1") and Mixed Use 2 ("MU-2") Zones pursuant to County Code Section 22.180.020 ([Plan Amendments] Applicability). The update to the MU-1 and MU-2 Principal Use Regulations and Development Standards include amendments requested by both the Permittee and County Department of Regional Planning ("LA County Planning") staff ("Staff"). The amendments requested by the Permittee would allow the Proposed Project to be developed while complying with the updated standards. The amendments requested by Staff would bring the standards into consistency with standard practice. The proposed amendments are as follows:

   Permittee Requested Amendments:

1. Adding senior citizen housing as an allowed land use.
2. Adding student and staff housing as an allowed land use.
3. Increasing the building height maximum in the MU-2 Zone from 50 feet to 70 feet and allowing 110 feet for parking structures.
4. Allowing increased common open space to replace the private open space requirement for student housing.
5. Allowing off-site parking for student/staff housing without a Parking Permit.

County Requested Amendments:

1. Removing the building stories limits.
2. Removing dwelling unit floor area minimums.
3. Updating the Wireless Telecommunications Facilities land use reference to reflect current policy.

After deeming the application complete in 2023, the County amended the Specific Plan as a part of the Metro Area Plan effort. This amendment primarily reformatted the Specific Plan. To ensure that both the version of the Specific Plan in effect at the time the application was deemed complete and the current version are kept in sync, the County proposes that both versions of the Specific Plan be amended concurrently.

5. **ENTITLEMENT(S) REQUIRED**. The DA is a request to provide the Permittee with certainty in developing the various components of the Proposed Project over a 30-year time period in exchange for community benefits, including no-cost programing and events, public access to on-campus open spaces and walking paths, public access to the athletics field and facilities, access to meeting spaces for local community groups, and local worker hiring programs, pursuant to County Code Section 22.162.020 ([Development Agreements] Applicability). The DA provides assurance to the Permittee that the applicable regulations for the Project Site will not change within the performance period in exchange for community benefits.

6. **ENTITLEMENT(S) REQUIRED**. The CUP is a request to authorize various university uses (including offices, parking facilities, recreational facilities, and on-campus faculty/staff/student housing) in the Specific Plan MU-2 Zone pursuant to County Code Chapter 22.412 (Willowbrook Transit-Oriented District Specific Plan) Section 3.5 (Mixed Use Zones). The CUP is a requirement of the Specific Plan to ensure that the university uses do not have an adverse impact on the surrounding community.

7. **ENTITLEMENT(S) REQUIRED**. The SPR is a related request to authorize the construction of five multi-family residential buildings in the Specific Plan MU-2 Zone pursuant to County Code Chapter 22.412 (Willowbrook Transit-Oriented District Specific Plan) Section 3.5 (Mixed Use Zones). The purpose of the SPR is to review the non-university affordable housing components of the Proposed Project.

8. **ENTITLEMENT(S) REQUIRED**. The HP is a request to authorize the affordable housing uses and incentives pursuant to State Density Bonus Law and County Code Section 22.166.040 (Administrative Housing Permit).

9. **BOARD OF SUPERVISORS APPROVAL.** The approval of the Project Entitlements will not become effective unless and until the Board of Supervisors has approved the PA and DA, and both have become effective.

10. **PLANNING AREA.** The Project Is located within the Metro Planning Area.

11. **PREVIOUS ENTITLEMENT(S).** Zone Exception Case No. ZEC2828 authorized the construction of a new school with associated fencing on April 19, 1957.

12. **LAND USE DESIGNATION.** The Project Site is located within the MU (Mixed Use) land use category of the General Plan Land Use Policy Map.

13. **ZONING.** The Project Site is located in the Willowbrook-Enterprise Zoned District and is currently zoned Specific Plan MU-2. Pursuant to the Specific Plan Section 3.5 (Mixed Use Zones) Table 3-2 (Principal Use Regulations for Mixed Use Zones), a CUP is required for the university uses and an SPR and HP are required for the non-university related residential uses.

14. **SURROUNDING LAND USES AND ZONING**

LOCATION	GENERAL PLAN LAND USE POLICY	ZONING	EXISTING USES
NORTH	MU	Specific Plan MU-2	Single-family residences, multi-family residences and Interstate 105
EAST	MU	Specific Plan MU-2 and Specific Plan MU-1	Single-family residences, multi-family residences, university uses, and commercial uses
SOUTH	Public and Semi Public (“P”)	Specific Plan Drew Educational	Multi-family residences, educational facilities including Charles Drew University, and

			Martin Luther King Jr. Hospital
WEST	MU, Residential 18 ("H18")	Specific Plan MU-2 and Two-Family Residence ("R-2")	Single-family and multi-family residences

15. **PROJECT AND SITE PLAN DESCRIPTION.**

A. Existing Site Conditions
The Project Site is 12.83 gross acres in size and consists of fifty-seven legal lots. The Project Site is generally irregular in shape with flat topography and is currently undeveloped.

B. Site Access
The Project Site is accessible via E. 117th St. to the north, E. 117th Pl. and Compton Ave. to the west, and E. 118th St. to the south. Primary access to the Project Site will be via an entrance/exit on E. 117th St. Secondary access to the Project Site will be via an entrance/exit on E. 117th Pl., E. 118th St., and Compton Ave. for the non-university residential uses.

C. Site Plan
The site plan depicts the Project Site with 12 new buildings, associated open space and landscaping, and the athletics field. Moving from west to east and south to north across the site plan, the various Proposed Project components are as follows:

Affordable Housing
The affordable housing buildings are clustered on the southwestern portion of the Project Site and consist of buildings A1 – A5. Buildings A1 and A2 are approximately 52,500 sq. ft. each with 24 ground floor parking spaces and 47 dwelling units each; buildings A3 and A4 are approximately 58,700 sq. ft. each with 29 ground floor parking spaces and 49 dwelling units each; and building A5 is approximately 44,100 sq. ft. with 27 ground floor parking spaces and 54 dwelling units. All affordable housing buildings are proposed to be four stories tall. All buildings will be set aside as affordable at lower income (up to 80% Area Median Income ("AMI"). Building A5 will also be set aside as senior housing.

Pedestrian Promenade (E. 118th St.)
A street vacation of a portion of E. 118th St. will create an approximately 700 linear foot pedestrian promenade with landscaping and decorative paving, connecting the existing CDU campus to the south with the proposed expansion to the north and creating an inviting space for both campus and public use. The pedestrian promenade may also host public events such as farmer's markets.

University Housing
To the east of the affordable housing buildings are the four university housing buildings consisting of buildings U1 – U4 encircling an approximately 20,756 sq. ft. open space quad area. Building U1 is approximately 70,500 sq. ft. in size with 72 university student housing units; building U2 is approximately 67,500 sq. ft. in size with 70 university student housing units; building U3 is approximately 95,500 sq. ft. in size with 108 university student housing units, 5,000 sq. ft. of university/community use space, and a 10,270-square-foot university-oriented retail space; and building U4 is approximately 54,750 sq. ft. in size with 55 university faculty/staff housing units.

Athletics Field
To the east/northeast of the university housing buildings is the 100-yard by 60-yard athletics field with associated infrastructure, surrounded by walking paths and landscaping.

University Office Building
To the north of the university housing and west of the athletics field is the approximately 121,000-square-foot, five-story CDU office building. This square footage includes approximately 5,000 sq. ft. of university/community use space. The building has 84 ground floor parking spaces.

Athletics Facilities Building
To the east of the university office building is the approximately 43,100-square-foot, one-story athletics facility building, which contains a swimming pool, a basketball court, exercise rooms, a run/walk path, and support facilities.

Parking Structure
The northernmost building is the eight-story parking structure, which is separated from the rest of the Proposed Project by E. 117th St. The parking structure contains 637 parking spaces with 11,500 sq. ft. of university office and storage uses.

D. Affordable Housing
The Proposed Project will contain up to 249 dwelling units set-aside as affordable up to 80% AMI; of these, up to 53 will be restricted as senior units. All proposed affordable housing units are located in the five buildings clustered on the southwestern portion of the Project Site, with the senior housing in the westernmost building.

E. Parking
The Proposed Project will provide a total of 854 parking spaces. Of those, 637 will be located in the proposed parking structure at the northernmost portion of the Project Site; 84 parking spaces will be located at the university office building, and

133 of the parking spaces will be located on the ground floor of the affordable housing buildings. Two of the affordable housing buildings will contain 24 parking spaces each while the other two affordable housing buildings will contain 29 parking spaces each; the senior affordable housing building will contain 27 parking spaces. While a total of 854 parking spaces are being provided, only 209 of those parking spaces are required for the athletics uses due to the Project Site's proximity to the Metro A and C Line Stations, with the remaining 645 being provided voluntarily.

16. **CEQA DETERMINATION.** An Addendum to the previously certified Final EIR (Environment Assessment Number 201500136 and State Clearinghouse Number 2015101106) was prepared for the Proposed Project in compliance with the California Environmental Quality Act ("CEQA") and the County's environmental guidelines to account for the construction of the Proposed Project within the Specific Plan. The Addendum concluded that the Proposed Project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects beyond those which were analyzed in the EIR and therefore concluded that supplemental environmental analysis was not required. Staff prepared an updated Mitigation Monitoring and Reporting Program ("MMRP") for the Proposed Project.

17. **COMMUNITY OUTREACH.** Prior to the Commission's public hearing on the Proposed Project, the Permittee held two community outreach meetings. The first meeting was held in-person on July 19, 2022, and the second was held virtually on August 30, 2022. Community members expressed their wants/needs from the Proposed Project, which included: community programming, access to outdoor areas to de-stress and exercise safely, and affordable housing. Outreach to other interested parties, such as local elected officials, schools, and non-profits has been on going from 2022 to the present.

18. **PUBLIC COMMENTS.** Prior to the publication of the Report to the Commission dated April 16, 2026, Staff did not receive any comments related to the Proposed Project.

19. **AGENCY RECOMMENDATIONS.**

    A. County Department of Public Works: Recommended clearance to public hearing with conditions in a letter dated January 15, 2026.

    B. County Fire Department: Recommended clearance to public hearing with conditions in a letter dated December 17, 2025.

20. **LEGAL NOTIFICATION.** Pursuant to County Code Section 22.222.120 (Public Hearing Procedure), the community was properly notified of the public hearing by mail, newspaper [Los Angeles Sentinel], and property posting. Additionally, the Proposed

Project was noticed, and case materials were available on LA County Planning's website. On March 17, 2026, a total of 146 Notices of Public Hearing were mailed to all property owners as identified on the County Assessor's record within a 500-foot radius from the Project Site, as well as eight notices to those on the courtesy mailing list for the Willowbrook-Enterprise Zoned District and to any additional interested parties.

GENERAL PLAN CONSISTENCY FINDINGS

21. **LAND USE POLICY.** The Commission finds that the Proposed Project is consistent with the intended use of the MU land use designation. The MU land use designation generally allows residential, office, and commercial uses at a density of up to 150 dwelling units per acre. The Proposed Project includes residential, university office, and commercial uses. The residential units do not exceed 150 dwelling units per acre.

22. **GOALS AND POLICIES.** The Commission finds that the Proposed Project is consistent with the following goals and policies:

General Plan

Land Use Element

- *Goal LU 4: Infill development and redevelopment that strengthens and enhances communities.*
  - *Policy LU 4.1: Encourage infill development in urban and suburban areas on vacant, underutilized, and/or brownfield sites.*

  The Project Site is a large, 12.83-acre, vacant site in a highly urbanized area of the County. The Proposed Project will fully utilize the vacant Project Site by expanding the CDU campus and providing non-university affordable housing for the broader community while enhancing the community through the provision of new housing options, expanded recreation and social opportunities through CDU, and economic development activities stemming from construction work and university jobs.

- *Goal LU 10: Well-designed and healthy places that support a diversity of built environments.*
  - *Policy LU 10.7: Promote public spaces, such as plazas that enhance the pedestrian environment, and, where appropriate, continuity along commercial corridors with active transportation activities.*
  - *Policy LU 10.9: Encourage land uses and design that stimulate positive and productive human relations and foster the achievement of community goal.*
  - *Policy LU 10.11: Facilitate the use of streets as public space for activities that promote civic engagement, such as farmers markets, parades, etc.*

The Proposed Project will be an open campus without gates that will allow the community to access its privately maintained walking paths and open space during daytime hours, giving the public both a midblock crossing through the Project Site and an area to be able to relax or workout. The pedestrian promenade on E. 118th St. is also proposed as a car-free space for pedestrians which will host farmers markets and other community-friendly events. Furthermore, the Project Site is envisioned as a primarily car free area with landscaping, walking paths, and other open space areas throughout the site.

Economic Development Element

- *Goal ED 4: Enhanced revitalization activities.*
  - *Policy ED 4.4: Incentivize infill development in urban and suburban areas that revitalizes underutilized commercial and industrial areas.*
  - *Policy ED 4.5: Direct resources to economically distressed areas to spur revitalization activities.*
  - *Policy ED 4.6: Retrofit and reuse vacant and underutilized industrial and commercial sites in urban and suburban areas for emerging and targeted industries.*

The Project Site is a large, 12.83-acre, vacant site in a highly urbanized, non-high-income, area of the County. The Proposed Project will add resources, including jobs, housing, expanded university facilities and services, and recreational amenities, to an economically distressed community.

Housing Element

- *Goal 2: Communities with equitable access to employment opportunities, community facilities and services, and amenities.*
  - *Policy 2.1: Support the development of housing for acutely low, extremely low, very low-, low-, and moderate-income households and those with special needs near employment, transit, services, and other community amenities and facilities such as parks.*
  - *Policy 2.2: Encourage multifamily residential and mixed-use developments along major commercial and transportation corridors.*

The Proposed Project will place up to 249 units of affordable housing for lower income (up to 80% AMI) households in close proximity to employment centers like CDU and Martin Luther King Jr. Hospital. Furthermore, the proposed affordable housing is located less than 0.5-mile west from a major neighborhood commercial center, the Kenneth Hahn Plaza Shopping Center, which contains a grocery store, library, and other commercial establishments. In addition, the Proposed Project

places affordable housing within a 0.5-mile of the Willowbrook-Rosa Parks Metro Rail Station.

Specific Plan

- *Goal 1: Preserve and enhance the character of the Willowbrook community.*
  - *Policy 1.5: Facilitate the expansion of the MLK Medical Center and CDU campus that is compatible and sensitive to the surrounding neighborhoods*
  - *Policy 1.6: Coordinate with CDU to integrate the planned growth of the University's campus with the surrounding community, including creating pedestrian linkages and open space connections with other area institutions and the Willowbrook/Rosa Parks Station.*

  The existing neighborhood is characterized by the same uses that comprise the Proposed Project, including multi-family residences and university uses. While the Proposed Project buildings are generally taller than the surrounding buildings, the design considered sensitivity to the neighborhood by complying with setbacks from the property lines; additionally, the largest building was placed on the northern portion of the Project Site, abutting Interstate 105 and thereby providing a buffer between the neighborhood and the noise and pollution of Interstate 105. The combination of the 118th St. pedestrian promenade and being an open campus with walking paths will provide mid-block pedestrian connectivity to the neighborhood and access to open space.

- *Goal 4: Provide affordable housing opportunities.*
  - *Policy 4.1: Preserve existing stock of affordable housing.*
  - *Policy 4.2: Promote housing affordability through diversification of housing choices (ownership, rental, single-family, multi-family) for varied income groups.*

  The Proposed Project preserves the existing stock of housing by building on a vacant parcel and providing both affordable housing and student/faculty/staff housing, thereby adding to the existing stock while potentially alleviating overcrowding. Additionally, providing both affordable housing at or below 80% AMI and student/faculty/staff housing will provide housing for various income groups.

- *Goal 6: Improve quality of life for existing residents with improvements to the public realm.*
  - *Policy 6.1: Enhance the public realm with street trees, street furniture, bicycle facilities, sidewalks and pedestrian paths.*
  - *Policy 6.4: Encourage outdoor dining and seating areas and other pedestrian-friendly uses in mixed use areas.*

- *Policy 6.6: Require new development to provide public open space as a community benefit, as appropriate. Consider providing incentives to developers for such provisions.*

The Proposed Project will leave the campus open without gates, thereby providing mid-block pedestrian connectivity between E. 117th St. and E. 118th St. for the neighborhood. During daylight hours, the public will have access to privately maintained open space and walking paths. Additionally, the street vacation at 118th St. will create a pedestrian promenade that will provide car-free safe connection for the neighborhood, with the Permittee taking responsibility for maintaining the promenade itself, existing street trees, and irrigation equipment.

- *Goal 7: Improve economic vitality and employment opportunities.*
  - *Policy 7.1: Create economic opportunities for the Willowbrook community by fostering a complementary variety of employment, retail, residential, and institutional uses.*
  - *Policy 7.5: Efficiently manage the supply and demand of parking to accommodate customer, commuter, and resident parking and encourage the use of shared parking where possible.*

The Proposed Project's expansion of the university (institutional and residential uses) along with the non-university affordable housing (residential use) will provide employment opportunities both during the construction and operational phases of the development. The inclusion of the 637-space parking garage would provide ample opportunity for faculty, staff, and students to park on campus, preventing on-street parking competition resulting from project buildout and leaving existing street parking unimpacted.

ZONING CODE CONSISTENCY FINDINGS

23. **PERMITTED USE IN ZONE.** The Commission finds that the Proposed Project is consistent with the MU-2 zoning classification as university uses are permitted in such zone with approval of a CUP and residential uses are permitted in such zone with an SPR pursuant to County Code Chapter 22.412 (Willowbrook Transit-Oriented Specific Plan) Section 3.5 (Mixed Use Zones).

24. **REQUIRED YARDS.** The Commission finds that the Proposed Project is not consistent with the standards identified in County Code Chapter 22.412 (Willowbrook Transit-Oriented Specific Plan) Section 3.5 (Mixed Use Zones). The required setbacks are as follows: 10 ft. setback from E. 117th St., E. 117th Pl., and E. 118th St., 15 ft. setback from Compton Ave., and 20 ft. side/rear setback when adjacent to residential uses. At the closest point, the Proposed Project has a 10 ft. – 4 in. setback from E. 118th St., a 11 ft. – 5 in. setback from E. 117th Pl., and a 12 ft. – 10 in. setback from E. 118th St.; a 9

ft. – 4 in. setback from Compton Ave.; and a 20 ft. –7 in. setback from an adjacent residential use. While the Proposed Project is not consistent with the Compton Ave. setback requirement, an incentive is requested for the reduction pursuant to County Code Chapter 22.120 (Density Bonus) Section 22.120.050 (Affordable Housing). Therefore, with the incentive request the Proposed Project is consistent with setback requirements.

25. **HEIGHT.** The Commission finds that the Proposed Project is not consistent with the standard identified in County Code Chapter 22.412 (Willowbrook Transit-Oriented Specific Plan) Section 3.5 (Mixed Use Zones). The building height maximum in the MU-2 Zone is 50 ft. and four stories. The Proposed Project's building heights reach a maximum of 73 ft. and five stories for the office building and a maximum of 108 ft. and 7 in. and eight stories for the parking garage. While the Proposed Project is not consistent with the maximum height regulation, the proposed PA would increase the maximum heights to 73 ft. with no story maximum for non-parking structures and 110 ft. with no story maximum for parking structures; with the adoption of the requested PA the Proposed Project is consistent with height requirements.

26. **FLOOR AREA RATIO (FAR).** The Commission finds that the Proposed Project is consistent with the standard identified in County Code Chapter 22.412 (Willowbrook Transit-Oriented Specific Plan) Section 3.5 (Mixed Use Zones). The maximum FAR for the Project Site is 3.0. The Proposed Project has an FAR of 1.792.

27. **RESIDENTIAL DENSITY.** The Commission finds that the Proposed Project is consistent with the standard identified in County Code Chapter 22.412 (Willowbrook Transit-Oriented Specific Plan) Section 3.5 (Mixed Use Zones). The maximum density for the Project Site is 150 dwelling units per acre for a total of 486 baseline dwelling units. The Proposed Project has a total of up to 254 units.

28. **PARKING.** The Commission finds that the Proposed Project is consistent with the standard identified in County Code Chapter 22.112 (Parking) Section 22.112.070 (Required Parking Spaces). The Proposed Project includes a total of 854 parking spaces, but only 209 of those parking spaces are required for the athletics uses while the remaining 645 are being provided voluntarily.

29. **NON-RESIDENTIAL COMMON OPEN SPACE AREA.** The Commission finds that the Proposed Project is consistent with the standard identified in County Code Chapter 22.412 (Willowbrook Transit-Oriented Specific Plan) Section 3.5 (Mixed Use Zones). The required minimum non-residential common open space for the Proposed Project is 1,000 sq. ft. per acre for a total of 6,520 sq. ft. The Proposed Project provides 10,021 sq. ft.

30. **RESIDENTIAL COMMON OPEN SPACE AREA.** The Commission finds that the Proposed Project is consistent with the standard identified in County Code Chapter 22.412 (Willowbrook Transit-Oriented Specific Plan) Section 3.5 (Mixed Use Zones). The required minimum residential common open space for the Proposed Project is 50 sq. ft. per dwelling unit for at least 50% of the units for a total of 13,975 sq. ft. The Proposed Project provides 27,106 sq. ft. of residential common open space area.

31. **RESIDENTIAL PRIVATE OPEN SPACE AREA.** The Commission finds that the Proposed Project is not consistent with the standard identified in County Code Chapter 22.412 (Willowbrook Transit-Oriented Specific Plan) Section 3.5 (Mixed Use Zones). The required minimum residential private open space for the Proposed Project is 50 sq. ft. per dwelling unit for a total of 27,950 sq. ft. The Proposed Project provides 15,450 sq. ft. of residential private open space area. While the Proposed Project is not consistent with the minimum residential private open space area, the proposed PA would amend the Specific Plan to allow increased common open space at 75 sq. ft. per dwelling unit in place of the residential private open space area requirement for student housing; with the PA the Proposed Project is consistent.

32. **RESIDENTIAL FLOOR AREAS.** The Commission finds that the Proposed Project is not consistent with the standard identified in County Code Chapter 22.412 (Willowbrook Transit-Oriented Specific Plan) Section 3.5 (Mixed Use Zones). The Specific Plan requires minimum dwelling unit floor areas ranging from 500 sq. ft. for an efficiency unit to 1,100 sq. ft. for a three-bedroom unit. The Permittee requested to modify the minimum requirements as part of the PA. However, Staff recommended that the minimum be removed altogether to align the Specific Plan with the County's current housing policy, which does not dictate minimum/maximum unit sizes. With the PA the Proposed Project is consistent.

33. **BUILDING HEIGHT ADJACENT TO RESIDENTIAL ZONE OR USE.** The Commission finds that the Proposed Project is not consistent with the standards identified in County Code Chapter 22.412 (Willowbrook Transit-Oriented Specific Plan) Section 3.5 (Mixed Use Zones). Along Compton Ave. within the MU-2 Zone, new developments must step back the fourth story to a minimum of 10 ft. The Proposed Project will not include the fourth story step back. While the Proposed Project is not consistent with the Compton Ave. building setback, an incentive is requested for the removal pursuant to County Code Chapter 22.120 (Density Bonus) Section 22.120.050 (Affordable Housing). Therefore, with the incentive request the Proposed Project is consistent.

34. **MINIMUM TRANSPARENCY REQUIREMENTS.** The Commission finds that the Proposed Project is consistent with the standards identified in County Code Chapter 22.412 (Willowbrook Transit-Oriented Specific Plan) Section 3.5 (Mixed Use Zones).

The conceptual site plan includes notes that the minimum transparency of 50% of street level facades will be provided.

35. **SITE LANDSCAPING.** The Commission finds that the Proposed Project is consistent with the standards identified in County Code Chapter 22.412 (Willowbrook Transit-Oriented Specific Plan) Section 3.5 (Mixed Use Zones). A minimum of 10% of the Project Site, 55,887.48 sq. ft., is required to be landscaped with trees, ground cover, shrubbery, and flowers. The Proposed Project includes 166,901 sq. ft. of landscaping.

36. **TREE PLANTING.** The Commission finds that the Proposed Project is consistent with the standards identified in County Code Chapter 22.126 (Tree Planting Requirements) Section 22.126.030 (Tree Requirements). The minimum number of trees required for the Proposed Project is one tree for every 5,000 sq. ft. of building footprint per lot or 168 trees. The Proposed Project includes 277 trees.

37. **PEDESTRIAN CIRCULATION.** The Commission finds that the Proposed Project is consistent with the standards identified in County Code Chapter 22.412 (Willowbrook Transit-Oriented Specific Plan) Section 3.5 (Mixed Use Zones). Pedestrian walkways are required to be a minimum of four ft. wide. The Proposed Project's narrowest pedestrian walkway is four ft. wide.

38. **INCLUSIONARY UNITS.** The Commission finds that the Proposed Project is exempt from the Inclusionary Zoning Ordinance because the Project Site is located within a submarket area that does not require inclusionary housing.

NO NET LOSS FINDINGS

39. Pursuant to California Government Code Section 65863(b)(2), the Commission finds the following:
    a. The Project Site or a portion thereof was identified in the Revised County Housing Element (2021-2029) ("Housing Element") as an adequate site to accommodate a portion of the County's share of the regional housing need;
    b. The estimated capacity on the Project Site was as follows:
        i. Very Low Income: 126 units
        ii. Low Income: 126 units
        iii. Moderate Income: 0 units
        iv. Above Moderate Income: 70 units;
    c. This grant results in a decrease of 126 Very Low Income units and a decrease of 70 Above Moderate Income units; and
    d. Based on the County's monitoring of the remaining unmet need for its share of the regional housing need at each income level, as of the date of this approval, the County's surplus capacity to accommodate its share of the regional housing need is as follows:

i. Very Low Income: 151 units
ii. Low Income: 1,319 units
iii. Moderate Income: 32 units
iv. Above Moderate Income: 7,582 units.

Therefore, supported by the aforementioned substantial evidence, the Commission finds that the remaining sites identified in the Housing Element are adequate to meet the requirements of California Government Code Section 65583.2 and to accommodate the County's share of the regional housing need pursuant to California Government Code Section 65584.

PA FINDINGS

40. **The Commission finds that the amendment is consistent with the adjacent area.** The Proposed Project amends the Specific Plan by adding senior citizen housing and student and staff housing as allowed land uses, increasing building heights, allowing private open space to replace common open space, removing building story limits, and removing floor area minimums. The adjacent area is composed of single-family and multi-family residences, and university uses at varying heights and sizes; the Proposed Project will expand upon the existing land uses and development pattern already present in the community.

41. **The Commission finds that the amendment is consistent with the principles of the Specific Plan.** The principles of the Specific Plan include but are not limited to: preserving and enhancing the character of the Willowbrook community, providing affordable housing opportunities, improving quality of life for existing residents with improvement in the public realm, and improving economic vitality and employment opportunities. The Proposed Project includes the expansion of land uses (residential and university uses) which already exist in the community. The university expansion will improve the quality of life for residents by providing them with access to open space during daylight hours. The construction and operation of the development will increase the economic vitality of the neighborhood, providing new employment opportunities for the community.

42. **The Commission finds that the amendment will be in the interest of public health, safety, and general welfare.** The Proposed Project will develop vacant parcels with university uses and affordable housing, both of which will enhance the general welfare of the existing neighborhood by increasing the housing stock and creating new jobs during both the construction and operation phases of the development. Furthermore, the Proposed Project provides privately maintained open space, increasing the community's access to outdoor opportunities in a safe environment.

43. **The Commission finds that amendment is consistent with other applicable provisions of Title 22.** The PA is only amending portions of the Specific Plan that are not related to Title 22. Applicable Title 22 regulations such as Tree Planting Requirements and Parking will still be applicable, and the Proposed Project complies with those requirements.

DA FINDINGS

44. **The Commission finds that the proposed DA is consistent with the General Plan and any applicable Community, Area, or Specific Plan.** The proposed DA does not propose to amend any applicable General Plan or Specific Plan goals, policies, or regulations; instead, the DA is promoting the goals, policies and regulations of the General Plan and Specific Plan by securing items such as delineated access to the campus by the community and general public.

45. **The Commission finds that the proposed DA complies with zoning, subdivision, and other applicable ordinances and regulations.** The DA does not propose to amend any applicable zoning regulations; instead, it builds upon required regulations such as requiring that affordable housing be affordable for 99 years instead of the otherwise required 55 years.

46. **The Commission finds that the proposed DA is consistent with the public safety, welfare, and convenience, making it in the public interest to enter into the DA with the applicant.** Along with the increase in housing stock, affordable housing, and student/faculty/staff housing, the DA provides delineated benefits for the community such as local hiring programs, daytime public access to the CDU campus, access to the athletics field and facilities, and public meeting spaces for organizations. It is therefore in the public interest to enter into the DA with the Permittee.

47. **The Commission finds that the proposed DA will not: Adversely affect the health, peace, comfort, or welfare of persons residing or working in the surrounding area; be materially detrimental to the use, enjoyment, or valuation of property of other persons located in the vicinity of the site; or Jeopardize, endanger, or otherwise constitute a menace to the public health, safety, or general welfare.** The DA provides delineated benefits for the community such as daytime public access to the CDU campus, access to the athletics field and facilities, and public meeting spaces for organizations. Additionally, the DA ensures that development of the Proposed Project will provide a construction and operation schedule that complies with the CEQA Addendum requirements.

CONDITIONAL USE PERMIT FINDINGS

48. **The Commission finds that the proposed use at the site will be consistent with the adopted General Plan for the area.** The MU General Plan land use category is intended for mixed use developments, including residential, office, and commercial uses, which are all uses that are part of the Proposed Project. The Specific Plan allows university uses with a CUP in the MU-2 Zone as well as a variety of uses such as residential, office, and commercial uses. The Specific Plan intended for the university to have enough space to develop and expand as necessary with the purpose of the CUP being to harmonize all proposed uses through additional review and conditions.

49. **The Commission finds that the proposed use at the site will not adversely affect the health, peace, comfort, or welfare of persons residing or working in the surrounding area; will not be materially detrimental to the use, enjoyment, or valuation of property of other persons located in the vicinity of the site; and will not jeopardize, endanger, or otherwise constitute a menace to the public health, safety, or general welfare.** The Proposed Project is to be developed on a vacant site in an urbanized area and proposes university uses and a non-university affordable housing component. Both uses reflect the current land use mix in the surrounding area. The design of the Proposed Project avoids impacts to the surrounding neighborhood by clustering the less impactful uses, such as offices and housing, adjacent to existing residential development and by locating the potentially more impactful uses, such as the athletics facilities, next to the existing university. Additionally, the Proposed Project includes ample parking to reduce parking impacts to the community. The Proposed Project will connect the community through an open campus concept, allowing privately maintained spaces to be open to the public, which will further enhance the community's ability to enjoy their community.

50. **The Commission finds that the proposed site is adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping and other development features prescribed in Title 22, or as is otherwise required in order to integrate said use with the uses in the surrounding area.** As a large, 12.83-acre, vacant site, the Project Site is of a size that allows the Proposed Project to meet all requirements related to development features as prescribed in Title 22 (or as proposed to be amended). The Permittee ensured that the 20 ft. side yard setback requirement where the Proposed Project abuts existing residential development was met, as the Proposed Project's office building is taller than the existing community's mostly two-story buildings. The setbacks, right-of-way separation, and landscaping integrate the Proposed Project with the surrounding area. The Proposed Project also provides far more parking than is required and includes a significant amount of landscaping and open space areas beyond what is required.

51. **The Commission finds that the proposed site is adequately served by highways or streets of sufficient width and improved as necessary to carry the kind and**

quantity of traffic such use would generate, and by other public or private service facilities as are required. Most the Proposed Project's 854 parking spaces are concentrated on E. 117th St. with 637 parking spaces at the parking garage and 84 parking spaces at the office building. E. 117th St. is a local street directly served by Compton Ave., which is classified as a Secondary Highway by the Master Plan of Highways. Additionally, through its connection with another local street (E. 118th St.), E. 117th St. is also connected to Wilmington Ave., which is classified as a Major Highway by the Master Plan of Highways. The remaining 133 parking spaces are located at the affordable housing cluster at the southwestern portion of the Project Site, and they are served by E. 117th Pl. and E. 118th St., which are both local streets directly connected to Compton Ave. and Wilmington Ave. respectively. The County Department of Public Works did not require any additional street improvements to accommodate anticipated traffic because the CEQA analysis showed that no new impacts to traffic are anticipated. Lastly, alternative transportation through the Metro A and C lines, which are less than a half mile away from the Project Site, provides additional transportation facilities for the university students, faculty, and staff.

52. The Commission finds that to ensure appropriate development of the Proposed Project, it is necessary to tie the CUP grant term to the DA. Specifically, the CUP shall expire if the DA is revoked due to non-compliance. Otherwise, the CUP shall remain in full force and effect until such time as the university ceases operation or the portion of the Project Site occupied by the expanded university uses is redeveloped.

HP FINDINGS

53. The Commission finds that the application meets all the requirements for an HP. The Proposed Project is an expansion of CDU consisting of offices, athletics/recreation facilities, a parking structure, university housing including three student housing buildings (250 units), one faculty/staff housing building (55 units), and off-campus, non-university affordable housing in four apartment buildings (up to 200 units) and one affordable senior housing building (up to 54 units). The HP allows for a waiver removing the required fourth floor step back for the senior housing building and a waiver reducing the required 15-foot setback from Compton Ave. to a 9-foot setback, in exchange for providing 249 affordable units as part of the Proposed Project. The units will be covenanted as affordable units for 99 years pursuant to the DA.

ENVIRONMENTAL FINDINGS

54. The Commission finds that the Addendum to the previously certified EIR for the Proposed Project was prepared in accordance with CEQA, the State CEQA Guidelines, and the County's Environmental Document Reporting Procedures and Guidelines. The Commission reviewed and considered the Addendum, and its associated MMRP, along with the Final EIR and Findings of Fact, and finds that they

reflect the independent judgment of Commission. The Findings of Fact are incorporated herein by this reference, as set forth in full.

55. The Commission finds that the MMRP for the Proposed Project is consistent with the conclusions and recommendations of the Final EIR and that the MMRP's requirements are incorporated into the conditions of approval for the Proposed Project.

56. The Commission finds that the MMRP, prepared in conjunction with the Final EIR, identifies in detail how compliance with its measures will mitigate or avoid potential adverse impacts to the environment from the Project.

57. The Commission finds that the MMRP, prepared in conjunction with the Addendum to the previously certified Final EIR, identifies in detail how compliance with its measures will mitigate or avoid potential adverse impacts on the environment from the Proposed Project. The Commission further finds that the MMRP's requirements are incorporated into the conditions of approval for this Project, and that approval of this Proposed Project is conditioned on the Permittee's compliance with the attached conditions of approval and MMRP.

ADMINISTRATIVE FINDINGS

58. **PUBLIC MEETINGS.** The Commission finds that pursuant to SB 330 (The Housing Crisis Act), the number of publicly held meetings does not exceed the five-meeting limit. One meeting occurred on the following date:

- Commission Hearing held on April 29, 2026.

59. **LOCATION OF DOCUMENTS.** The location of the documents and other materials constituting the record of proceedings upon which the Commission's decision is based in this matter is at LA County Planning, 13th Floor, Hall of Records, 320 West Temple Street, Los Angeles, California 90012. The custodian of such documents and materials shall be the Section Head of the Operations & Major Projects Section, LA County Planning.

BASED ON THE FOREGOING, THE REGIONAL PLANNING COMMISSION CONCLUDES THAT:

Regarding the PA:

A. The amendment is consistent with the adjacent area.

B. The amendment is consistent with the principles of the General Plan.

C. Approval of the amendment will be in the interest of public health, safety, and general welfare.

D. The amendment is consistent with other applicable provisions of this Title 22.

Regarding the DA:

A. The proposed DA is consistent with the General Plan and any applicable Community, Area, or Specific Plan.

B. The proposed DA complies with zoning, subdivision, and other applicable ordinances and regulations.

C. The proposed DA is consistent with the public safety, welfare, and convenience, making it in the public interest to enter into the DA with the applicant.

D. The proposed DA will not: Adversely affect the health, peace, comfort, or welfare of persons residing or working in the surrounding area; be materially detrimental to the use, enjoyment, or valuation of property of other persons located in the vicinity of the site; or Jeopardize, endanger, or otherwise constitute a menace to the public health, safety, or general welfare.

Regarding the CUP:

E. The proposed use will be consistent with the adopted General Plan for the area.

F. The requested use at the location proposed will not: adversely affect the health, peace, comfort, or welfare of persons residing or working in the surrounding area; will not be materially detrimental to the use, enjoyment, or valuation of property of other persons located in the vicinity of the site; and will not jeopardize, endanger, or otherwise constitute a menace to the public health, safety, or general welfare.

G. The proposed site is adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping, and other development features prescribed in this Title 22, or as is otherwise required to integrate said use with the uses in the surrounding area.

H. The proposed site is adequately served by highways or streets of sufficient width and improved as necessary to carry the kind and quantity of traffic such use would generate, and by other public or private service facilities as are required.

Regarding the HP:

I. The application meets all the requirements for an HP.

THEREFORE, THE REGIONAL PLANNING COMMISSION:

1. Having considered the Addendum along with the certified Final EIR (Environmental Plan No. RPPL2023004097) for the Proposed Project, hereby approves the Addendum and finds that none of the conditions described in CEQA Guidelines Section 15162 calling for the preparation of a subsequent EIR have occurred.

2. Recommends that the Board of Supervisors approve **PA No. RPPL2023004093, DA No. RPPL2023005669, CUP No. RPPL2023004092, and HP No. RPPL2023004097,** subject to the attached conditions as applicable.

ACTION DATE: April 29, 2026

MG:KAF:BSM

4/16/2026

cc: Each Commissioner, Zoning Enforcement, Building and Safety

Exhibit D

LOS ANGELES COUNTY
DEPARTMENT OF REGIONAL PLANNING

DRAFT CONDITIONS OF APPROVAL
PROJECT NO. PRJ2023-002770-(2)
CONDITIONAL USE PERMIT NO. RPPL2023004092
ENVIRONMENTAL PLAN NO. RPPL2023004097

PROJECT DESCRIPTION

The project is an expansion of Charles Drew University consisting of university offices, university athletics facilities, student and faculty/staff housing, a street vacation, and non-university related affordable housing subject to the following conditions of approval:

GENERAL CONDITIONS

1. **Permittee**. Unless otherwise apparent from the context, the term “Permittee” shall include the applicant, owner of the property, and any other person, corporation, or other entity making use of this grant.

2. **Affidavit of Acceptance**. This grant shall not be effective for any purpose until the Permittee, and the owner of the subject property if other than the Permittee, have filed at the office of the Los Angeles County ("County") Department of Regional Planning (“LA County Planning”) their affidavit stating that they are aware of and agree to accept all of the conditions of this grant, and that the conditions of the grant have been recorded as required by Condition No. 7, and until all required monies have been paid pursuant to Condition No. 10 and 11, and 14. Notwithstanding the foregoing, Condition No. 2 and Condition Nos. 4, 5, 8, and 11 shall be effective immediately upon the date of decision of this grant by the County.

3. **Date of Final Approval**. Unless otherwise apparent from the context, the term “date of final approval” shall mean the date the County’s action becomes effective pursuant to County Code Section 22.222.230 (Effective Date of Decision and Appeals).

4. **Indemnification**. The Permittee shall defend, indemnify, and hold harmless the County, its agents, officers, and employees from any claim, action, or proceeding against the County or its agents, officers, or employees to attack, set aside, void, or annul this permit approval, which action is brought within the applicable time period of Government Code section 65009 or any other applicable limitations period. The County shall promptly notify the Permittee of any claim, action, or proceeding and the County shall reasonably cooperate in the defense. If the County fails to promptly notify the Permittee of any claim, action, or proceeding, or if the County fails to cooperate reasonably in the defense, the Permittee shall not thereafter be responsible to defend, indemnify, or hold harmless the County.

5. **Litigation Deposit**. In the event that any claim, action, or proceeding as described above is filed against the County, the Permittee shall within ten days of the filing make an initial deposit with LA County Planning in the amount of up to $5,000.00, from which actual costs and expenses shall be billed and deducted for the purpose of defraying the costs or expenses involved in LA County Planning's cooperation in the

defense, including but not limited to, depositions, testimony, and other assistance provided to Permittee or Permittee's counsel.

If during the litigation process, actual costs or expenses incurred reach 80 percent of the amount on deposit, the Permittee shall deposit additional funds sufficient to bring the balance up to the amount of $5,000.00. There is no limit to the number of supplemental deposits that may be required prior to completion of the litigation.

At the sole discretion of the Permittee, the amount of an initial or any supplemental deposit may exceed the minimum amounts defined herein. Additionally, the cost for collection and duplication of records and other related documents shall be paid by the Permittee according to County Code Section 2.170.010 (Fees for Providing County Records).

6. **Invalidation**. If any material provision of this grant is held or declared to be invalid by a court of competent jurisdiction, the permit shall be void and the privileges granted hereunder shall lapse.

7. **Recordation**. Prior to the use of this grant, the Permittee, or the owner of the subject property if other than the Permittee, shall **record the terms and conditions** of the grant in the office of the County Registrar-Recorder/County Clerk (i.e. Recorder's Office). In addition, upon any transfer or lease of the property during the term of this grant, the Permittee, or the owner of the subject property if other than the Permittee, shall promptly provide a copy of the grant and its conditions to the transferee or lessee of the subject property.

8. **Grant Term.** This grant shall expire if the Development Agreement is revoked due to non-compliance. Otherwise, the CUP shall remain in full force and effect until such time as the university ceases operation or the portion of the Project Site occupied by the expanded university uses is redeveloped.

9. **Expiration**. This grant shall expire unless used as defined in the associated Development Agreement.

10. **Inspections**. The subject property shall be maintained and operated in full compliance with the conditions of this grant and any law, statute, ordinance, or other regulation applicable to any development or activity on the subject property. Failure of the Permittee to cease any development or activity not in full compliance shall be a violation of these conditions. No provision of any easement of or any other encumbrance on the property shall exempt the Permittee and/or property owner from compliance with these conditions and applicable regulations. Inspections shall be made to ensure compliance with the conditions of this grant as well as to ensure that any development undertaken on the subject property is in accordance with the approved site plan on file. The Permittee shall deposit with the County the sum of **$4,700** which shall be placed in a performance fund and be used exclusively to reimburse LA County Planning for all expenses incurred while inspecting the premises to determine the Permittee's compliance with the conditions of this grant. The funds provide for **10** inspections.

Inspections may be unannounced. Inspections may be conducted utilizing any available technologies, including, but not limited to, unmanned aircraft systems (UAS). Use of a UAS requires the consent of the Permittee pursuant to LA County Planning's UAS policy, which may be updated from time to time, and which shall be provided to the Permittee upon request.

If additional inspections are required to ensure compliance with the conditions of this grant, or if any inspection discloses that the subject property is being used in violation of any one of the conditions of this grant, the Permittee shall be financially responsible and shall reimburse LA County Planning for all additional enforcement efforts necessary to bring the subject property into compliance. The amount charged for additional inspections shall be **$470.00** per inspection, or the current recovery cost established by LA County Planning at the time any additional inspections are required, whichever is greater.

11. **Environmental Document Filing Fees.** Within five (5) working days from the day after the appeal period ends, May 18, 2026**,** the Permittee shall remit processing fees at the County Registrar-Recorder/County Clerk Office (i.e. County Clerk Office), payable to the County of Los Angeles, in connection with the filing and posting of a Notice of Determination ("NOD") for this project and its entitlements in compliance with section 21152 of the Public Resources Code. Unless a Certificate of Exemption is issued by the California Department of Fish and Wildlife pursuant to section 711.4 of the California Fish and Game Code, the Permittee shall pay the fees in effect at the time of the filing of the NOD, as provided for in section 711.4 of the Fish and Game Code, currently **$3,043.75** ($2,968.75 for a Negative Declaration or Mitigated Negative Declaration plus $75.00 processing fee), or **$4,198.50** ($4,123.50 for an Environmental Impact Report plus $75.00 processing fee). No land use project subject to this requirement is final, vested or operative until the fee is paid.

12. **Mitigation Monitoring and Reporting Program**. The Permittee shall comply with all mitigation measures identified in the Mitigation Monitoring and Reporting Program ("MMRP"), which are incorporated by this reference as if set forth fully herein.

13. **Covenant and Agreement**. Within thirty (30) days of the date of final approval of the grant by the County, the Permittee shall record a covenant and agreement, which attaches the MMRP and agrees to comply with the mitigation measures imposed by the CEQA Addendum for this project, in the Recorder's Office. Prior to recordation of the covenant, the Permittee shall submit a draft copy of the covenant and agreement to LA County Planning for review and approval. As a means of ensuring the effectiveness of the mitigation measures, the Permittee shall submit annual mitigation monitoring reports to LA County Planning for approval or as required. The reports shall describe the status of the Permittee's compliance with the required mitigation measures.

14. **Mitigation Monitoring and Reporting Program Deposit**. The Permittee shall deposit an initial sum of **$6,000.00** with LA County Planning within thirty (30) days of the date of final approval of this grant in order to defray the cost of reviewing and

verifying the information contained in the reports required by the MMRP. The Permittee shall replenish the mitigation monitoring account if necessary until all mitigation measures have been implemented and completed.

15. **Revocation**. Notice is hereby given that any person violating a provision of this grant is guilty of a misdemeanor. Notice is further given that the Regional Planning Commission ("Commission") or a Hearing Officer may, after conducting a public hearing, revoke or modify this grant, if the Commission or Hearing Officer finds that these conditions have been violated or that this grant has been exercised so as to be detrimental to the public's health or safety or so as to be a nuisance, or as otherwise authorized pursuant to County Code Chapter 22.238 (Modifications and Revocations). Failure of the Permittee to cease any development or activity not in full compliance shall be a violation of these conditions and may result in revocation.

16. **County Fire Code.** All development pursuant to this grant shall comply with the requirements of Title 32 (Fire Code) of the County Code to the satisfaction of the County Fire Department.

17. **County Public Works Requirements**. All development pursuant to this grant shall comply with the requirements of the County Department of Public Works to the satisfaction of said department.

18. **Exhibit "A."** All development pursuant to this grant shall comply with the requirements of Title 22 (Planning and Zoning) of the County Code and of the specific zoning of the subject property, unless specifically modified by this grant, as set forth in these conditions, including the approved Exhibit "A," or a revised Exhibit "A" approved by the Director of LA County Planning ("Director").

19. **Maintenance.** The Permittee shall maintain the subject property in a neat and orderly fashion. The Permittee shall maintain free of litter all areas of the premises over which the Permittee has control.

20. **Graffiti.** All structures, walls and fences open to public view shall remain free of graffiti or other extraneous markings, drawings, or signage that was not approved by LA County Planning. These shall include any of the above that do not directly relate to the business being operated on the premises or that do not provide pertinent information about said premises. The only exceptions shall be seasonal decorations or signage provided under the auspices of a civic or non-profit organization.

    In the event of graffiti or other extraneous markings occurring, the Permittee shall remove or cover said markings, drawings, or signage within 48 hours, weather permitting. Paint utilized in covering such markings shall be of a color that matches, as closely as possible, the color of the adjacent surfaces.

21. **Revisions to the Exhibit "A."** The subject property shall be developed and maintained in substantial conformance with the plans marked Exhibit "A." If changes to any of the plans marked Exhibit "A" are required as a result of instruction given at

the public hearing, **an electronic copy of** a modified Exhibit "A" shall be submitted to LA County Planning by **June 28, 2026.**

22. **Subsequent Revisions to the Exhibit "A."** In the event that subsequent revisions to the approved Exhibit "A" are submitted, the Permittee shall submit **an electronic copy of** the proposed plans to the Director for review and approval. All revised plans must substantially conform to the originally approved Exhibit "A." All revised plans must be accompanied by the written authorization of the property owner(s) and applicable fee for such revision.

PERMIT-SPECIFIC CONDITIONS - CONDITIONAL USE PERMIT

23. **Building Review.** The Permittee shall submit an application to LA County Planning for the review and approval of plans for each building or component of the project reflecting the final architectural design.

24. **Construction Limits.** No more than two individual buildings can be under construction at any one time and the two individual buildings under construction cannot be adjacent to, or adjoining, the same existing offsite residential area.

25. **No-Cost Programming.** The Permittee shall offer no cost participation in the Saturday Science Academy program for students that reside within a quarter mile radius of the Wellness and Education Campus project, subject to prequalification criteria.

26. **Public Events.** A public event plan shall be developed, to the satisfaction of the Director, addressing items including, but not limited to, frequency of events, event hours, set up and breakdown of events, expected number of attendees, event parking, locations of temporary restroom facilities, amplified sound plans, and lighting plans.

27. **Public Access to Campus Open Space and Walking Paths.** The Permittee shall provide public access to the university's open space and walking paths; public access must be permitted during daylight hours.

28. **Public Access to Athletics Field and Facilities.** The Permittee shall develop a rental/reservation system, to the satisfaction of the Director, to allow public access to the athletic field and facilities, to be provided during the evening hours (6:00PM – 11:00PM) and on weekends, when not in use by the university.

29. **Public Access to Meeting Spaces.** The Permittee shall develop a rental/reservation system, to the satisfaction of the Director, to allow public access to the university meeting spaces, to be provided during normal business hours (6:00AM – 11:00PM) seven days a week, when not in use by the university.

30. **Public Art.** The Permittee shall install no less than two (2) physical art installations which must be maintained as publicly accessible during normal business hours

(6:00AM – 11:00PM) seven days a week. Said installations shall be installed within 20 years of the date of final approval.

31. **Traffic Safety Improvement.** No later than the issuance of a certificate of occupancy for the parking structure, the Permittee shall provide funding for a Rectangular Rapid Flashing Beacon to be installed by the County at the intersection of Compton Avenue and 117th Street.

32. **Local and Targeted Worker Hiring Program.** The Permittee shall be subject to the Los Angeles County Local Hire and Disadvantaged Workers program.

33. **Community Workforce Agreement.** The Permittee shall enter into a Community Workforce Agreement for the parking structure portion of the project, as defined by the County's Community Workforce Agreement Policy.

34. **Campus Enrollment Limits.** This grant does not authorize an increase in the existing enrollment limit.

35. **Construction Equipment.** During any construction, the Permittee shall ensure that the construction contractors use electric welders and construction equipment that have engines of 25 horsepower or greater and that comply with USEPA Tier 4 Final non-road engine standards.

36. **Exterior Lighting.** All campus lighting shall be shielded and oriented downward to prevent light trespass to adjacent, non-university parcels. Athletic field lighting must be movement activated and/or time-limited outside of daylight hours. Athletic field lighting shall be limited to a maximum height of 73 feet.

37. **Drought Tolerant Landscaping.** All landscaping, plants, and trees must be native, or non-invasive and drought tolerant, and must be appropriate within the natural Willowbrook habitat.

38. **Electric Vehicle Charging Spaces.** The Permittee shall provide electric vehicle chargers and parking spaces in compliance with all applicable regulations at the time of building permit issuance.

39. **On-Campus Housing.** The proposed on-campus housing facilities shall only be made available to university students, staff, and faculty.

40. **County Department of Public Works Conditions.** The Permittee shall comply with all conditions set forth in the attached County Public Works Department letter dated January 15, 2026.

41. **County Fire Department Conditions.** The Permittee shall comply with all conditions set forth in the attached County Fire Department letter dated December 17, 2025.

Attachments:

Exhibit D-1 Mitigation Monitoring Program (pages 5-1 to 5-5)
Exhibit D-2 Public Works Department Letter dated January 15, 2026.
Exhibit D-3 Fire Department Letter dated December 17, 2025.

Exhibit E

Statement of Findings:
Plan Amendment
(Los Angeles County Code (LACC) Section 22.180 ET. SEQ.)

Charles Drew University
Wellness & Education Campus

June 28, 2023

Pursuant to Los Angeles County Code (LACC) Section 22.180.040.B, the Applicant requests a Plan Amendment to modify the Willowbrook TOD Specific Plan ("Specific Plan") to permit the following updates to the Specific Plan:

- Clarify that Wireless Telecommunications Facilities will be permitted as specified in LACC Section 22.140.760.
- Revise permitted building heights in the MU-2 Zone from 50 feet to 70 feet and to allow parking structures to be 110 feet tall.
- Reduce the minimum floor area for residential units, as detailed in Attachment B.
- Add minimum floor area standards for student housing dwelling units.
- Clarify that parking for student housing does not have to be separate from commercial uses.
- Allow off-site parking for student housing projects.

The Specific Plan amendments are detailed in Attachment B.

The following findings are provided, as required by the County of Los Angeles General Plan Amendment Statement of Findings:

A. The proposed amendment supports the Guiding Principles of the General Plan:

1. The proposed amendment employs Smart Growth.

The proposed project is an urban infill redevelopment of an abandoned public elementary school site to expand a vital community-oriented University. Thus, the site will continue to be used for educational purposes that are highly needed in the area. The project is not located in a sensitive ecological area, forest, or on agricultural lands. The project development at this location supports the following General Plan policies:

- *Policy ED 4.4: Incentivize infill development in urban and suburban areas that revitalizes underutilized commercial and industrial areas.*

- *Policy ED 4.6: Retrofit and reuse vacant and underutilized industrial and commercial sites in urban and suburban areas for emerging and targeted industries.*

Housing

The Project will provide 254 units of much needed affordable housing without displacing any existing residential units or other commercial uses. Additional market rate units geared toward the faculty and staff of the University will also promote smart growth principles by placing residential uses in close proximity to the employment center (Charles Drew University and nearby Martin Luther King Medical Center).

Employment

The goal of the Project is to expand the mission of Charles R. Drew University to provide additional student services and housing in an effort to make the University a fully-featured residential campus and expand its mission to provide education and employment opportunities to the surrounding community and beyond. The expanded campus will provide jobs for office works, retail, food service, facilities management, and other positions. Approximately 150 fulltime equivalent jobs will be created by the proposed campus expansion project.

Pedestrian-Oriented Development

The proposed project is located directly across 118th Street from the Charles R. Drew University campus. Thus, the new student housing, athletic facilities, and other support services will be located adjacent to the existing university campus with direct pedestrian access and connectivity promoting a pedestrian-oriented campus that serves university students and staff, as well as the larger community by providing ground-floor commercial and retail uses integrated into the development. Additionally, under a separate but concurrent application, an approximately 800-foot portion of 118th Street, between Compton and Holmes Avenue, is proposed to be vacated and cars removed from the area between the existing campus and the proposed project. The vacated street will serve as a pedestrian promenade and provide a safety pedestrian experience between the existing campus and new development.

There will also be bean extensive network of landscaped pathways throughout the project site. Over 400 new trees will be planted on the project site to provide shaded canopies and reduce heat-island effects from the new impervious surfaces being introduced.

Residents, Senior, Students, and Employees

With its integrated network of open spaces and recreational facilities with programming and events available to the CDU university students, faculty and staff, residents, visiting schools, and the general public, the project provides a full spectrum of amenities to the

University and the surrounding community to transform it into a residential campus, thereby expending the higher education experience for the students without displacing access to other uses in the community.

Existing services and infrastructure

The site is serviced by multiple public transit services with LA Metro bus lines on Compton Avenue (Line 53 and 55) and Willowbrook Avenue (Line 202 and 205) and an LADOT Dash line on 120th Street. The Willowbrook A (Blue) Line Station is also located less than a half mile to the east from the project site providing linkage to the regional transportation network. The site is served by existing utilities and will not require upgrades to any services to provide utility service to the site.

The site is essentially flat so there will be minimal grading (111,000 cubic yards of export) needed to construct the facilities.

2. The proposed amendment ensures that community services and infrastructure are sufficient to accommodate growth.

Infrastructure

The project site is located in a built-out urban environment with existing utilities services already in place that served the vacant school buildings on the site. The new development will tie into existing utility infrastructure already in place in the surrounding street. The project will construct any new laterals or other infrastructure to tie into the existing sewers, storm drains, water lines, etc. It is not expected that project demands will exceed the capacity of any of the infrastructure to serve the project.

The project is in FEMA Floor Control Zone X, which means it is not prone to flooding and no flood control measures need to be constructed for the project.

Schools and Public Facilities

The project site is served by a variety of community services *and nearby facilities*. There are schools, parks, fire stations, libraries, police facilities, and a hospital all within a short distance to the project site. The property itself is partially-owned by the Compton Unified School District, which will serve as the primary school district for children and families who live on the site. Due to the nature of the project's residential components being larger for affordable income units, senior housing, and student housing, few of these would be expected to house significant number of school age children.

The site is also in close proximity to the Los Angeles County Public Library Willowbrook branch, located approximately 1,000 feet to the east of the site on Wilmington Avenue.

The new campus expansion will be located approximate 800 feet from Los Angeles County Fire Station No. 41, located on 120th street, just southeast of the site.

Public safety for the new campus expansion will be provided by CDU's Campus Safety and Security Department. The Department is fully staffed with security officers, who are armed and trained to respond to a wide variety of safety and health-related emergencies, and will maintain relationship with the Los Angeles County Sheriff's Department and other public safety agencies, as needed.

Traffic and Circulation

The existing roadway infrastructure is sufficient to accommodate the growth in population and employees associated with the project. The LA County Public Works Department has indicated that no street or sidewalk widening is required on any of the abutting streets. The impacts of traffic on the level of service of nearby intersections will be studies as part of the environmental review process, but there is not expected to be any significant impact in the Vehicle Miles Travelled (VMT) resulting from the project.

Parking

The Project site is located within 0.5-miles of the Willowbrook/Rosa Parks Metro Rail A Line station. Therefore, the Project is eligible for parking relief under Assembly Bill (AB) 2097, adopted in September 2022. Proposed future uses related to residential (including market-rate and affordable housing), office, and retail/commercial are exempt from the parking standards in LA County Code Section 22.112 and the Specific Plan. However, the project will provide Code-required parking for its facilities in a combination of underground parking and a new nine level, 637 space parking garage, ensuring that there will be no spillover of parking onto City streets in the surrounding neighborhood. The project will also provide code-required bicycle parking.

Community Access and Programming

Altogether the project will provide for additional activity throughout the day and night. The proposed athletic facilities will be made available to the community for public use to the extent possible. These facilities will serve the residents and students at the University and provide some additional recreational opportunities for the community at large.

In terms of public safety, the project is not expected to increase demands for local law enforcement. While no campus or neighborhood setting is immune from violence, CDU is considered a very safe environment for the community at large, and actively maintains and trains its faculty, staff, and students according to its Emergency Response Plan and policies. CDU provides a 24/7 Campus Safety and Security department, staff with full-time Campus Security Officers, who are armed and trained to respond to a wide variety of safety and health-related emergencies. Officers are certified in First Aid/CPR/AED response, trained in Active Shooter response, evacuation drills, special events and general crowd control. Further, the CDU campus maintains a number of public safety infrastructure and communication systems and operations that will be extended to the Wellness and Education Campus Expansion, including but not limited to:

- Emergency Evacuation and Wayfinding Routes marked;

- Emergency Call Boxes throughout the campus, classrooms and parking structures;
- Emergency Towers located throughout Campus;
- Emergency Public Address System;
- Everbridge Notification System (instant text message, email, telephone, cell phone alerts);
- Telephones in all offices and classrooms with speakers;
- Campus Safety Officer escorts, as needed;
- Security Cameras located throughout campus in selected locations;
- Night lighting with high intensity lights located throughout campus; and,
- Shuttle Service to the Metro Willowbrook Station.[1]

Altogether, the CDU Campus Safety and Security Department in collaboration with local safety, law enforcement, and public agencies will fulfill the County's General Plan policy S 7.3 to, "Coordinate with other County and public agencies, such as transportation agencies and health care providers, on emergency planning and response activities, and evacuation planning."

3. The proposed amendment provides the foundation for a strong and diverse economy.

The central mission of the Charles R. Drew University of Medicine and Science is to cultivate, "…diverse health professional leaders who are dedicated to social justice and health equity for underserved populations through outstanding education, research, clinical service, and community engagement." The proposed project furthers this mission by adding valuable student support facilities for the University. These include student housing, athletic facilities, additional office uses, retail, and food services. These will all help build the University into a stronger institution of higher education, which will provide more health care professionals to serve the local community and the region. The proposed amendments to the Willowbrook TOD Specific Plan are necessary to enable the facilities to be built to current industry standards for residential unit size, building heights and parking. Without the amendments for minimum unit size, less marketable and fewer dwelling units can be accommodated with the site.

The proposed project and requested Plan Amendments will support a number of General Plan policies, including:

- *Policy ED 1.1: Encourage a diverse mix of industries and services in each Planning Area.*

[1] Charles R. Drew University of Medicine and Science, Campus Safety and Security. https://www.cdrewu.edu/academics/facultystaff/Offices/CampusSafety. Accessed June 12, 2023.

- *Policy ED 1.4: Encourage the expansion and retention of targeted industries and other growth economic sectors, such as the entertainment industry, aerospace industry, agriculture, transportation/logistics, healthcare, biomed/biotech, hospitality and tourism.*

- *Policy ED 1.6: Develop, advance, and promote competitive advantages for economic development and growth.*

- *Policy ED 2.3: Ensure environmental justice in economic development activities.*

- *Policy ED 4.5: Direct resources to economically distressed areas to spur revitalization activities.*

- *Policy ED 5.1: Attract and retain highly skilled graduates, in particular, graduates of science and engineering programs.*

4. **The proposed amendment promotes excellence in environmental resource management.**

   The site will be integrated with an open space network, including the provision of a plaza, athletic fields that are open and accessible to the public. The project will provide an expanded walkable campus, with on-site residential, transform the University from historically a commuter-only university to a residential university. The project will prioritize pedestrian-oriented development, access to active transportation and public transit resources, thereby reducing VMT, greenhouse gas emissions, noise, and potential traffic incidents from fewer commuters for the school's student population, as well as residents, seniors. The project will also integrate high-quality architecture and materials throughout the development resulting in the provision of a well-connected mixed-use center providing ground-floor commercial uses, recreational amenities, open space, and housing that includes 250 student housing units, 200 affordable units, 54 affordable senior units, and 55 market-rate units, for a total of 559 units.

5. **The proposed amendment provides healthy, livable and equitable communities.**

   The project will provide 559 brand new dwelling units that will comply with all environmental regulations to provide a healthy living environment. There will be outdoor spaces for recreation, parking, and other amenities expected in today's market. Two hundred of the units will be set aside for affordable housing for moderate income residents providing much need affordable housing to the region and the community. The project also includes 54 much needed senior housing units that will serve another segment of the community that is need of affordable housing options.

The proposed Specific Plan amendment makes it possible to develop the project with these qualities. The proposed reduction in minimum unit sizes, makes it more affordable to construct the project, given the high cost of construction and operation of affordable housing development. The other amendments will also allow the project to be developed within a reasonable envelope that will not adversity impact adjacent property owners. The proposed parking structure abuts a freeway on two sides so the height will not impact residents. The parking structure will also prove a noise barrier for the I-105 Freeway to the north of the project site.

B. The proposed amendment is consistent with the goals and policies of the General Plan.

As described above, the proposed project is consistent with the goals and policies of the General Plan. The project is a permitted us in the MU-2 zone in the Willowbrook TOD Specific Plan and is consistent with the following specific plan goals and policies:

- *Policy 1.5: Facilitate the expansion of the MLK Medical Center and CDU campus that is compatible and sensitive to the surrounding neighborhoods.*
- *Goal 1: Preserve and enhance the character of the Willowbrook community.*
- *Policy 1.1: Where appropriate, preserve the character of the residential neighborhoods.*
- *Policy 1.2: Provide a mix of land uses in the Mixed Use Zones to accommodate employment, retail, and residential uses, as well as local-serving amenities.*
- *Policy 1.3: Preserve existing neighborhood-serving retail at Kenneth Hahn Plaza.*
- *Policy 3.2: Implement mixed use zoning in targeted areas to promote employment-generating uses. Proximate to housing and the Willowbrook/Rosa Parks Station.*
- *Policy 3.3 Incentivize lot consolidation where appropriate to facilitate the development of cohesive projects in Mixed Use Zones.*

The amendment is consistent with the principles of the General Plan's Economic Development Element.

- Policy *ED 2.9: Streamline the permit review process and other entitlement processes for businesses and industries.*
- *Policy ED 4.4: Incentivize infill development in urban and suburban areas that revitalizes underutilized commercial and industrial areas.*

Exhibit E

C. The proposed amendment will benefit the public interest and is necessary to realize an unmet local or regional need.

In conformance with the goals and policies in the General Plan and the Willowbrook TOD Specific Plan, the CDU Wellness and Education Campus will benefit the public interest and is necessary to realize an unmet local or regional need because the project will provide 200 units of critically needed affordable housing, 54 senior housing units, and 254 units of student housing for Charles R. Drew University. The project will also provide much needed recreational facilities for the university to transform the university into a more traditional residential campus from the current commuter campus. This will also enable the University to expend its mission to train health care professionals in a disadvantaged community to serve such communities.

The California Wellness Foundation has estimated that as much as one-third of all minority physicians practicing in Los Angeles County are graduates of Charles R. Drew University or come from its residency training programs. The Specific Plan amendments will allow the project to achieve these goals through the modification of several development standards to fit the design of the project.

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Development Agreement Findings

Per Sec. 22.162.040.A.2, the Regional Planning Commission shall recommend approval of an application to the Board if the following findings are made:

a. The proposed Development Agreement is consistent with the General Plan and any applicable Community, Area, or Specific Plan.

General Plan

The proposed Development Agreement allows for the urban infill redevelopment of an abandoned public elementary school site and vacant County parcel to expand a vital community-oriented University. Thus, the site will continue to be used for educational purposes that are highly needed in the area. The project is not located in a sensitive ecological area, forest, or on agricultural lands.

The project development at this location supports the following General Plan policies:

Policy ED 4.4: Incentivize infill development in urban and suburban areas that revitalizes underutilized commercial and industrial areas.

Policy ED 4.6: Retrofit and reuse vacant and underutilized industrial and commercial sites in urban and suburban areas for emerging and targeted industries.

Housing

The Project will provide 249 units of much needed affordable housing without displacing any existing residential units or other commercial uses. Additional 305 market rate units for students, faculty, and staff of the University will also promote smart growth principles by placing residential uses in close proximity to the employment center (Charles Drew University and nearby Martin Luther King Jr. Medical Center) and Charles R. Drew University.

Employment

The goal of the Project is to expand the mission of Charles R. Drew University to provide additional student services and housing in an effort to make the University a fully-featured residential campus and expand its mission to provide education and employment opportunities to the surrounding community and beyond. The expanded campus will provide jobs for office works, retail, food service, facilities management, and other positions. Approximately 150 fulltime equivalent jobs will be created by the proposed campus expansion project.

Pedestrian-oriented development

The proposed project is located directly across 118th Street from the Charles R. Drew University campus. Thus, the new student housing, athletic facilities, and other support services will be located adjacent to the existing university campus

Exhibit E

with direct pedestrian access and connectivity promoting a pedestrian-oriented campus that serves university students and staff, as well as the larger community by providing ground-floor commercial and retail uses integrated into the development. Additionally, under a separate but concurrent application, an approximately 700-foot portion of 118th Street, between Compton Avenue and Holmes Avenue, is proposed to be vacated and cars removed from the area between the existing campus and the proposed project. The vacated street will serve as a pedestrian promenade and provide a safety pedestrian experience between the existing campus and new development.

There will also be an extensive network of landscaped pathways throughout the project site. Although only 168 are required, 277new trees will be planted on the project site to provide shaded canopies and reduce heat-island effects from the new impervious surfaces being introduced.

Residents, Senior, Students, and Employees

With its integrated network of open spaces and recreational facilities with programming and events available to the CDU university students, faculty and staff, residents, visiting schools, and the general public, the project provides a full spectrum of amenities to the University and the surrounding community to transform it into a residential campus, thereby expending the higher education experience for the students without displacing access to other uses in the community.

Existing services and infrastructure

The site is serviced by multiple public transit services with LA Metro bus lines on Compton Avenue (Line 53 and 55) and Willowbrook Avenue (Line 202 and 205) and an LADOT Dash line on 120th Street. The Willowbrook A (Blue) Line Station is also located less than a half mile to the east from the project site providing linkage to the regional transportation network. The site is served by existing utilities and will not require upgrades to any services to provide utility service to the site.

The site Is essentially flat so there will be minimal grading 71,000 cubic yards of export) needed to construct the facilities.

Area Plan

The proposed Development Agreement is located within the Metro Area Plan (MAP), specifically the Willowbrook community. As noted in the MAP, the Willowbrook community “is home to significant regional assets, including the Martin Luther King, Jr. Hospital and the Willowbrook/Rosa Parks Metro station, a major transit hub at the junction of the A and C lines.” The plan goes on to note that “the Watts Uprising was a catalyst for government intervention and community organization that shaped the community… Administrative institutions stimulated employment, increased access to education and healthcare, and attempted to shape the community’s behavior through

Exhibit E

urban design." The proposed expansion of Charles R. Drew University, itself a significant regional asset whose campus is located directly across 120th St. from Martin Luther King Jr. Hospital, continues this historic trend seeking to enhance access to healthcare and education within the Willowbrook community.

The Development Agreement aligns with the applicable goals, intents, and policies of the MAP as outlined below:

Areawide Goals and Policies
3.1.1 / Land Use Vision – Build upon the cultural identity, patterns and assets within Area Plan communities to ensure a balanced mix of land uses.

The Development Agreement facilitates the expansion of the existing Charles R. Drew University, a federally designated Historically Black Graduate Institution, one of only four historically Black medical colleges in the United States and the only such institution west of the Mississippi River. This community asset has a proven track record within the Willowbrook community, and the expansion will provide for much needed new housing units and other facilities during the state and regional ongoing housing crisis.

3.1.1 / Clean Industrial, Small Manufacturing, and Life Science Facilities

The MAP states, "The evolution of the industrial sector presents the potential to attract and facilitate the development of lesser and non-polluting science- and technology-driven. Some examples include life science facilities… whose operations would be more sensitive to residential neighbors than existing heavy industrial uses. Successful life science and biotech clusters tend to be strategically placed in proximity to renowned research and education institutions. Within the metro area are several such well-known institutions including California State University – Los Angeles, Charles R. Drew University of Medicine and Science, Los Angeles Southwest College, and the University of Southern California."

Approval of the requested Development Agreement further reinforces this goal. The project creates student housing, new educational facilities, and affordable housing within the community. A more robust Charles R. Drew University will be more attractive to the kinds of secondary uses outlined above.

The following is a list of specific areawide goals and policies the project aligns with:

Goal LU 6–- Industrial uses transition to technologies, industries, and operations that have minimal impact on sensitive uses and the natural environment.

> *Policy LU 6.1: Orderly Transition to Cleaner Industries. Encourage transitioning of industrial uses to cleaner industries, including but not*

Exhibit E

limited to science- and technology-driven research and development uses, cleantech and life science facilities, small-scale and artisan manufacturing, and experiential retail in industrially zoned areas. Implement updates to nonconforming provisions of the Zoning Code to provide for the orderly and timely transition of non-conforming industrial uses per the Green Zones program, particularly when the industrial use is within 500 feet of sensitive uses such as residential uses, schools, and parks.

Goal LU 8 – Industrial areas are clean, safe, and aesthetically pleasing.

Goal TOD 1 – Residents can live, work, learn, and recreate in a transit-oriented community.

Policy TOD 1.1: Housing and Mixed-Use Development. Provide mixed-use, medium- to high-density mixed-income residential development and/or affordable housing in Transit Oriented Districts. (Refer to Infill Development policies in the Land Use Element and Housing Availability policies in the Housing Element of the General Plan for more information.)

Policy TOD 1.4: Incentivize Specific Uses. Incentivize development that incorporates desired uses, such as affordable housing, job-generating uses, community-serving retail and services, entertainment venues, or other uses that meet the public's daily needs. Incentives can include reduced parking requirements, increased floor area ratio, increased height allowance, or other methods.

Goal ED 2 – Diverse industries that provide quality work for the local community.

Policy ED 2.1: Support the transition of aged industrial spaces to revitalized job-generating uses that are compatible with their immediate environment.

Policy ED 2.3: Preserve and increase job opportunities in industrial and commercial areas that match residents' skill levels.

Policy ED 2.4: Encourage local hiring and targeted hiring of workers from the community through the use of development agreements or community benefit agreements in discretionary projects.

Willowbrook Community-Specific Goals and Policies of the MAP

Goal 34–- Development in Transit Oriented Districts supports transit use, encourages active transportation connectivity, and revitalizes station areas.

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Policy 34.1: Willowbrook TOD Specific Plan. Support recommendations to facilitate mixed use development and increase housing opportunities and neighborhood-serving retail uses, all while improving pedestrian linkages to major community assets like the Kenneth Hahn Plaza, MLK Medical Center, and the Charles R. Drew University of Medicine and Science.

Goal 35 – A variety of retail types meeting local needs and offering a mix of products and services.

Policy 35.2: Healthcare Services and Office Uses. Encourage neighborhood amenities that support healthcare services and office uses, as well as connectivity with the nearby Willowbrook/Rosa Parks Metro A/C Line Station and Opportunity Areas identified as Transit Center, Corridor and Neighborhood Center Opportunities.

Goal 36 – Diverse industries that provide quality work for the local community.

The Project helps to achieve all these stated goals and policies. The expansion of Charles R. Drew University facilitates the broader goal to transition towards more environmentally friendly industries, like life-sciences. The Project also improves the quality of the built environment by replacing vacant and/or vandalized property with new, high-quality, pedestrian- and transit-oriented design which includes amenities like walking paths, exercise facilities, and educational opportunities for the broader community, not just the University's students. The Project will also result in both short-term jobs, such as construction work, as well as long-term job opportunities following construction, for quality work within the community.

Specific Plan

The proposed Development Agreement is located within the Willowbrook Transit Oriented District (TOD) Specific Plan. The Specific Plan is part of the implementation program for the MAP outlined above. Per the Specific Plan, "the purpose of the Willowbrook TOD Specific Plan is to revitalize the community within the project area and to improve access to all modes of transportation including transit, walking, and bicycling… In addition, the Specific Plan is intended to foster a healthy community by improving pedestrian linkages between the Willowbrook/Rosa Parks Station, Kenneth Hahn Plaza, MLK Medical Center, CDU, future mixed-use areas, and existing residential neighborhoods." ("CDU" refers to Charles R. Drew University.)

The proposed Development Agreement facilities the goals and policies of the plan, including the following:

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

Exhibit E

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

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

Goal 3: Encourage transit-oriented development.

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

Goal 4: Provide affordable housing opportunities.

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

Goal 7: Improve economic vitality and employment opportunities.

Policy7.1: Create economic opportunities for the Willowbrook community by fostering a complementary variety of employment, retail, residential, and institutional uses.

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

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

The Specific Plan identifies the Project Site as within the "Northwest Subarea" that may provide a variety of housing options for current and future workers, residents in the area and university/student housing. The Specific Plan also encourages employment generating uses within this subarea, "such as medical back office, laboratory facilities, hospital equipment facility, medical or university support businesses, etc. that provide job opportunities for both local residents and others." The current zoning within the Specific Plan for the entire Project site is Mixed Use 2 (MU-2) land use designation. Consistent with the general vision for the Northwest Subarea, the MU-2 zone is generally intended to provide commercial and residential development, with an emphasis on employment generating uses and residential infill development, such as an office or business park and residential mixed-use developments, with open space components and pedestrian connection to the Willowbrook/Rosa Parks Station, Charles R. Drew University and the

Exhibit E

MLK Medical Campus. Schools, including accessory facilities, associated with a college or university (i.e., CDU) are uses that are conditionally permitted within the MU-2 land use designation.

Approval of the Development Agreement allows the Project to be developed in phases, which is necessary for the practical feasibility of the Project. As noted in the proposed DA, "the Parties acknowledge that Collaborative and its Members cannot at this time fully predict when or at what rate the Project Site will be developed. Such decisions depend upon numerous factors that are not within the control of the Collaborative and its Members, such as market orientation and demand, availability of financing, interest rates, absorption, competition and similar factors." Nonetheless, the phasing of the Project has been structured so as to prioritize community benefits, such as new affordable housing.

Section 2.7.2.2. of the proposed Development Agreement outlines many of the public benefits to be received as a result of development of the Project. It notes:

a. According to the RSG study dated February 23, 2023, development of the Wellness and Education Campus, a vital community asset within the County, is anticipated to provide approximately $295 million worth of benefits to the Willowbrook community, including the creation of approximately 5,500 construction and 750 permanent jobs ;
b. Implementation of a well-planned job training and local hiring program to meet the community's goal of employing local and Los Angeles County residents in the construction of the Project, and for permanent jobs at the Wellness and Education Campus with participation from diverse minority, women, and veteran-owned business enterprises, and small businesses;
c. Implementation of a Community Workforce Agreement at the Parking Structure as defined by the County's Community Workforce Agreement Policy as of the date of this agreement;
d. Construction of no less than 220 and up to 254 deed-restricted Affordable Housing units set aside for 99-years and restricted to qualified residents whose incomes do not exceed 80 percent of the AMI to assist in meeting the affordable housing needs of the County as further described in Exhibit A;
e. Development on an art program to provide Public Art as that term is defined in the County's Public Art in Private Development Requirement to satisfy the County's Public Art Requirement;
f. Assurance that development of the Project will proceed in accordance with a coordinated master plan which was the result of a comprehensive and coordinated planning process by and among the Parties and the community in which private and public goals, objectives and interests were thoughtfully integrated and resolved in an optimal fashion.

Exhibit E

Overall, the proposed Development Agreement allows for a more flexible development schedule, increasing ability of the applicant to fully realize the Project over time. A multi-phase project that depends on many different funding sources requires many years to build out. The Development Agreements allows the necessary time for fundraising, programming, design, and construction to be completed. Without the Development Agreement, it would not be feasible to complete the project within the lifetime of the entitlements. Thus, without the Development Agreement it is not feasible to achieve the goals and policies of all applicable plans discussed above.

b. The proposed Development Agreement complies with zoning, subdivision, and other applicable ordinances and regulations.

The Charles R. Drew University expansion project has already been considered as part of the County's long-term planning, as demonstrated above within the Goals and Policies of the Willowbrook TOD Specific Plan. The proposed Development Agreement project does not involve any subdivision component. As such, Title 21 of the LA County Code is not applicable in this case. Regarding zoning compliance, the Project fully complies with the residential density provisions of the Specific Plan. The subject application also involves a number of other discretionary entitlements, outlined below:

1. **Per LA County Code Sections 22.180 and 22.232, a Plan Amendment to the Willowbrook TOD Specific Plan and a Zone Text Amendment to the County Code** to amend TABLE 22.412.040-B, TABLE 22.412.040-F and other sections Within Chapter 22.412 .to allow up 70 feet for the proposed market-rate Faculty/Staff housing building with no story limitation, three market-rate student housing buildings, and the office building on the Project site. The height limit within the current Specific Plan is four stories and 50 feet. In addition, the County Code would authorize the proposed 110-foot tall parking structure with no story limitation, excluding any rooftop mechanical equipment. The Specific Plan/County Code would also be amended to allow university housing to provide additional common open space in lieu of private open space. The County Code would also eliminate the minimum residential unit sizes in the MU-2 zone in the Willowbrook TOD Specific Plan consistent with the Project.

2. **Per LA County Code Section 22.186, 22.140.222, and Chapter 3.1.A of the Willowbrook TOD Specific Plan, a Ministerial Site Plan Review (SPR)** to permit the construction of five affordable/senior multifamily housing buildings.

3. **Per LA County Code Section 22.166.050, an Administrative Housing Permit,** to permit Establish and monitor up to 254 units as affordable for low-income households. The Administrative Housing Permit also requests a housing Incentive to provide a zero-foot step-back on a 4-story building (Bldg. A5) with frontage on Compton Avenue in lieu of a 10-foot step-back on the 4th floor along with a request for a 9-foot setback on Compton Avenue in lieu of a 15-foot ground level setback.

Exhibit E

4. **Per LA County Code Section 22.158 and Section 22.412.040 B.2 , a Conditional Use Permit (CUP)** to allow the proposed University facilities and related one faculty/staff housing building, three market rate student housing buildings with ground floor retail, one 116,000 sf office building, one athletic facilities building, one athletic field, one, eight-story parking structure and uses that include storage, and accessory facilities within the MU-2 zone of the Willowbrook TOD Specific Plan.

5. **Per LA County Code, a Conditional Use Permit (CUP for grading in excess of 100,000 cubic yards. The project proposes a total earthwork volume of 151,000 cubic yards.**

Each of these reviews involve thorough vetting of the project for compliance with applicable zoning code regulations, as well as other applicable ordinances and regulations. Furthermore, the Project will be required to complete plan check with Building and Safety prior to the issuance of any building permits for construction. As such, any potential zoning inconsistencies heretofore unidentified will be addressed as part of the plan check permitting process.

With approval of the requested Specific Plan Amendment, Zoning Text Amendment, and Conditional Use Permit, the project will comply with all applicable regulations.

c. The proposed Development Agreement is consistent with the public safety, welfare, and convenience, making it in the public interest to enter into the Development Agreement with the applicant.

The proposed Development Agreement is consistent with the public safety, welfare, and convenience, making it in the public interest to enter into the Development Agreement with the applicant. As outlined within the Development Agreement, the CDU Project will incorporate project design features, including (but not limited to):

Construction Equipment: As a best management practice and sustainable feature of the Proposed Project, the construction contractors for each individual development area will use construction equipment that have engines of 25 horsepower (hp) or greater that complies with USEPA Tier 4 Final non-road engine standards and use electric welders during building construction.

CALGreen Building Code & Title 24 Energy Code Compliance (2022 or current version at time of building permit issuance): As such, compliance with the 2022 or current version of CALGreen and 2022 or current version of Title 24 energy efficiency standards will be required. The CALGreen code sets the minimum green building code requirements for planning, energy efficiency, water efficiency, materials & resource efficiency, and environmental quality. The Title 24 Energy code sets the minimum efficiency standards for building envelope, glazing, roofing, HVAC, lighting, water heating, renewable energy, and battery storage.

Exhibit E

Electric Vehicle (EV) Charging: The Project will provide EV installed and capable parking spaces (conduit installed) for both residential and non-residential spaces in accordance with the current versions of the CALGreen code and the Los Angeles County Code at the time of building permit issuance.

Solar Photovoltaics & Battery Storage: The Project will include solar photovoltaic (PV) as required by the Title 24 Energy Code, for all new residential buildings. The code minimum required PV system equates to an estimate of a 70% electricity offset for residential projects. Infrastructure for PV would be provided for all remaining buildings within the site. The Project will also include on-site battery storage, as required per Title 24 Code at the time of building permit issuance, to provide capabilities for peak-load demand management and resiliency for emergency use purposes.

Air Filtration & Monitoring: The Project design will include HVAC systems that are equipped with Minimum Energy Report Value (MERV) filters to reduce the particulate matter that can enter the buildings. The ratings of the MERV filters will be in compliance with the current version of Title 24 and the Los Angeles County Code at the time of building permit issuance.

A full list of sustainability features is included as Exhibit E within the Development Agreement.

In addition, the Department of Public Works, Building and Safety, inspectors, and the Project's architect and engineers will ensure all work is completed in accordance with applicable County standards and conditions of approval, which will further protect against the Project causing any serious public health problems for persons residing or working in the Willowbrook community.

Lastly, the Project involves several community benefits which enhance public safety, welfare and convenience. These include:

1. **Expansion of Science Academy Pipeline Programs and Learning Opportunities**

2. **No-Cost Programming and Events**
    a. *Saturday Science Academy:* The university will offer no cost participation in the Saturday Science Academy II program for students that reside within ¼ mile of the Project.
    b. *Events:* The university will facilitate events of public and community benefit as outlined in the Development Agreement. These events will take place between 8AM – 10PM and will obtain all required permits, such as a Special Events Permit, if planned to accommodate in excess of 750 people.

Exhibit E

3. **Increasing the Supply of Housing for Low-Income Households, Student, Faculty, and Workforce**
    a. *General Affordable Housing:* The Project will deliver no less than 220 affordable housing units ranging from 1-bedroom to 3-bedroom units.
    b. *Creation of Housing for Students, Workforce, and Faculty:* The development of up to four student housing buildings will provide up to 305 units of housing offered to students, faculty and workforce on the CDU campus.

4. **Privately Maintained Publicly Available Campus Facilities**
    a. *Open Space and Walking Path:* The Project will develop approximately 221,548 sq. ft. of on-site open space composed of open space and walking paths, creating a serene walking space that provides for calmness and peace which ultimately impact the mental and physical wellbeing of students and the community.
    b. *Public Access to Athletics Field and Facilities:* The proposed Athletic Facilities are anticipated to include a basketball court, swimming pool, indoor track, and exercise room. The proposed Athletics Field would be used primarily for soccer, but also serves as a multi-purpose outdoor recreational space.
    c. *State of the Art Educational Space:* The University will retain five thousand square feet within the office building to house the University's Pipeline Programs Lab Space, which will be equipped for educational programming focused on math, science, medicine, research, and experiential and machine learning. The University's educational Pipeline Programs will operate in the space during weekdays and weekends, focused on engaging K-12 students from various partnering high schools, and other youth-oriented organizations.
    d. *Access to Meeting Space for Local Community Organizations and Stakeholders:* The Campus will include facilities that are available to the community in several buildings. The University will allow community groups to use the spaces for gatherings, meetings, classes, and other activities through a reservation system when the spaces are not in use by the University. Use by outside organizations may also take place during the normal business hours of the university (6:00 am-11:00 pm, seven days a week).
    e. *Pedestrian Promenade:* Within seven (7) years from the effective date of the Agreement, the University shall submit a street vacation application for approximately 700 linear feet of East 118th street to be vacated and constructed into a privately-owned (maintained by the Collaborative), publicly accessible Pedestrian Promenade to serve as outdoor open space. The University will work with the County to expedite the approval of the street vacation and the clearance of

Exhibit E

conditions within nine (9) years of the effective date of the Agreement. Uses of the Pedestrian Promenade include pedestrian and bicycle travel and vehicular drop-off/turnarounds accessible from Compton Avenue along the western end of East 118th Street and adjacent to the existing Charles R. Drew University surface parking lot on the north and south sides of East 118th Street.

5. **Traffic Safety Improvement:** No later than the issuance of a certificate of occupancy for the parking structure, the Project will provide funding for a Rectangular Rapid Flashing Beacon (RRFB) to be installed by the County at the intersection of Compton Avenue and 117th Street. An RRFB generally consists of two rectangular- shaped yellow indications, each with a light-emitting diode (LED)-array-based light source. RRFBs flash with an alternating high frequency when activated by pedestrians to enhance visibility of pedestrians crossing the street at that location.

d. The proposed Development Agreement will not:

i. Adversely affect the health, peace, comfort, or welfare of persons residing or working in the surrounding area;

The project consists of residential, office, educational, and athletic facilities similar to other such uses in the surrounding area. With the exception of the proposed athletic fields, all of the uses will be within enclosed buildings, which will ensure that there are no noise, odors, or other impacts from the residents and occupants of the project on the peace, comfort or welfare of persons residing or working in the area. The project will add amenities, some of which will be available to use by the community, which will add to the healthy wellbeing of the community. The project will activate and redevelop a vacant school property, eliminating an eye sore and safety risk in the community by providing a pedestrian-oriented, mixed-use campus with high-quality architecture within a half-mile of the Willowbrook – Rosa Parks Metro light rail station. The campus expansion project will integrate attractively landscaped and open spaces, plazas, and pathways throughout the campus that are well-shaded and provide pedestrian connections and ground-floor uses to campus users and the surrounding community.

The project will enhance the welfare of the Charles Drew University and the surrounding neighborhood by providing approximately 250 market-rate apartment units for students, 196 units of affordable housing, 53 units of senior affordable housing, 5 manager's units, and 55 market-rate faculty/staff housing units. These housing units will help transform CDU from a commuter-only medical school into a residential university with additional, much-needed housing for the larger community. By integrating the proposed campus expansion with ground-floor retail, dining, open space and recreational facilities, the project will become a mixed-used residential and employment center that promotes walkability,

Exhibit E

reduced VMT and greenhouse gas emissions, and supports greater community safety and activity throughout the day and night.

ii. Be materially detrimental to the use, enjoyment, or valuation of property of other persons located in the vicinity of the site; or

For the reasons listed above, the Development Agreement will also not be detrimental to the use enjoyment or property values of other persons located in the vicinity of the project. Indeed, the Development Agreement is the mechanism by which the goals and policies of the various regulatory plans applicable to the Project Site are implemented through the Project. It includes enforcement provisions, such as Annual Review, to ensure compliance with the terms of the Development Agreement. It also allows for a more thoughtful timing of development otherwise not permitted for most discretionary projects, as the Applicant cannot fully predict when or at what rate the development will such place. As noted in the Development Agreement itself, "Such decisions depend upon numerous factors that are not within the control of [the Applicant], such as market orientation and demand, availability of financing, interest rates, absorption, competition and similar factors."

The Project results in many benefits that would otherwise not be possible without the Development Agreement. The Project will provide approximately 150 full times jobs, once completed, provide additional employment opportunities in the community. The project will also train healthcare professionals for the benefit of the Willowbrook area and the entire region. By providing housing for university students, faculty, and staff, the project will also tend to reduce traffic by allowing students and employees of the university to live on-campus, thereby eliminating commuting and traffic from over a 1,000 people at full build-out of the university housing.

The project will introduce new residents to the community who will shop at local establishments, thereby increasing economic vitality of the Willowbrook community. This in turn, will serve to enhance property value I the area as the customer base increases.

The proposed project will enhance the larger community by providing housing and a mixed-use center within walking distance of the Willowbrook – Rosa Parks Metro station. In the end, the project will transform nearly 13 acres from an inaccessible school campus and now vacant property, which had to be circumnavigated by pedestrians in all former cases, to a campus that reconnects the Northwest Subarea of the Specific Plan and allows pedestrian connectivity around and through the site. This link to the community will provide increased access to housing resources, employment opportunities, education, and recreational uses, thereby activating the site at all times of day and increasing "eyes on the street"

Exhibit E

and enhanced safety to the community. All of these factors are anticipated to bring additional value to the surrounding residential and commercial uses as the CDU Wellness and Education Campus become a thriving center and economic driver in the community.

iii. Jeopardize, endanger, or otherwise constitute a menace to the public health, safety, or general welfare.

Approval of the requested Development Agreement will neither jeopardize, endanger, nor otherwise constitute a menace to public health, safety, or general welfare. Indeed, the Project greatly enhances public health, safety, and general welfare. The Project's potential impacts were analyzed as part of the Willowbrook Transit Oriented District Specific Plan Final Program Environmental Impact Report Addendum ("EIR Addendum") prepared for the Project, which found that no new significant impacts would result from the proposed Project. Indeed, the Development Agreement is the strongest enforcement mechanism by which the County can ensure the Project incorporates all proposed Sustainability Features (Exhibit E) and other project components that ensure no negative public health, safety, or general welfare impacts result.

The general welfare is served by the redevelopment of the vacant and school site as an affordable housing for the community and to provision of student housing and support facilities for Charles R. Drew University. The proposed land uses for housing and a university will promote the general welfare through job creation, a range of employee levels and high wage positions, increased property values, increased tax base, and increased sales tax revenue at surrounding commercial businesses, and increased economic development opportunities for the Willowbrook community. Redevelopment of a vacant property enhances public health and safety as vacant parcels do not generate jobs or opportunity and are often sites of illegal dumping and other unsafe conditions.

This is particularly important for the now vacant, former Lincoln Elementary School site. As noted previously, the site has been subject to vandalism, stripping of building components, and used as homeless encampments. Due to vandalism and security issues with the abandoned school buildings, Compton Unified School District demolished the Lincoln Elementary School buildings in the fall of 2023. They removed the above ground structures and left the foundations and paved surface areas in place.

Furthermore, because there are a minimal number of residential uses in the immediate project area, the Project will create a comfortable transition with neighboring residences through the construction of mid-rise housing and university support facilities. Please note that the EIR Addendum found that there would be no noise, air quality or health risks associated with the proposed

Exhibit E

development. Indeed, regarding noise, the EIR Addendum states, “Unlike the Specific Plan Program’s potential significant noise impacts, the Proposed Project would result in less than significant construction and operational noise impacts.”

The Project complies with SB 375, AB 32 and SB 32 by contributing to reduced greenhouse gas emissions through integrated land use and transportation planning. One of the key components of the State’s mandate to reduce greenhouse gas emissions is the lessening of emissions from passenger vehicles, which represents about one-third of overall greenhouse gas emissions in the United States. Promoting infill opportunities is among the top strategies to reduce such emissions. The Project’s location, serviced by multiple bus lines and within 0.5 miles of the Metro A Line Willowbrook Station, will discourage Project employees and visitors from driving to or from the Project Site. This is especially important in areas that have traditionally been overdeveloped with heavy industrial uses resulting in an inequitable distribution of negative environmental impacts compared to other communities.

Exhibit E

Statement of Findings:
Conditional Use Permit (CUP)
(Los Angeles County Code Section 22.158)

Charles Drew University
Wellness & Education Campus

June 28, 2023

Pursuant to Los Angeles County Code (LACC) Section 22.158 and Chapter 3.5 of the Willowbrook TOD Specific Plan, a Conditional Use Permit (CUP) to allow University Facilities uses that include: university offices, athletic buildings, athletic fields (including special events), parking structure, storage, and accessory facilities within the MU-2 zone of the Willowbrook TOD Specific Plan.

The following findings are provided, as required by LACC Section 22.158.050.B:

B.1 The proposed use will be consistent with the adopted General Plan for the area.

The proposed project is an urban infill redevelopment of an abandoned public elementary school site to expand a vital community-oriented University. Thus, the site will continue to be used for educational purposes that are highly needed in the area. The project is not located in a sensitive ecological area, forest, or on agricultural lands. The project development at this location supports the following General Plan policies:

- *Policy ED 4.4: Incentivize infill development in urban and suburban areas that revitalizes underutilized commercial and industrial areas.*

- *Policy ED 4.6: Retrofit and reuse vacant and underutilized industrial and commercial sites in urban and suburban areas for emerging and targeted industries.*

Housing

The Project will provide 254 units of much needed affordable housing without displacing any existing residential units or other commercial uses. Additional market rate units geared toward the faculty and staff of the University will also promote smart growth principles by placing residential uses in close proximity to the employment center (Charles Drew University and nearby Martin Luther King Medical Center).

Exhibit E

Employment

The goal of the Project is to expand the mission of Charles R. Drew University to provide additional student services and housing in an effort to make the University a fully-featured residential campus and expand its mission to provide education and employment opportunities to the surrounding community and beyond. The expanded campus will provide jobs for office works, retail, food service, facilities management, and other positions. Approximately 150 fulltime equivalent jobs will be created by the proposed campus expansion project.

Pedestrian-oriented development

The proposed project is located directly across 118th Street from the Charles R. Drew University campus. Thus, the new student housing, athletic facilities, and other support services will be located adjacent to the existing university campus with direct pedestrian access and connectivity promoting a pedestrian-oriented campus that serves university students and staff, as well as the larger community by providing ground-floor commercial and retail uses integrated into the development. Additionally, under a separate but concurrent application, an approximately 800-foot portion of 118th Street, between Compton and Holmes Avenue, is proposed to be vacated and cars removed from the area between the existing campus and the proposed project. The vacated street will serve as a pedestrian promenade and provide a safety pedestrian experience between the existing campus and new development.

There will also be bean extensive network of landscaped pathways throughout the project site. Over 400 new trees will be planted on the project site to provide shaded canopies and reduce heat-island effects from the new impervious surfaces being introduced.

Residents, Senior, Students, and Employees

With its integrated network of open spaces and recreational facilities with programming and events available to the CDU university students, faculty and staff, residents, visiting schools, and the general public, the project provides a full spectrum of amenities to the University and the surrounding community to transform it into a residential campus, thereby expending the higher education experience for the students without displacing access to other uses in the community.

Existing services and infrastructure

The site is serviced by multiple public transit services with LA Metro bus lines on Compton Avenue (Line 53 and 55) and Willowbrook Avenue (Line 202 and 205) and an LADOT Dash line on 120th Street. The Willowbrook A (Blue) Line Station is also located less than a half mile to the east from the project site providing linkage to the regional transportation network. The site is served by existing utilities and will not require upgrades to any services to provide utility service to the site.

The site is essentially flat so there will be minimal grading (111,000 cubic yards of export) needed to construct the facilities.

Exhibit E

B.2. The requested use at the location proposed will not:

a. Adversely affect the health, peace, comfort, or welfare of persons residing or working in the surrounding area;

The project consists of residential, office, educational, and athletic facilities similar to other such uses in the surrounding area. With the exception of the proposed athletic fields, all of the uses will be within enclosed buildings, which will ensure that there are no noise, odors, or other impacts from the residents and occupants of the project on the peace, comfort or welfare of persons residing or working in the area. The project will add amenities, some of which will be available to use by the community, which will add to the healthy wellbeing of the community. The project will activate and redevelop a vacant school property, eliminating an eye sore and safety risk in the community by providing a pedestrian-oriented, mixed-use campus with high-quality architecture within a half-mile of the Willowbrook – Rosa Parks Metro light rail station. The campus expansion project will integrate attractively landscaped and open spaces, plazas, and pathways throughout the campus that are well-shaded and provide pedestrian connections and ground-floor uses to campus users and the surrounding community.

The project will enhance the welfare of the Charles Drew University and the surrounding neighborhood by providing 250 apartment units for students, 200 units of affordable housing, 54 units of senior affordable housing, 55 market-rate housing units. In total, the proposed 559 housing units will help transform CDU from a commuter-only medical school into a residential university with additional, much-needed housing for the larger community. By integrating the proposed campus expansion with ground-floor retail, dining, open space and recreational facilities, the project will become a mixed-used residential and employment center that promotes walkability, reduced VMT and greenhouse gas emissions, and supports greater community safety and activity throughout the day and night.

b. Be materially detrimental to the use, enjoyment, or valuation of property of other persons located in the vicinity of the site; and

For the reasons listed above, the project will also not be detrimental to the use enjoyment or property values of other persons located I the vicinity of the project. The project will provide approximately 150 full times jobs, once completed, provide additional employment opportunities in the community. The project will also train healthcare professionals for the benefit of the Willowbrook area and the entire region. By providing housing for university students, faculty, and staff, the project will also tent to reduce traffic by allowing students and employees of the university to live on-campus, thereby eliminating commuting and traffic from over a 1,000 people at full build-out of the university housing.

The project will introduce new residents to the community who will shop at local establishments, thereby increasing economic vitality of the Willowbrook community. This in turn, will serve to enhance property value I the area as the customer base increases.

The proposed project will enhance the larger community by providing housing and a mixed-use center within walking distance of the Willowbrook – Rosa Parks Metro station. In the end, the project will transform nearly 13 acres from an inaccessible school campus and now vacant property, which had to be circumnavigated by pedestrians in all former cases, to a campus that reconnects the Northwest Subarea of the Specific Plan and allows pedestrian connectivity around and through the site. This link to the community will provide increased access to housing resources, employment opportunities, education, and recreational uses, thereby activating the site at all times of day and increasing "eyes on the street" and enhanced safety to the community. All of these factors are anticipated to bring additional value to the surrounding residential and commercial uses as the CDU Wellness and Education Campus become a thriving center and economic driver in the community.

c. Jeopardize, endanger, or otherwise constitute a menace to the public health, safety, or general welfare.

Public Necessity and Convenience

The Project is in conformity with public necessity and convenience because it not only creates employment opportunities within the Northeast Community Plan area, but it will also accommodate a diverse professional/business entity not currently found in the surrounding community. In addition, the Applicant has expressed interest in extending employment, internship, and job training opportunities to the local community and with the surrounding schools and institutions. Within 0.25 mile, there are 2 secondary school (Pueblo High School and Abraham Lincoln High School).

The proposed Project will locate new commercial uses within walking distance of both single-family and multi-family neighborhoods and within walking distance of nearby public transit. This will allow the Project to serve a greater public necessity and convenience by offering efficient transit alternatives and contributing to building the critical mass necessary to support a more efficient local and regional transit system.

General Welfare

The general welfare is served by the redevelopment of the vacant and school site as an affordable housing for the community and to provision of student housing and support facilities for Charles R. Drew University. The proposed land uses for hosing and a university, permitted by the Conditional Use Permit, will promote the general welfare through job creation, a range of employee levels and high wage positions,

Exhibit E

increased property values, increased tax base, and increased sales tax revenue at surrounding commercial businesses, and increased economic development opportunities for the Willowbrook community.

Good Planning Practices

The Conditional Use Permit conforms with good planning practices in that the proposed land uses be compatible with surrounding commercial and residential designations found in the Willowbrook area.

The proposed project and conditional use permit exemplifies good planning practices as it will create synergy and support Martin Luther King Hospital by facilitating the training of more health care professionals in the community.

Because there are a minimal number of residential uses in the immediate project area, the Project will create a comfortable transition with neighboring residences through the construction of mid-rise housing and university support facilities.

The Project complies with SB 375, AB 32 and SB 32 by contributing to reduced greenhouse gas emissions through integrated land use and transportation planning. One of the key components of the State's mandate to reduce greenhouse gas emissions is the lessening of emissions from passenger vehicles, which represents about one-third of overall greenhouse gas emissions in the United States. Promoting infill opportunities is among the top strategies to reduce such emissions. The Project's location, serviced by multiple bus lines and within 0.5 miles of the Metro A Line Willowbrook Station, will discourage Project employees and visitors from driving to or from the Project Site.

The requested conditional Use Permit allows the project to provide residential and commercial land uses within walking distance of existing neighborhoods and local and regional transit services.

B.3. The proposed site is adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping, and other development features prescribed in this Title 22, or as is otherwise required to integrate said use with the uses in the surrounding area.

The project site includes two development areas separated by 117th Street. With a total area of 12.8 acres, the project site is an adequate size to provide mid-rise residential units and indoor and outdoor athletic facilities. The proposed project is generally consistent with the uses and development standards in the Willowbrook TOD specific Plan and Los Angeles County Zoning Code. The project complies with density, floor area, ground level

yards, open space, parking, landscaping and other development standards in the MU-2 Zone. Amendments to the Specific Plan are being requested to exceed the height limits and to reduce the minimum residential dwelling unit size. These amendments are necessary to provide efficient use of the site for the number of units that are planned. A housing incentive for the senior housing building is also requested to allow the proposed fourth floor of the development to have a zero-foot setback.

B.4. The proposed site is adequately served:

a. By highways or streets improved as necessary to shorten trip length and reduce vehicle miles traveled for the kind and quantity of traffic such use would generate; and

The existing roadway infrastructure is sufficient to accommodate the growth in population and employees associated with the project. The LA County Public Works Department has indicated that no street or sidewalk widening is required on any of the abutting streets. The impacts of traffic on the level of service of nearby intersections will be studied as part of the environmental review process, but there is not expected to be any significant impact in the Vehicle Miles Travelled (VMT) resulting from the project.

The project will add residential uses for students, faculty and staff of the University, which will serve to reduce trips for some students and staff of the University who currently live off-campus. The Site is also served by bus routes and is within 0.5 miles of the Metro A Line Willowbrook station, which will also serve to reduce vehicle trips to the project site and university.

b. By other public or private service facilities as are required.

The project site is located in a built-out urban environment with existing utilities services already in place that served the vacant school buildings on the site. The new development will tie into existing utility infrastructure already in place in the surrounding street. The project will construct any new laterals or other infrastructure to tie into the existing sewers, storm drains, water lines, etc. It is not expected that project demands will exceed the capacity of any of the infrastructure to serve the project.

Exhibit F

LA COUNTY PLANNING

AMY J. BODEK, AICP
Director,
Regional Planning

DENNIS SLAVIN
Chief Deputy Director,
Regional Planning

PROPOSED ENVIRONMENTAL DETERMINATION

DETERMINATION DATE:	March 30, 2026
PROJECT NUMBER:	PRJ2023-002770-(2)
PERMIT NUMBERS:	Specific Plan Amendment No. RPPL2023004093 Development Agreement No. RPPL2023005669 Conditional Use Permit No. RPPL2023004092 Administrative Housing Permit No. RPPL2023004095 Environmental Plan No. RPPL2023004097
SUPERVISORIAL DISTRICT:	2
PROJECT LOCATION:	1667 E. 118th Street, Willowbrook, CA 90059
OWNER:	Compton Unified School District & LA County Development Authority
APPLICANT:	CDU/MLK Wellness Collaborative, LLC
CASE PLANNER:	Bryan S. Moller, Senior Regional Planner bmoller@planning.lacounty.gov

An Addendum to the certified Environmental Impact Report (EIR) for the Willowbrook Transit Oriented District Specific Plan was prepared in compliance with the California Environmental Quality Act (CEQA) and the County environmental guidelines to account for the proposed project. The Addendum concluded that the project as proposed would not result in any increased or additional environmental impacts beyond those which were analyzed in the EIR and therefore concluded that supplement environmental analysis was not required.

Attached: EIR Addendum
Mitigation Monitoring and Reporting Program (MMRP)
Final EIR – Willowbrook Transit Oriented District Specific Plan

Exhibit F

Final

CDU WELLNESS AND EDUCATION CAMPUS

Addendum to Willowbrook Transit Oriented District Specific Plan Final Program Environmental Impact Report (State Clearinghouse Number 2015101106)

Project No. PRJ2023-002770-(2)
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Prepared for
County of Los Angeles
Department of Regional Planning and
CDU/MLK Wellness Collaborative, LLC

September 2025

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Final

CDU WELLNESS AND EDUCATION CAMPUS

Addendum to Willowbrook Transit Oriented District Specific Plan Final Program Environmental Impact Report (State Clearinghouse Number 2015101106)

Prepared for
County of Los Angeles
Department of Regional Planning and
CDU/MLK Wellness Collaborative, LLC

September 2025

CDU Wellness and Education Campus
Project Number - R2015-02007-(2)
Environmental Assessment Number - RENV201500136

Willowbrook Transit Oriented District Specific Plan
Project Number R2015-02007-(2)
Environmental Assessment Number RENV201500136

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CHAPTER 1
Introduction

1.1 Purpose of this Addendum to Final Program EIR

This Addendum to the Final Program Environmental Impact Report (Final PEIR) for the Willowbrook Transit-Oriented Development Specific Plan (Specific Plan) (State Clearinghouse Number 2015101106) has been prepared for the County of Los Angeles as the California Environmental Quality Act (CEQA) Lead Agency to determine if the Charles R. Drew University of Medicine and Science (CDU) Wellness and Education Campus (Proposed Project)may have a significant effect on the environment.

This Addendum to Final PEIR for the Proposed Project has been prepared for the County of Los Angeles as the California Environmental Quality Act (CEQA) Lead Agency to determine if the Proposed Project may have a significant effect on the environment.

This Addendum includes a comparison of the environmental impacts associated with the construction and operation of the Proposed Project to the environmental impacts identified in the Specific Plan Final PEIR. The analysis was prepared to determine, based on substantial evidence in light of the whole record, whether the environmental CEQA processing for the Proposed Project requires compliance with Section 15162 of the CEQA Guidelines (Subsequent EIRs and Negative Declarations), Section 15163 of the CEQA Guidelines (Supplement to an EIR), or Section 15164 of the CEQA Guidelines (Addendum to an EIR or Negative Declaration). The analysis supports the use of an Addendum to the Final PEIR for the Proposed Project.

The Project Applicant (Applicant) is CDU/MLK Wellness Collaborative, LLC (CMWC), which is comprised of CDU and Century Affordable Development Inc. (CADI). The Applicant intends to lease the Proposed Project site (Project site) from the Compton Unified School District.

1.2 CEQA Authority

The California Environmental Quality Act (CEQA) establishes the type of environmental documentation required when changes to a project occur after an EIR is certified. Specifically, Section 15164(a) of the CEQA Guidelines states that:

> The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.

Section 15162 of the CEQA Guidelines requires a Subsequent EIR when an EIR has been certified or a negative declaration has already been adopted or an EIR has been certified and one or more of the following circumstances exist:

> Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
>
> Substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
>
> New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
>
> > The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
> >
> > Significant effects previously examined will be substantially more severe than shown in the previous EIR;
> >
> > Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
> >
> > Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

In addition, California Public Resources Code (PRC) Section 21166 states that unless one or more of the following events occur, no subsequent or supplemental environmental impact report shall be required by the lead agency or by any responsible agency:

a. Substantial changes are proposed in the project which will require major revisions of the environmental impact report;
b. Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report; or
c. New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.

As demonstrated by the analysis within this Addendum, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact. Further, there is no new information of substantial importance, which was not known and could

not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3). Based on this determination, the Proposed Project does not meet the requirements for preparation of a Subsequent or Supplemental EIR pursuant to Section 15162 of the CEQA Guidelines and Public Resources Code Section 21166.

1.3 Overview of Approved Project

The purpose of the Specific Plan is to (1) increase walking, bicycling, and transit ridership and reduce vehicle miles traveled (VMTs); (2) facilitate compact, mixed use development; (3) increase economic activity; (4) facilitate the public investment of infrastructure improvements; and (5) streamline the environmental review process for future infill development projects. The Specific Plan encourages urban infill development on vacant or underutilized sites; promotes and encourages transit-oriented development along major transportation corridors; encourages mixed use development to facilitate the linkage between housing and employment opportunities; and promote increased residential density in appropriately designated areas. The Approved Project is the Willowbrook Transit Oriented District Specific Plan and is a program that is established for the long-term development of the Specific Plan area. Within this Addendum, the Specific Plan is also identified as the Specific Plan Program.

1.4 Overview of Proposed Project

The Proposed Project includes 13 individual development areas encompassing approximately 12.8 acres. These development areas include a synergistic mix of uses that include an expansion of the CDU Campus and the development of affordable senior housing and affordable housing. The campus expansion includes the development of market-rate student housing, market-rate faculty/staff housing, office, commercial and community uses, athletic facilities, and structured parking. With the CDU Campus expansion, the Proposed Project advances the CDU mission by increasing the cultivation of diverse health professionals dedicated to social justice and health equity for underserved populations. Additionally, the new 254-unit affordable housing component supports CADI's mission by providing quality, affordable housing that fosters vibrant communities and supports economic stability for low- and moderate-income households. Designed to foster a campus-like atmosphere, the Proposed Project integrates pedestrian pathways and a unified approach to landscaping, creating a complete community that supports connectivity, accessibility, and a sense of belonging.

1.5 Availability and Adoption Process

In accordance with CEQA Guidelines Section 15164(c), an addendum to an EIR need not be circulated for public review but can be included in or attached to the certified EIR. The decision-making body must consider the addendum with the certified Final PPEIR prior to making a decision on the Proposed Project (CEQA Guidelines Section 15164(d)).

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CHAPTER 2
Project Description

2.1 Introduction

The Applicant's objective is to construct and operate the Proposed Project to provide educational opportunities and support for CDU, affordable housing, recreational facilities, and employment generating opportunities. The Project site is comprised of property with the following and future ownership:

1. The Compton Unified School District (CUSD)-owned site located at 1667 East 118th Street, Los Angeles, California 90059 (Assessor's Parcel Nos. 6149-012-901, 6149-014-900, 6149-014-903, and 6149-014-904) (CUSD Property). The CUSD is intending to lease the property to CMWC; and,
2. The Los Angeles County Development Authority (LACDA) currently owned site (Assessor's Parcel No. 6149-014-906) (LACDA Property). LACDA is intending to transfer the Property to the County of Los Angeles who is planning to lease the property to the CUSD who in turn is planning to sublease the property to CMWC.

In 2019, LACDA explored the feasibility of redeveloping the CUSD Property as well as the LACDA Property. Later in 2019, LACDA determined that redevelopment of the Project site was feasible, issued a request for proposal, and selected the Applicant's proposed development of the Project site. Various approvals to facilitate the proposed development will be required to be processed through the County of Los Angeles, which includes an evaluation in accordance with CEQA.

As part of the Applicant team, it is CDU's objective to enhance its existing educational facilities for its students who are enrolled in undergraduate, graduate, and certificate programs. CDU is a private, non-profit, student-centered University that is committed to cultivating diverse health professionals as leaders who are dedicated to social justice and health equity for underserved populations through education, research, clinical service, and community engagement.

2.2 Proposed Project Location

The Proposed Project is located within the unincorporated community of Willowbrook approximately 10 miles south of downtown Los Angeles (**Figure 2-1,** *Regional Location*). The community is bounded by the cities of Los Angeles to the north, Hawthorne to the west, Lynwood to the east, Gardena to the southwest, and Compton to the southeast. Interstate 110 (I-110) defines the community's western boundary and Interstate 105 (I-105) is the northern boundary. The Proposed Project is located within the Specific Plan area that encompasses 312

acres in the northwestern portion of the Willowbrook community. The Specific Plan area generally encompasses parcels located south of Imperial Highway, north of East 122nd Street, east of Compton Avenue, and west of South Mona Boulevard. The Project site encompasses approximately 12.8 acres within the northwestern portion of the Specific Plan and is bound by I-105 to the north, Compton Avenue to the west, East (E.) 118th Street to the south and existing parking located approximately 550 feet west of Holmes Avenue (**Figure 2-2,** *Proposed Project Location*). The portion of the Project site located north of E. 117th Street (LACDA Property) encompasses approximately 1.3 acres. The portion of the Project site located south of E. 117th Street (CUSD Property) encompasses approximately 11.5 acres.

2.3 Proposed Project Objectives

The land uses within the Proposed Project are consistent with the uses identified for the Approved Specific Plan. The specific objectives for the Proposed Project are to:

- Expand an existing community serving university
- Provide new affordable and senior affordable housing options in proximity to existing public transit infrastructure
- Provide employment opportunities
- Provide direct and safe pedestrian access and connectivity between the existing CDU campus and the Project site with a new pedestrian promenade.
- Provide recreational opportunities for CDU students, faculty and staff as well as the community

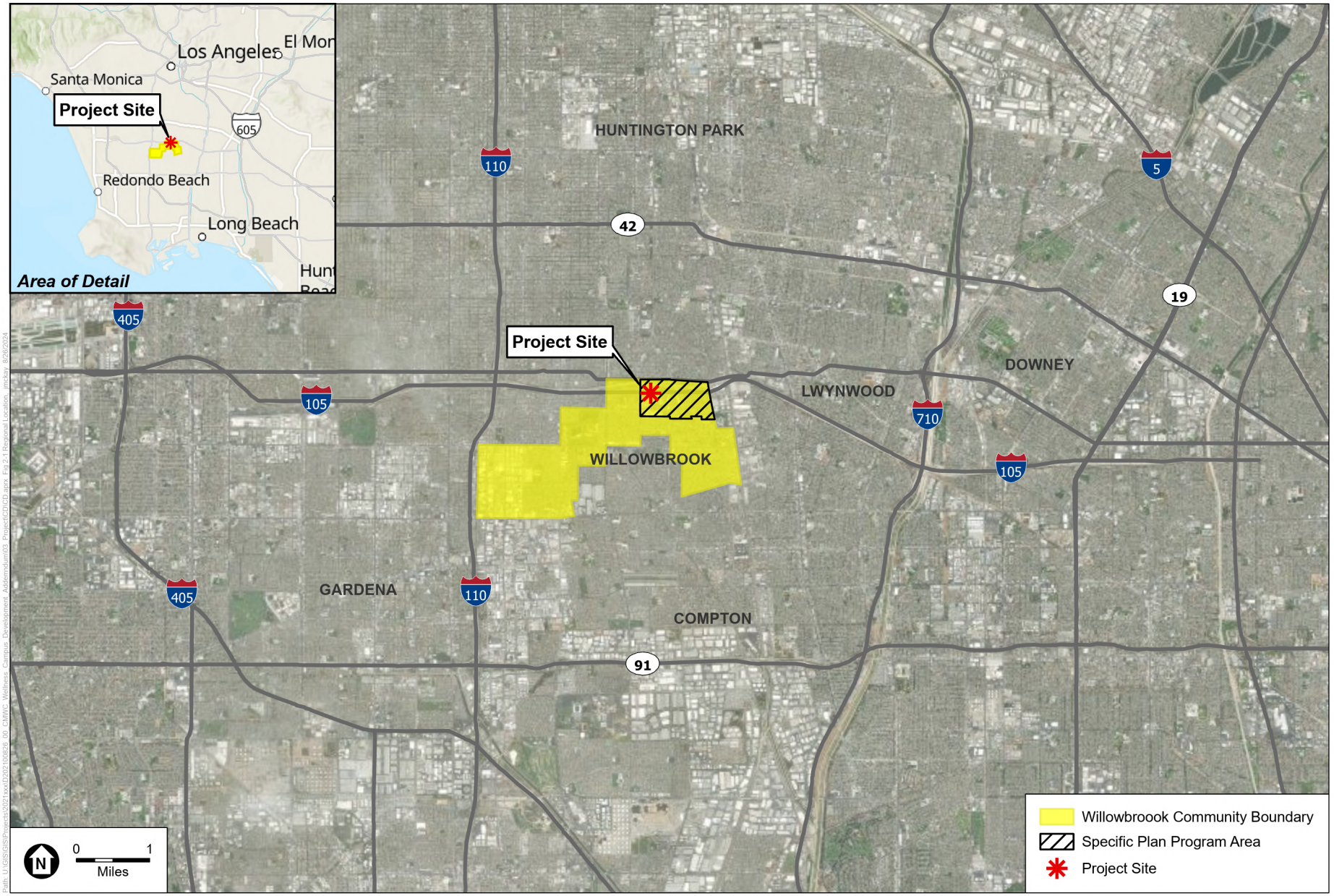
2.4 Proposed Project Characteristics

2.4.1 Overview

The approximately 12.8-acre Project site is part of the Specific Plan. The Specific Plan identifies the Project site as within the "Northwest Subarea" that may provide a variety of housing options for current and future workers, residents in the area and university/student housing. The Specific Plan also encourages employment generating uses within this subarea, "such as medical back office, laboratory facilities, hospital equipment facility, medical or university support businesses, etc. that provide job opportunities for both local residents and others." The current zoning within the Specific Plan for the entire Project site is Mixed Use 2 (MU-2).

Consistent with the general vision for the Northwest Subarea, the MU-2 zone is generally intended to provide commercial and residential development, with an emphasis on employment generating uses and residential infill development, such as an office or business park and residential mixed-use developments, with open space components and pedestrian connection to the Willowbrook/Rosa Parks Station, CDU and the MLK Medical Campus. Schools, including accessory facilities, associated with a college or university (i.e., CDU) are uses that are conditionally permitted within the MU-2 land use designation.

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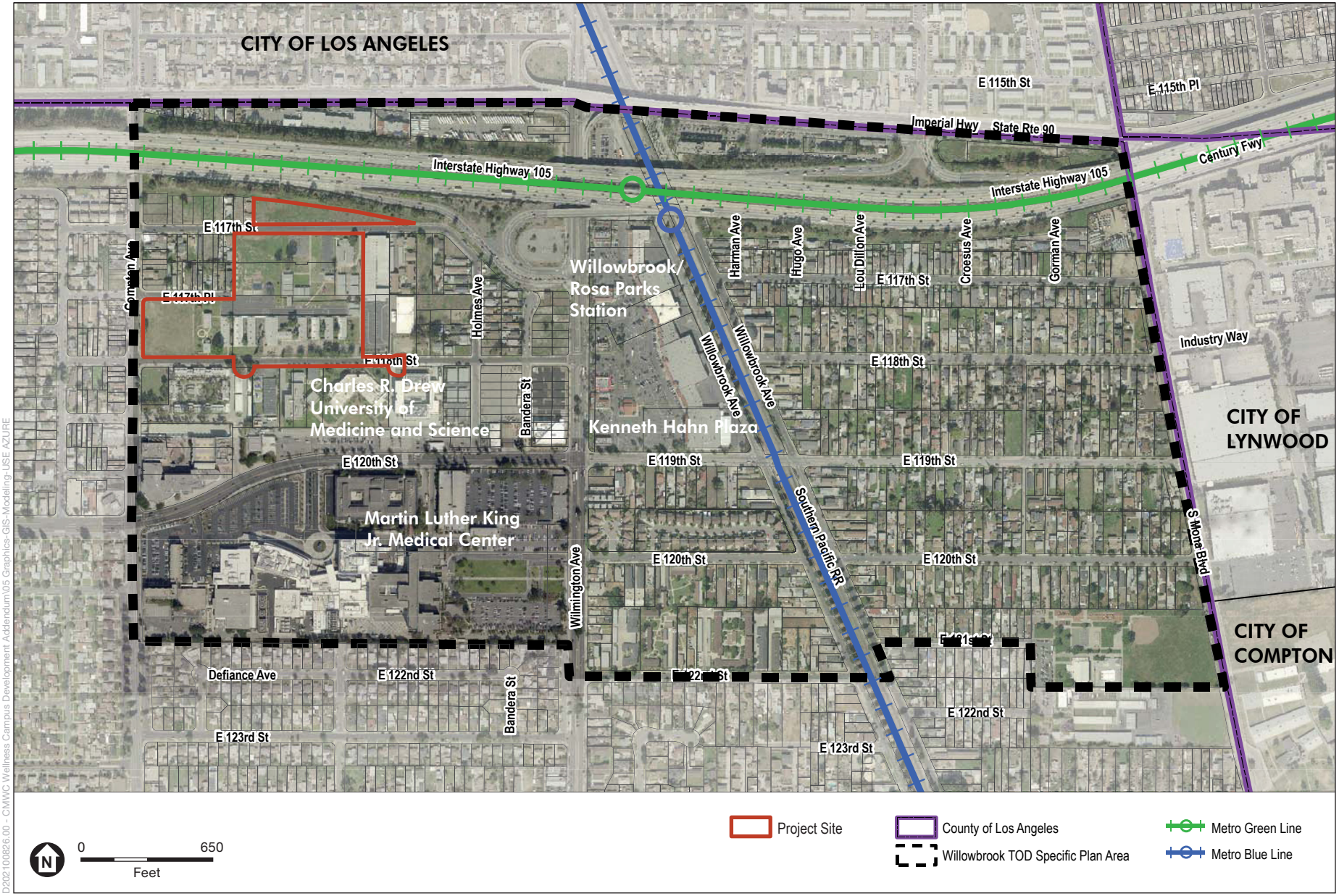
SOURCE: ESA, 2024

CDU Wellness and Education Campus

Figure 2-1
Regional Location

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SOURCE: Willowbrook TOD Specific Plan

CDU Wellness and Education Campus

Figure 2-2
Proposed Project Location

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The Specific Plan Final PEIR evaluated residential and non-residential development throughout the Specific Plan area. The Project site is located in development areas identified as Group Locations 3E and 3F as shown in Figure 2-6 of the Specific Plan Final PEIR. The Project site boundary fully encompasses approximately 11.5 acres identified as Group Location 3E. The Project site encompasses approximately 1.3 acres of the approximately 1.67 acres identified as Group Location 3F. **Table 2-1,** *Development Evaluated in Specific Plan Final Program EIR,* shows the amount of development within each Group Location that was evaluated within the Specific Plan Final PEIR.

TABLE 2-1
DEVELOPMENT EVALUATED IN SPECIFIC PLAN FINAL PROGRAM EIR

Specific Plan Group Location # and Land Use	Development Evaluated In Specific Plan Final Program EIR
Group Location 3E[a]	
Residential (DU)	553
Non-Residential (SF)	375,433
Group Location 3F[a]	
Residential (DU)	145
Non-Residential (SF)	98,494
Total Group Locations 3E and 3F[b]	
Residential (DU)	698
Non-Residential (SF)	473,927
Total Existing Uses within Group Locations 3F[c]	
Residential	106
Non-Residential	0
Total Development Evaluated within Group Locations 3E and 3F Without Existing Uses[d]	
Residential	592
Non-Residential	473,927

NOTES:

DU – Dwelling Unit

SF – Square Feet

a. The amount of development within Group Location 3E and Group Location 3F are derived from Table 2-3 in the Willowbrook Transit-Oriented District Specific Plan Final PEIR.
b. The amount of development evaluated in the Specific Plan Final PEIR for Group Locations 3E and 3F includes existing uses within Group Location 3F.
c. These existing uses within Group Location 3F encompasses the entirety of the area located outside of the Project site. These existing uses include 106 residential units comprising of a 100-unit apartment complex currently under construction and three 2-unit residential uses. The total amount of existing development within Group Location 3F represents a portion of the development evaluated in the Specific Plan Final PEIR.
d. The total existing development within Group Location 3F was subtracted from the total development within Group Locations 3E and 3F evaluated in the Specific Plan Final PEIR to derived the amount of development remaining to be constructed within Group Locations 3E and 3F.

SOURCE: ESA, 2024

2.4.2 Proposed Land Uses

The Proposed Project includes a synergistic mix of uses that include the development of affordable senior housing, affordable housing, market-rate faculty/staff housing, market-rate student housing, office, commercial and community uses, athletic facilities, and subterranean, ground level, and structured parking (**Figure 2-3,** *Proposed Project Site Plan*). The housing units are proposed within nine buildings. The market-rate faculty/staff housing, market-rate student housing, office, commercial and community uses, athletic facilities, and the parking structure will extend CDU's campus facilities north of E. 118th Street. The Proposed Project is intended to foster a campus-like atmosphere with integrated pedestrian pathways and a unified approach to landscaping. The proposed uses are identified in **Table 2-2,** *Proposed Project Uses*.

TABLE 2-2
PROPOSED PROJECT USES

Proposed Project Uses	Size/Quantity
Affordable Housing and Parking (Buildings A1-A4)	Building A1: 47 units, 52,500 sf, 24 parking spaces, 4-story structure Building A2: 47 units, 52,500 sf, 24 parking spaces, 4-story structure Building A3: 53 units, 58,700 sf, 29 parking spaces, 4-story structure Building A4: 53 units, 58,700 sf, 29 parking spaces, 4-story structure
Affordable Senior Housing and Parking (Building. A5)	54 units, 44,100 sf, 27 parking spaces, one 4-story structure
Market Rate Student Housing, Community Use and Retail (Buildings. U1-U3)	Building U1: 72 units, 70,500 sf, 5-story structure Building U2: 70 units, 67,500 sf, 5-story structure Building U3: 108 units, 95,500 sf, 5-story structure, (including 5,000 square feet of CDU and community use, 10,270 square feet of university-oriented retail use)
Market Rate Faculty/Staff Housing (Building U4)	55 Units, 54,750 sf, one 5-story structure
Athletics Field (Area U5)	100 yards by 60 yards, 6 Light Standards with soccer and other sport infrastructure
Athletics Facilities (Building U6)	43,100 square feet including swimming pool, basketball court, exercise rooms, run/walk path, and support facilities, one 1-story building with mezzanine
Office, Community Use and Parking (Building U7)	116,000 square feet of office use, 5,000 square feet of CDU and community use (121,000 sf total), 84 parking spaces, one 5-story structure
Parking Structure (Building U8)	637 spaces, 112-foot, 8-story structure, plus rooftop parking, PV panel array on canopy structure, and 11,500 square feet of school storage and office uses,
East 118th Street Pedestrian Promenade	Approximately 700 linear feet of decoratively paved open space for pedestrian and bicycle travel
Total Proposed Project Development	**559 residential units and 432,910 non-residential square feet**

SOURCE: CMWC, 2024

The total development within Groups 3E and 3F does not include the existing 106 residential units that encompass the entire area located outside of Group 3F.

Exhibit F



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SOURCE: Fredrick Fisher and Partners, 2023; ESA, 2024

CDU Wellness and Education Campus

Figure 2-3
Project Site Plan

ESA

Affordable Housing (Buildings A1-A4)

The Proposed Project includes four, 4-story buildings and maximum 50 feet in height with a total of 200 units (196 affordable housing units for families earning up to 80 percent of the Area Median Income [AMI] and four exempt manager's units). These buildings are identified as Buildings A1, A2, A3, and A4. The proposed unit mixes comprise of one, two, and three bedroom units. The one-bedroom units will be a minimum of 530 square feet, two-bedroom units will be a minimum of 800 square feet, and three-bedroom units will be a minimum of 1,075 square feet.

The ground-level podium parking includes 106 parking spaces, which represents 0.5 parking spaces per unit. This parking allocation is lower than the required parking ratio as defined within the Specific Plan. However, with the adoption of Assembly Bill AB 2097, minimum parking requirements are not required for the Proposed Project because the Project site is located within 0.5-mile of a major transit stop (i.e.,Willowbrook/Rosa Parks metro rail station).

Separate vehicular access to each of the four buildings (Buildings A1 through A4) will be provided by the north-south accessway between E. 117th Street and E. 118th Street. The four buildings providing affordable housing include central courtyards.

Affordable Senior Housing (Building A5)

The Affordable Senior Housing consists of a single four-story elevator served building totaling 54 units with ground level podium parking identified as Building A5 on the site plan. The affordable housing unit mix is comprised of 53 one-bedroom units for seniors earning up to 80 percent AMI and one exempt two-bedroom manager's unit. This building will be located on the western edge of the site fronting Compton Avenue between 117th Place and 118th Street. The maximum building height of Building A5 will be 50 feet. The one-bedroom units will be a minimum of 530 square feet each. The ground-level podium parking includes 27 parking spaces, which represents 0.5 parking spaces per unit. This parking allocation is lower than the required parking ratio as defined within the Specific Plan. However, with the adoption of Assembly Bill AB 2097, minimum parking requirements are not required for the Proposed Project because the Project site is located within 0.5-mile of a major transit stop. Vehicular access to the senior housing units is from E. 117th Place. As described above, a housing Incentive is requested to provide zero-foot step-back on the fourth floor of Building A5 with frontage on Compton Avenue in lieu of a 10-foot step-back on the fourth floor.

Student Housing (Buildings U1-U3)

There are three market-rate residential apartment buildings (Buildings U1, U2 and U3) with a total of 250 units) proposed to accommodate student housing for graduate and undergraduate students attending CDU. Student housing Building U1 will include 72 units and Building U2 will include 70 units (142 total units), which will be comprised of one-, two-, and three-bedroom units. Building U3 will include approximately 108 suites that will accommodate up to 408 beds. The units in Building U3 will consist of smaller one-and two-bedroom units than in Buildings U1 and U2. Each bedroom in Building U3 is also intended to accommodate two students instead of one per bedroom in Buildings U1 and U2. The ground floor of the student suites in Building U3 will

include a total of 5,000 square feet of community space within four spaces ranging from 800-1,900 square feet and 10,270 square feet of university-oriented retail with two retail spaces (one space being 2,750 square feet and one being 7,520 square feet). The ground floor community spaces will be for university-oriented programs and events and spaces for outside community groups to use for meetings and other types of events. The university-oriented uses are a typical ancillary use customarily associated with community-founded universities with a mission to support the health and wellbeing of the surrounding community. These will be flexible spaces that will accommodate varying university events that will include public and university participants. Types of events will vary including, but not limited to lectures, workshops, and entertainment activities. One of the spaces might include a teaching kitchen area to support CDU's focus on community wellness and health education. These indoor campus activities may take place between the hours of 6:00 am and 11:00 pm, seven days a week. The spaces may also be used for non-university related events when the spaces are not in use by the university. CDU will allow community groups to use the spaces for gatherings, meetings, classes, and other activities through a reservation system. Use by outside organizations will also take place during the normal business hours of the university (6:00 am to 11:00 pm, seven days a week). Based on the size of the current spaces as shown on the proposed plans, occupancy of the community spaces will range from 114 to 271 people depending on which room is used. As design development progresses, larger occupancies may be possible if certain spaces are combined or rearranged.

The university-oriented retail will serve the needs of students living within the student housing buildings, and also the wider CDU campus student, staff, and faculty needs including café, bookstore, coffee shop, student study areas, media center or other similar uses. Hours of operation will be between 6:00 am to 11:00 pm, conforming to the requirements of the Specific Plan. Each of the three student housing buildings are proposed to have five floors with a maximum height of 70 feet to be accommodated through a Specific Plan amendment to modify the current building height maximum in the MU-2 zone of 50 feet to 70 feet and no story limitation. Parking for student housing will be provided by the 637-space parking structure proposed along E. 117th Street.

Faculty/Staff Housing (Building U4)

The Proposed Project includes one market rate apartment building (Building U4) with 55 housing units that are intended to be available for faculty/staff housing for CDU. The proposed building will include five floors with a maximum height of 70 feet. To accommodate the proposed building height, a Specific Plan amendment is proposed to modify the current building height maximum in the MU-2 zone of 50 feet to 70 feet and no story limitation. The housing units will be intended for workers that have jobs in proximity of the CDU campus. The proposed units include one, two and three bedrooms. The one-bedroom units will be a minimum of 530 square feet, two-bedroom units will be a minimum of 800 square feet, and three-bedroom units will be a minimum of 1,075 square feet. Parking spaces for the Faculty/Staff housing will be provided by the 637-space parking structure proposed along E. 117th Street.

Athletic Field (Area U5)

The proposed athletics field will be used primarily as a soccer field, but it will also serve as a multi-purpose and functional space for other recreational and inter-mural sport uses. The field

design is based upon California Interscholastic Federation (CIF) regulation soccer field, with dimensions of 100 yards by 60 yards. The areas surrounding the athletic field may include garden spaces and walking path, along with student gathering and viewing areas. Seating areas will be incorporated into the design, for daily use by CDU students and occasional use for CDU and public events on the athletic field through the use of landscaped mounds around the field. There will be no permanent or fixed bleacher seating areas around the field. The primary use of the field is for recreation for CDU students, staff, faculty and their visitors. The athletics field will also be available to the public through scheduling with CDU. The field will be used during normal university hours of 6:00 am to11:00 pm (seven days a week)

Construction of the athletic field is anticipated to be one of the initial Proposed Project components that will be constructed. As part of this Proposed Project component, temporary facilities to support the athletic field will be provided on-site. These include portables for security services and bathrooms as well as temporary parking. Temporary lighting will be provided for these temporary uses.

Other ancillary CDU functions may also utilize the field including functions that are currently held on the CDU campus. These events primarily involve faculty/staff, students, their families, and guests. These functions could include new student orientations, student gatherings, CDU graduation, Empowerment Congress, CDU white coat ceremonies and other similar events. CDU white coat ceremonies are held throughout the year for different programs and disciplines. These events include faculty, students, families and guests to honor incoming medical and science students and may include several hundred to a thousand participants. They include speakers, presentations, and may include entertainment as part of the programs. White Coat ceremonies are traditional events associated with medical and science schools and are currently being conducted throughout the existing campus at different times of the year.

The athletic field may also be used for occasional entertainment events open to the university and community that will utilize amplified sound. One such event is Jazz at Drew (an annual one-day weekend concert event held in September each year) to raise funds to support scholarships, student support services, and pipeline programs. Jazz at Drew is currently held on the existing CDU campus. This event typically draws about 1,000 guests and may be relocated to the athletic field. The event typically runs from 12:00 pm to 8:30 pm.

Similar to the athletic building, the athletic field may be scheduled for public use by local organizations or neighborhood community. The scheduling of the athletics field for public and community use may be pursuant to a rental or other appropriate use agreement managed by CDU. CDU will have a joint-use agreement with CUSD to allow for school district use of the field at times to be determined in the future. This community use of the field could include local soccer leagues, CUSD schools and King Drew Magnet soccer or other school-related gatherings and is typically expected to be used by the community and the public during weekends and in the late afternoons or early evenings during the week. The use of the field by any outside organization will not extend beyond the normal university business hours of 6:00 am to11:00 pm (seven days a week).

Portable seating may be brought in for such community events. The community use of the field will be secondary to the use by CDU, including students, staff, faculty and their visitors. When the field is not used for programed sports or events, it will be available for general unstructured student/faculty recreational use from 6:00 am to 11:00 pm. It will not be open to the general public for general unstructured recreation use when not used for programed sports or events. The university will develop a program to allocate time for the use of the field between university organized sports, unstructured student use, community group use, and special events prior to the completion of construction of the field.

Consistent with the approved Traffic Impact Analysis for the Proposed Project, events involving more than 500 attendees will be required to obtain an Event Management Plan approval issued by the County Public Works Department.

Light standards will be provided at the field to allow nighttime use, practices, games and events. Separate lighting will be provided for general nighttime security lighting. Light for use of the athletic field will be locally controlled and manually to turn on and off for nighttime use and events. Field lighting, with a total of 6 light standards will be installed, with 3 standards on either side of the field. These lights will utilize LED bulbs with light shields to prevent light from drifting outside the athletic field area. Nighttime security lighting will be provided for the site area and walking paths. The adjacent proposed buildings will help reduce any light or noise intrusion into the neighborhoods outside the Project site boundaries. The scheduling of the field will be maintained by CDU, subject to the terms of the Development Agreement. Hours of operation will be from 6:00 am to 11:00 pm, which will comply with the requirements of the Specific Plan.

Athletics Building (Building U6)

On the south side of East 117th Street, one two-story 43,100-square-foot athletics building with a ground-floor central breezeway connecting its two wings is proposed to include a swimming pool, basketball court, exercise rooms, walk/run track, and associated support facilities. The proposed 25-yard pool facility wing will contain approximately 22,500 square feet and will include seating for guests, swimmers and visitors, restrooms, locker rooms, fitness rooms, storage and other facilities. The pool facility will include up to 300 permanent, temporary or retractable bleacher seats for players, visitors and spectators. The proposed gymnasium wing will contain approximately 20,600 square feet with a regulation NBA size basketball court (94 feet by 50 feet), and while primarily used for basketball, could be used for other sports and events. The gymnasium facility will include up to 378 permanent, temporary or retractable bleacher seats for players, visitors and spectators. The building will be approximately 27 feet tall. Hours of operation will coincide with CDU's hours of operation and may be available for public use between 6:00 am and 11:00 pm, when not in use by CDU and visitors. This schedule is compliant with the Specific Plan.

The facilities within the athletics building will be for use by CDU students, staff, faculty and their guests. However, the swimming pool and gymnasium may be available for non-university organizations or neighborhood community use in a manner similar to the athletic field. Community use of the facilities within the athletics building could include use by CUSD schools,

King Drew Magnet School, and other local school events. The community use of the athletic building will typically be expected to occur during daytime hours, the late afternoons and evenings during the weekdays, and during the day and evenings on weekends. The scheduling of the swimming pool and gymnasium for community use may be pursuant to a rental or other appropriate use agreement managed by CDU. Similar to how a YMCA recreational center operates, the university will develop a program to allocate time for the use of the swimming pool, gymnasium, and other facilities within the athletic building between university-organized sports, unstructured student use, community group use, and special events prior to the completion of construction of the building.

Consistent with the approved Traffic Impact Analysis for the Proposed Project, events involving more than 500 attendees will be required to obtain an Event Management Plan approval issued by the County Public Works Department.

The breezeway between the two primary spaces will facilitate access from the parking structure on the north side of E. 117th Street through to the athletic field located south of the athletics building. This breezeway may be gated to provide after-hour security. Ground-floor restrooms will be accessible from the outside, for shared use with the athletic field. Parking spaces for the athletics building will be provided by the 637-space parking structure proposed along E. 117th Street.

Office Building (Building U7)

Within the northwestern portion of the Project site, a five-story, 121,000-square-foot building with a maximum height of 70 feet is proposed. The building height is proposed to be accommodated through a Specific Plan amendment to modify the current building height maximum of 50 feet to 70 feet and no story limitation. The building will include approximately 116,000 square feet of office space. The type of proposed office uses include general office, research, and clinical. The building will include a ground-floor pedestrian entrance on E. 117th Street and vehicular access to below-grade parking. Approximately 84 below-grade parking spaces will be provided, with the remaining 37 required parking spaces provided within the 637-space parking structure on the north side of E. 117th Street.

Community uses are also proposed within the five-story office building in the northwest portion of the building. This community-oriented space will encompass 5,000 square feet on the ground level and will be designated for CDU's Pipeline Program offices, gathering space and storage. The Pipeline Program includes Science, Technology, Engineering and Mathematics (STEM) programs, including Saturday Science Academy, for K–12 students. The office building and Pipeline Program spaces will include access to outdoor spaces on the south side of the building. Pathways will connect to other uses on the Project site. This type of space is a typical ancillary use, customarily associated with community-founded universities with a mission to support the health and wellbeing of the surrounding community. This will be flexible space that will accommodate various university and community programs, as described above. These campus activities may take place between the hours of 6:00 am and 11:00 pm, seven days a week.

Parking Structure (Building U8)

The Proposed Project includes an eight-level plus roof top parking, 253,540-square-foot, 637-stall parking structure north of E. 117th Street and adjacent to I-105. The maximum height of the parking structure, including photovoltaic array, will be approximately 110 feet above the average grade of the site. A Specific Plan amendment is proposed to accommodate the total height of the structure. The parking structure is proposed to be utilized by CDU students, staff, and faculty, office tenants, faculty/staff and student housing residents, and those using the athletics facility and field. The parking structure will also be used by those visiting the campus and utilizing existing as well as proposed facilities. The affordable housing and affordable senior housing buildings will have their own parking and are not intended to utilize the parking structure. The parking structure could be used by visitors associated with CDU, authorized community users of the athletic field and athletic facilities. On the ground floor and second floor of the parking structure, there will be a total of 11,500 square feet for CDU facilities storage and office area.. The office and storage area will include both building and site facilities, including grounds maintenance equipment for the proposed CDU portion of the proposed development along with the existing CDU Campus. The parking structure will provide electric vehicle (EV) parking spaces as well as charging stations in accordance with the California Building Code (CBC) and Los Angeles County Green Building Code. Based on the current estimated parking spaces for residential uses (377 spaces) and non-residential uses (260 spaces) within the proposed parking structure, there will be a total of 83 EV parking spaces. The ultimate number of EV spaces as well as charging stations will be based on the version of the California Building Code (CBC) and Los Angeles County Green Building Code at the time of building permit issuance. The roof of the parking structure will include photovoltaic panels (PV) and their associated mounting structures that will reach a maximum height of 15-feet 7-inches above the roof grade.

2.4.3 Lighting

All outdoor lighting, including the light standards for the athletic field, will be designed so that spillover lighting onto existing residentially zoned lots or open space zoned lot will be less than 0.8 foot-candles, as required by the Specific Plan. Lighting will utilize a range of energy-efficient fixtures and applications, including, but not limited to bollard lights, pedestrian-scaled pole lights, exterior building lighting, athletic field, and catenary lighting.

2.4.4 Vehicular and Transit Circulation

Regional access to the Project site will be primarily provided by I-105 at the Wilmington Avenue ramps and South Central Avenue ramps as well as the Metro public transit (A Line [formally Blue Line] and C Line [formally Green Line] that intersect at the Willowbrook/Rosa Parks station located within 0.5 mile of the Project site, and Metro Local Bus Lines 53 and 55. Local access to the Project site is currently provided by Compton Avenue, Wilmington Avenue, E. 118th Street, E. 117th Place, and E. 117th Street. Both Metro Bus Lines 53 and 55 currently travel south on Compton Avenue to E. 120th Street and ultimately to the Willowbrook/Rosa Parks station. Through a separate street vacation application, the Proposed Project also includes the vacation of a portion of E. 118th Street along the majority of the southern boundary of the Project site (approximately 700 linear feet). The proposed vacation will eliminate vehicular travel in favor of

a pedestrian promenade that will primarily allow pedestrian and bicycle travel. A drop-off/turnaround is proposed accessible from Compton Avenue along the western portion of E. 118th Street to allow for drop-off, pedestrian loading or deliveries. A second drop-off/turnaround is proposed adjacent to the existing CDU surface parking lot on the north and south sides of E. 118th Street. The E. 118th Street pedestrian promenade will include landscape and seating areas adjacent to the proposed buildings on the north and south sides as well as pedestrian walkways and bicycle lanes.

In addition, the Proposed Project will include periodic use of the pedestrian promenade for special events, such as a weekly farmer's market, book fair, health fair, and other community events. Some of these events and activities may be events and/or activities customarily incidental to a university that already occur on other parts of the CDU campus. These campus activities may take place between the hours of 6:00 am and 11:00 pm, seven days a week and may utilize localized amplified sound as part of the activities. As part of the setup for such events, vehicle access through the promenade will be allowed. Vehicle access may also be granted for CDU student housing move-in/move-out days. Subsequent to the construction of a driveway access off of E. 117th Street into the existing parking structure, which is part of a separate CDU project that has been approved, the existing driveway on E. 118th Street into the CDU parking area and parking structure will be closed during special events and vehicles parking for the events will access the existing parking area off of E. 117th Street.

Fire access roads for emergency access are proposed within the Project site that extends from E. 117th Street to the pedestrian promenade, as well as to E. 117th Place. Fire access roads from E. 117th Place and along the east side of the proposed affordable housing buildings will also provide access to ground-level parking spaces for affordable housing residents and guests.

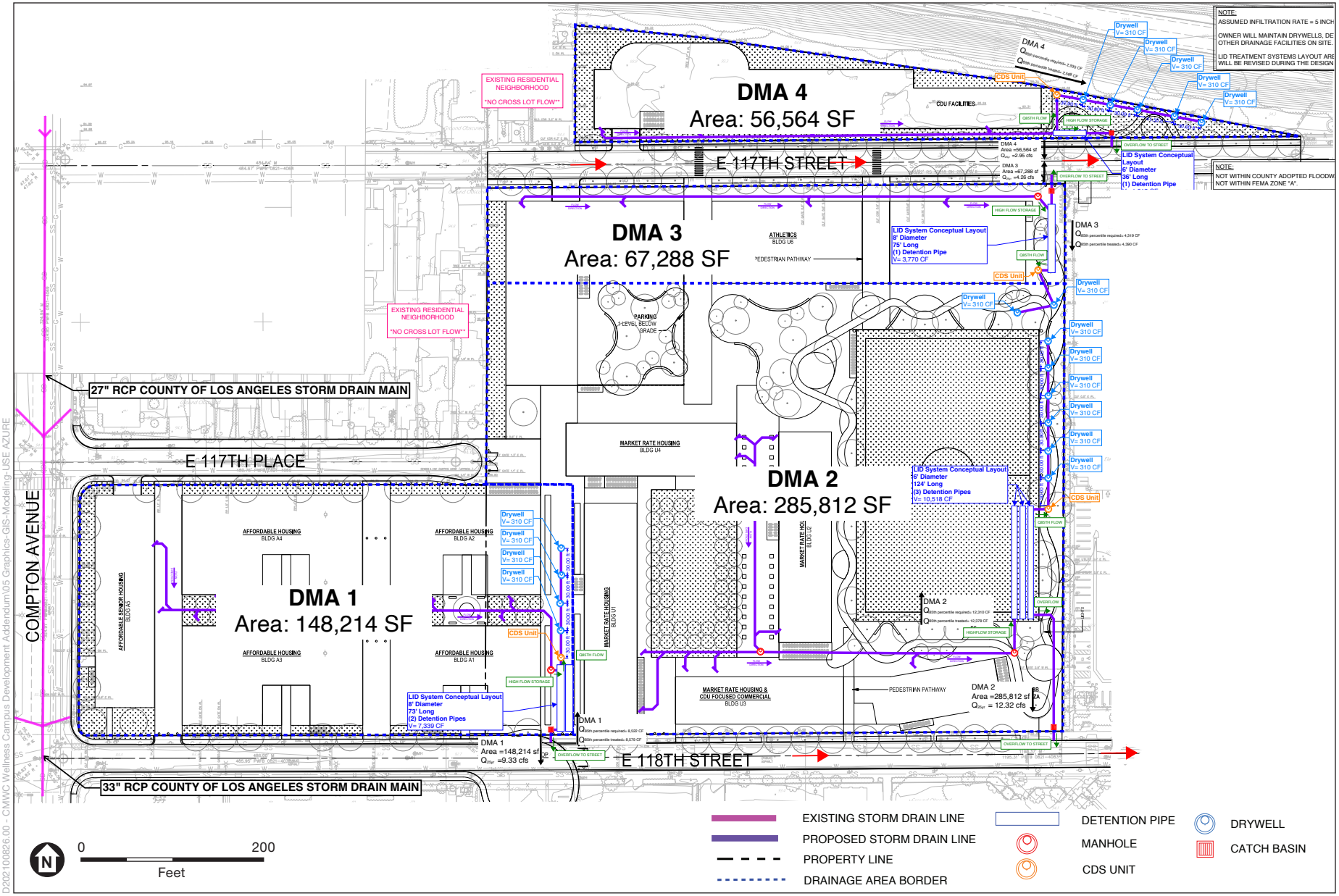
2.4.5 Utilities and Infrastructure Improvements

Storm Water Facilities

The Project site is divided into four drainage management areas (DMAs) that are served by existing drainage facilities. The Proposed Project will be served by the existing and proposed drainage facilities, as illustrated on **Figure 2-4,** *Existing and Proposed Drainage Facilities*. The existing facilities include a reinforced concrete pipe (RCP) storm drain main on Compton Avenue to the west. Existing catch basins are located along Compton Avenue and E. 118th Street, near the intersections of E. 118th Street and Compton Avenue. Additionally, there are minimal on-site catch basins and area basins located on the Project site, but these onsite basins will be removed and replaced with the proposed drainage facilities. Furthermore, the existing curbs and gutters along E. 117th Street, E. 117 Place, and E. 118th Street convey storm water to existing offsite catch basins.

As illustrated on Figure 2-4, the Proposed Project includes a system of drainage pipes, storage tanks (detention pipes), drywells and continuous deflective separation (CDS) units that screen, separate, and trap debris, sediment, and hydrocarbons from stormwater runoff.

Exhibit F



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SOURCE: Fredrick Fisher and Partners, 2024

CDU Wellness and Education Campus

Figure 2-4
Existing and Proposed Drainage Facilities

ESA

Water Facilities

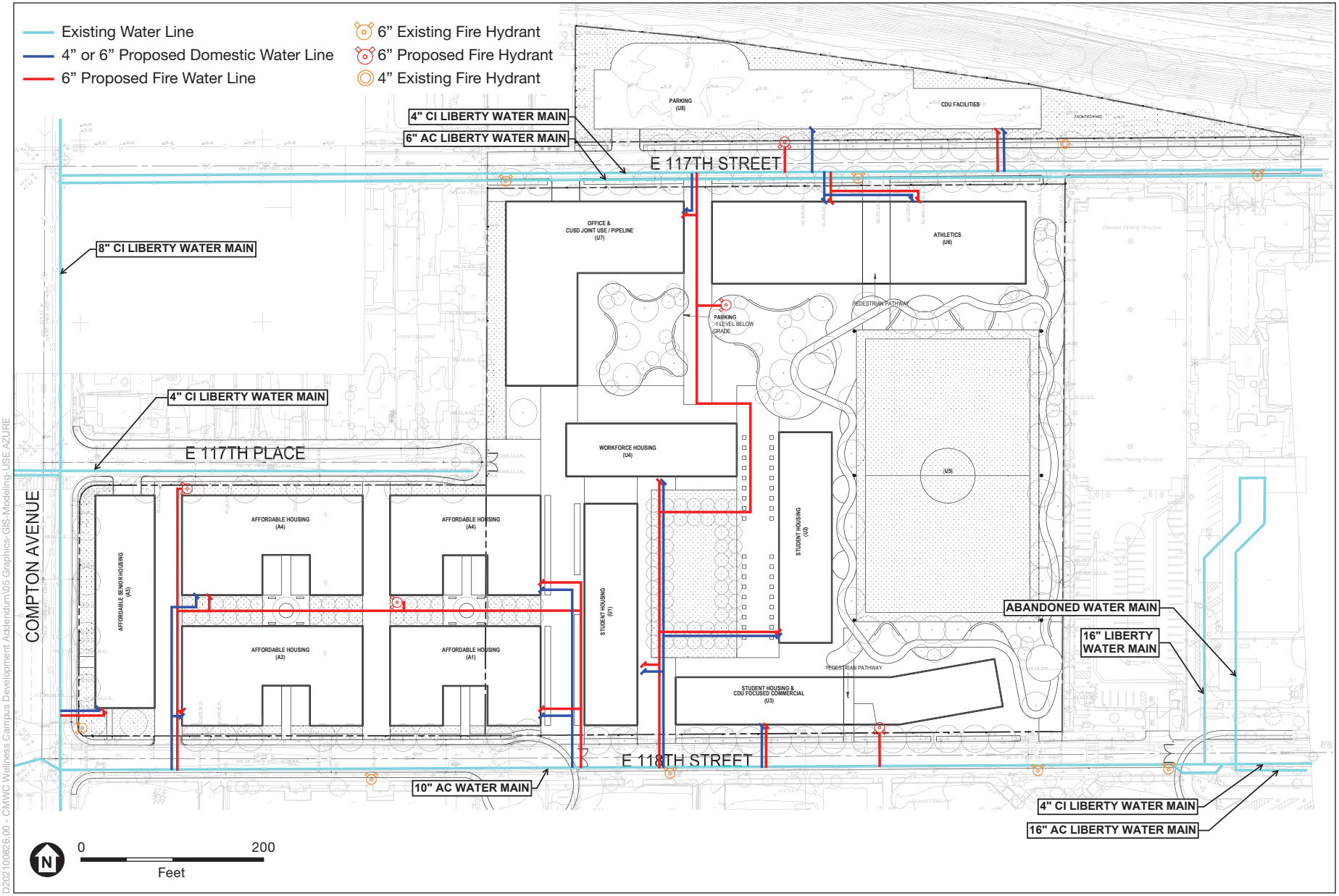
The Proposed Project will be served by existing and proposed water facilities as illustrated on **Figure 2-5,** *Existing and Proposed Water Facilities*. The existing facilities include water mains along E. 117th Street (4-inch diameter and 6-inch diameter), E. 117th Place (4-inch diameter), E. 118th Street (10-inch diameter), and Compton Avenue (8-inch diameter). In addition, there are existing fire hydrants located along E. 117th Street, E. 118th Street and Compton Avenue. The Proposed Project includes 4-inch-diameter and 6-inch-diameter water lines that will connect to the existing lines located along E. 117th Street, E. 118th Street, and Compton Avenue. The proposed water lines will connect to each of the proposed structures. In addition to the water lines that will supply domestic water, the Proposed Project includes a system of additional fire hydrants and 6-inch-diameter fire water lines that will connect to each of the proposed structures and provide adequate fire flow to serve the Proposed Project.

To ensure that there is sufficient water supplies available to serve the Proposed Project, a water supply assessment (WSA) was prepared for the Proposed Project in accordance with Senate Bill 610 and Senate Bill 221 (see Appendix J of this Addendum to Final PEIR). The WSA evaluated whether the Liberty Utilities – Park Water (Liberty), water purveyor for the Project site, water system's total water supplies during normal, single dry, and multiple-dry water years during a 20-year projection will meet the projected water demand associated with the Proposed Project, in addition to the Liberty public water system's existing and planned future uses. The WSA determined that Liberty's projected water supplies will be sufficient to satisfy the demands of the Proposed Project, in addition to existing and planned future uses.

Wastewater Facilities

The Proposed Project will be served by existing and proposed wastewater facilities as illustrated on **Figure 2-6,** *Existing and Proposed Wastewater Facilities*. The existing facilities include a 27-inch trunk sewer main along Compton Avenue that conveys stormwater from north to south. There are two sewer lines along E. 118th Street. The first sewer line is an existing 30-inch trunk sewer main and the second is an 8-inch sewer main. Both sewer facilities convey wastewater from west to east. Along E. 117th Street and E. 117th Place, there are existing 8-inch sewer mains. The existing sewer main on E. 117th Street conveys wastewater from west to east. The existing sewer main along E. 117th Place conveys wastewater from east to west. The Proposed Project includes 6-inch-diameter sewer lines that will connect each of the proposed structures to either the existing sewer lines along E. 117th Place (8-inch diameter) or E. 118th Street (8-inch diameter). The storage/office use within the proposed parking structure will be the only use connecting to the existing sewer line along E. 117th Street (8-inch diameter). The proposed wastewater facilities are not proposed to tie directly into the 30-inch-diameter sewer trunk line along E. 118th Street or the 27-inch-diameter sewer trunk line along Compton Avenue.

Exhibit F



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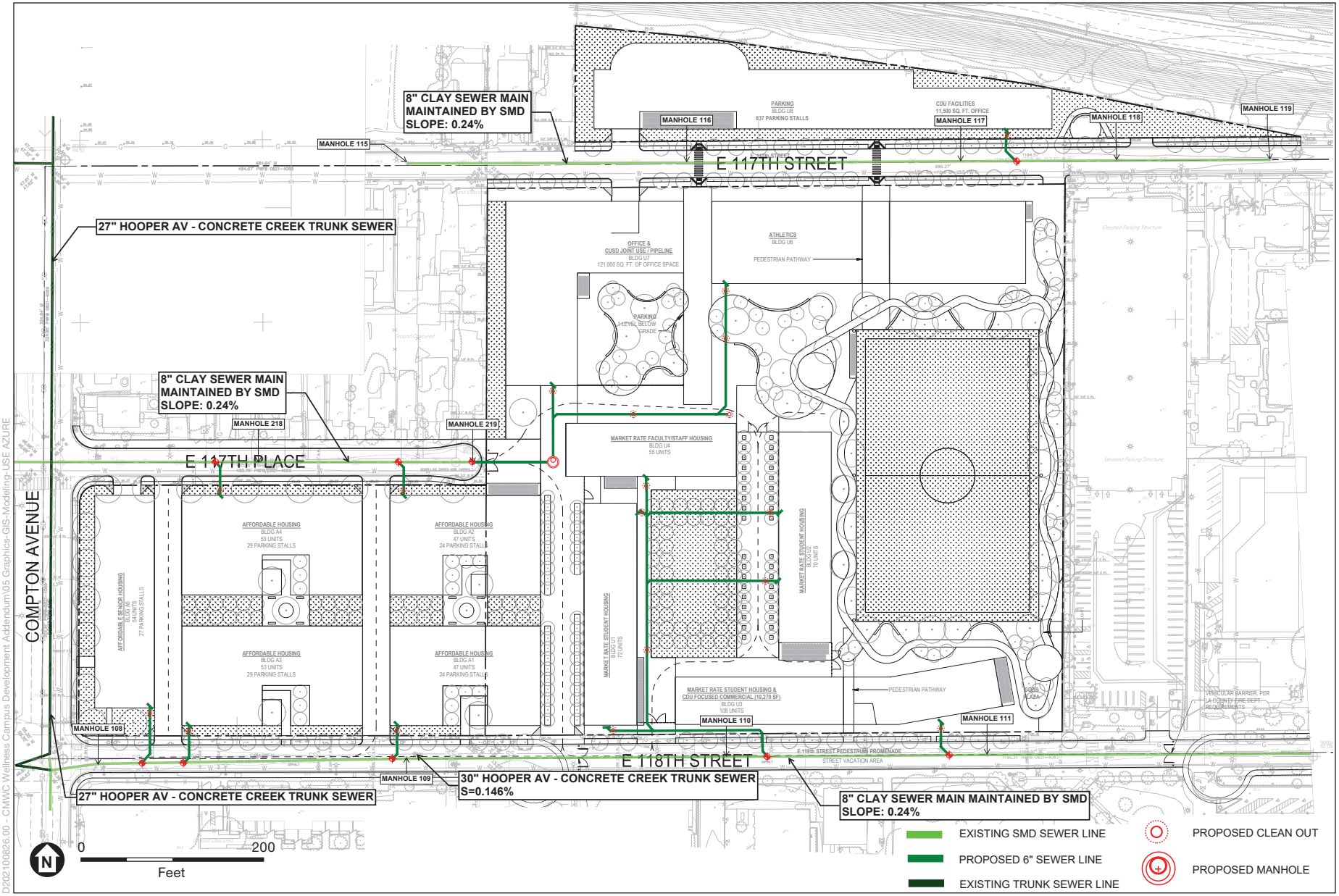
SOURCE: Fredrick Fisher and Partners, 2023

CDU Wellness and Education Campus

Figure 2-5
Existing and Proposed Water Facilities

ESA

Exhibit F



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SOURCE: Fredrick Fisher and Partners, 2024

CDU Wellness and Education Campus

Figure 2-6
Existing and Proposed Wastewater Facilities

ESA

Electrical Utility Facilities

The Proposed Project will be served by existing and proposed electrical utility facilities. The existing Southern California Edison (SCE) medium voltage electrical distribution system that will serve the Proposed Project is composed of power poles and overhead power lines located along the public roadways (Compton Avenue, E. 118th Street, E. 117th Place, and E. 117th Street) adjacent to the Project site. The proposed electrical lines will connect to the existing lines in various locations along the adjacent roadways. The specific electrical service loads proposed for each building is estimated as follows:

- Affordable Housing Buildings A1 and A2; Electric Service Size: 2,000 amps at 208Y/120 Volts, 3Ø, 4 wire each
- Affordable Housing Buildings A3, A4 and A5: Electric Service Size: 2,500 amps at 208Y/120 Volts, 3Ø, 4 wire each
- Student Housing Buildings U1, U2 and U3 and Faculty/Staff Housing Building U4: Electric Service Size: 2,000 amps at 208Y/120 Volts, 3Ø, 4 wire each
- Office Building U7: Electric Service Size: 4,000 amps at 480Y/277 Volts, 3Ø, 4 wire
- Athletics Building U6: 1600 amps at 480Y/277 Volts, 3Ø, 4 wire
- Parking Structure U8: Electric Service Size: 3,000 amps at 480Y/277 Volts, 3Ø, 4 wire

The total proposed anticipated load is 21,500 amps at 280V and 8,600 amps at 480 volts. These proposed loads will be reduced with the use of photovoltaic panels on all building roofs, along with battery storage capability. Currently, photovoltaic panels are planned to be installed over the residential buildings, parking structure roof deck and on 50% of the athletic building roof (the other 50% will house the solar hot water heating system for the pool). Photovoltaic infrastructure will be provided for all other buildings.

SCE will provide a dedicated transformer for each building. Per SCE Distribution Design Standards, a clear passageway of 12 feet minimum will be available at all times, immediately adjacent to one side of the transformer to provide an accessible roadway for transformer maintenance. This passageway will be designed to meet H-20 (20-ton) Construction. At each building, the anticipated location of the utility transformers will be at the back of the sidewalks in the landscape areas adjacent to the nearest public roadway and concealed from public view.

Data and Communication Systems Infrastructure

The Proposed Project will be served by existing and proposed data and communication systems infrastructure. The existing Spectrum data and communication system that will serve the Proposed Project uses is composed of utility poles and overhead cable systems with very limited underground systems located along the public roadways (Compton Avenue, E. 118th Street., E. 117th Place., and E. 117th Street.) adjacent to the Project site.

Communication connectivity between the existing CDU campus and the Proposed Project site will be accomplished by constructing an underground conduit system from the main distribution

frame room located in the CDU Life Sciences Building, across E. 118th Street to the Project site and routed circular to the Proposed Project buildings back to the CDU campus Keck building.

Spectrum Communication will provide data and communication services to each building through underground conduits to the nearest utility access point. It is anticipated that the utility access points to Spectrum's infrastructure will be at the nearest utility pole or relocated underground infrastructure on the public roadways adjacent to each building. In addition to the underground conduits connecting each building to Spectrum's infrastructure, the Proposed Project will include a loop system to connect the data/telecommunication room of each building to the neighboring building on each side.

2.4.6 Landscaping

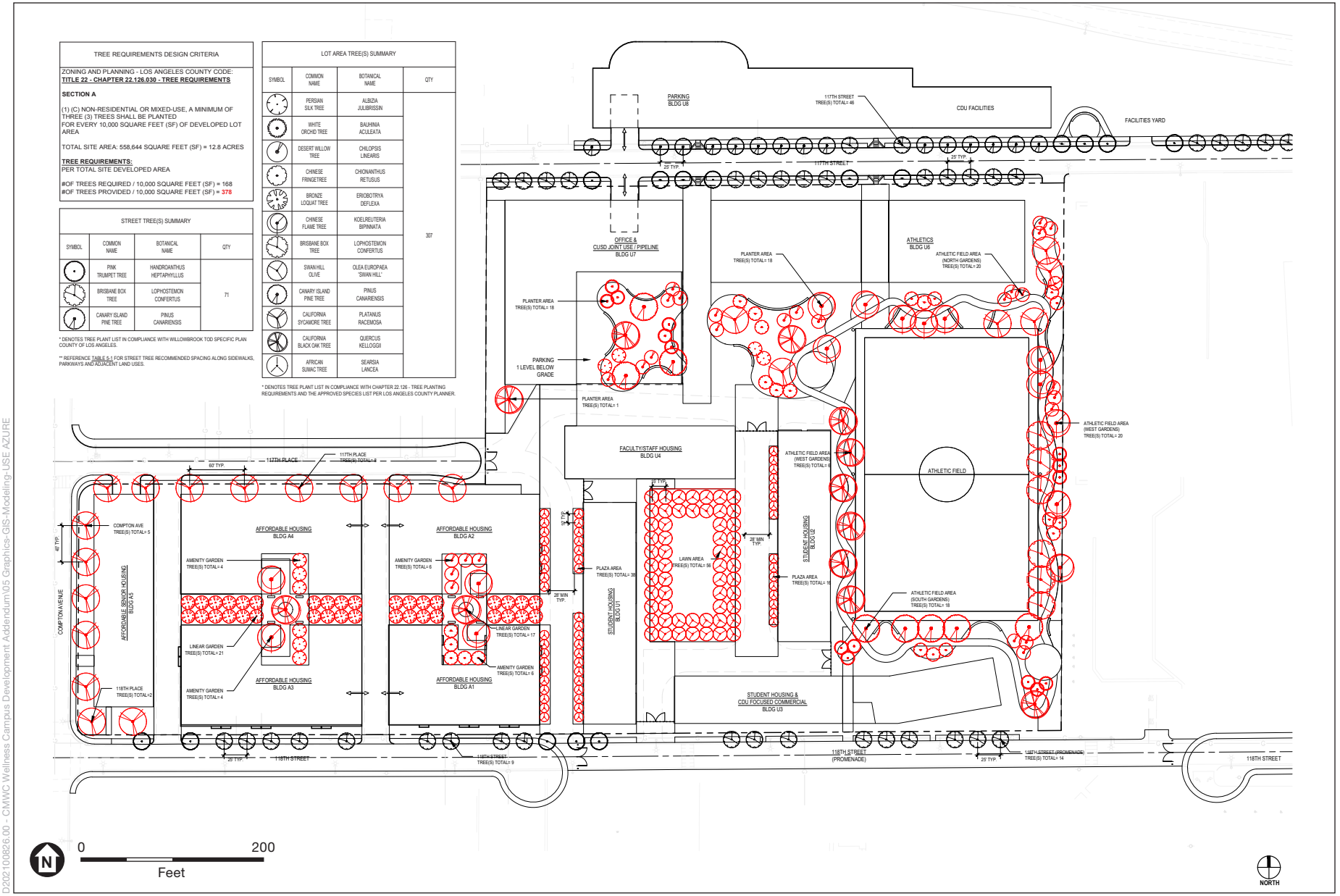
Landscaping throughout the Project site will emphasize the use of native species or species requiring limited irrigation while providing seasonal interest and a rich mix of colors and textures. Throughout the Project site, the planting approach will introduce a large variety of species to maximize biodiversity and create habitat for birds, butterflies and pollinators. Four main "character zones" will be employed throughout: gardens, lawns, building-associated plantings, and tree canopy. **Figure 2-7,** *Proposed Tree Plan,* illustrates the proposed tree plan for the site while **Figure 2-8,** *Proposed Landscape Plan,* illustrates the locations of the proposed shrubs and groundcover as well as natural grass.

Gardens will create discrete lush drought tolerant planting zones including a range of furnishings allowing users to gather and linger. Lawns are focused primarily in the "residential quad" between the proposed student and Faculty/Staff housing. Lawn areas are strategically located to minimize their use due to irrigation demands. Building-associated landscaping will be used to soften the base of buildings, as well as screen utility and parking areas. These plantings will focus on evergreen species and stay below eye-level to ensure clear sightlines. Tree canopy is employed to introduce much-needed shade and to bring a human scale to the Project site. The tree canopy overlays on top of the other three planting areas to create a layered planting approach. A new onsite tree canopy will also be aligned with the street tree canopies.

2.4.7 Construction Activities and Grading

The Proposed Project includes 13 individual development areas that will be constructed based on market conditions and could extend up to 30 years (i.e., 2025 to 2055) consistent with the proposed Development Agreement (DA). The individual development areas are illustrated in **Figure 2-9,** *Individual Development Areas*.

Exhibit F



SOURCE: Fredrick Fisher and Partners, 2023

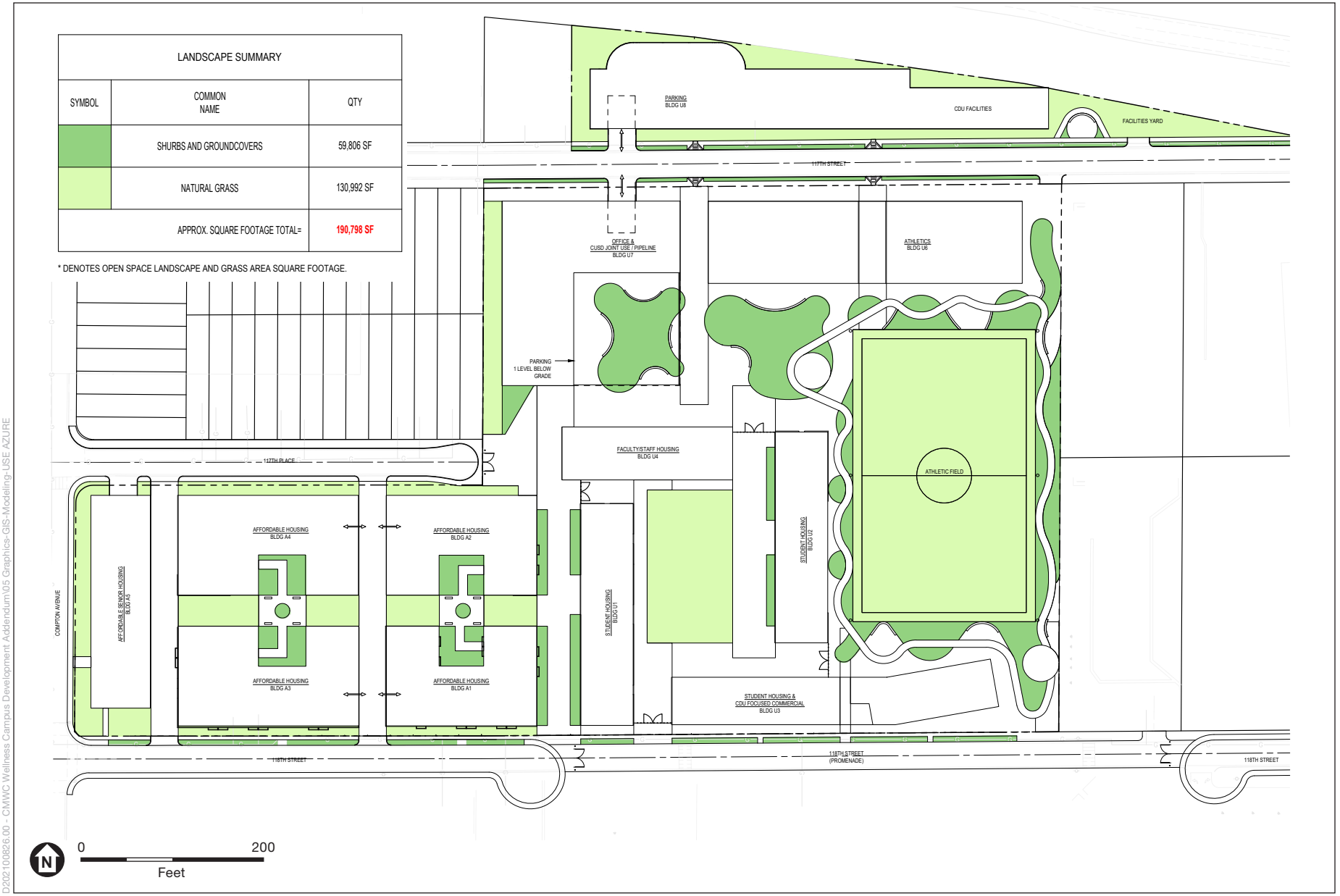
CDU Wellness and Education Campus

Figure 2-7
Proposed Tree Plan

D2021008826.00 - CMWC Wellness Campus Development Addendum\05 Graphics-GIS-Modeling-USE AZURE

ESA

Exhibit F



D2021008826.00 - CMWC Wellness Campus Development Addendum\05 Graphics-GIS-Modeling-USE AZURE

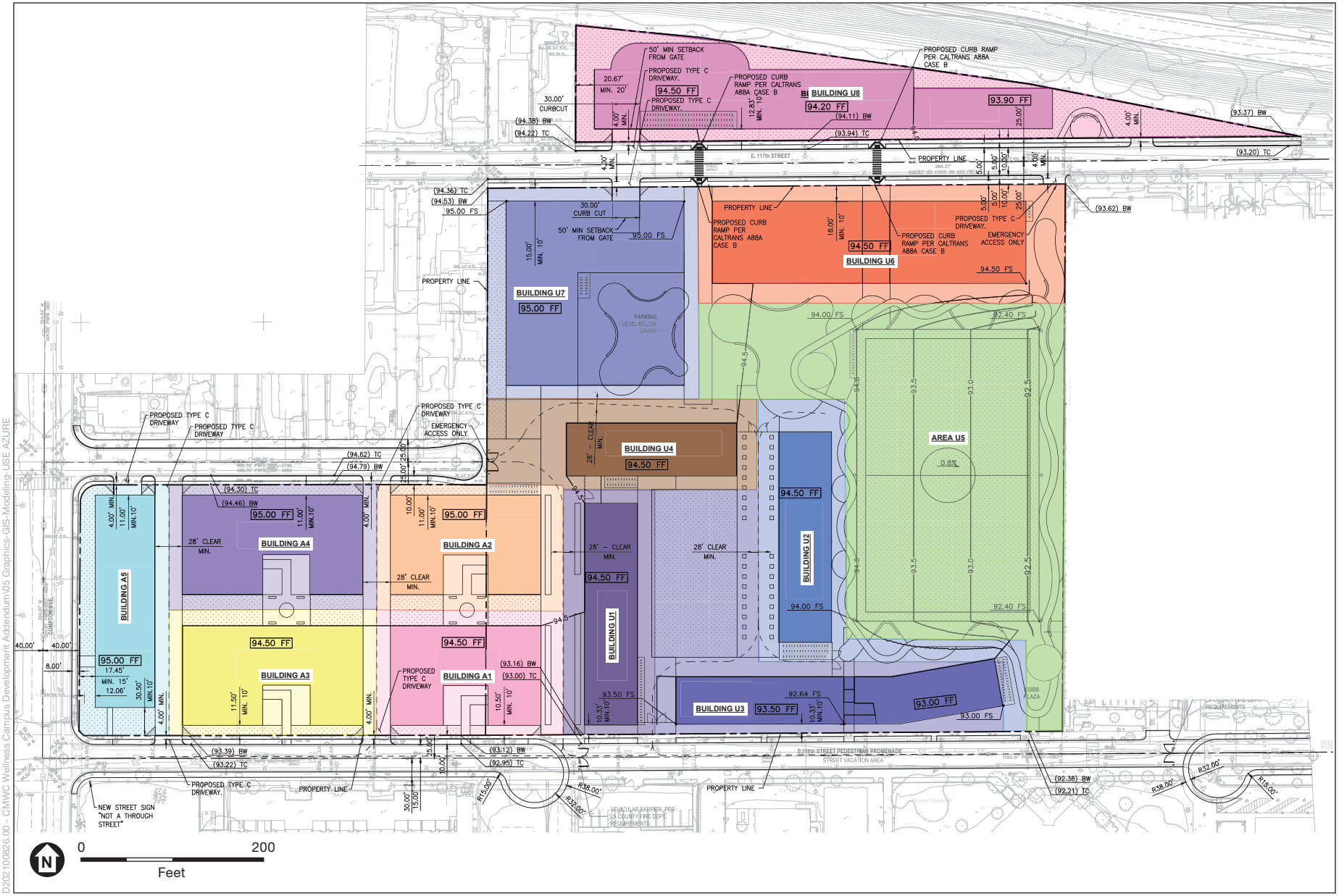
SOURCE: Fredrick Fisher and Partners, 2023

CDU Wellness and Education Campus

Figure 2-8
Proposed Landscape Plan

ESA

Exhibit F



D202100826.00 - CMWC Wellness Campus Development Addendum\05 Graphics-GIS-Modeling-USE AZURE

SOURCE: Fredrick Fisher and Partners, 2023

CDU Wellness and Education Campus

Figure 2-9
Individual Development Areas

ESA

The five proposed affordable housing buildings located on approximately 3.35 acres will be phased so that three of the affordable housing buildings will begin construction within seven years of the DA effective date (i.e., 2032) or sooner and the remaining two affordable housing buildings will begin construction within 12 years of the DA effective date (i.e.,2037) or sooner. The proposed phasing for the CDU Campus portion of the Project site will include the start of construction for up to 40 percent of the CDU Campus area (i.e., acreage) portion of the Project site within 10 years of the DA effective date (i.e., 2035) or sooner, start construction of up to 60 percent of the CDU Campus area within 20 years of the DA effective date (i.e., 2045) or sooner, and start construction for 100 percent of the CDU Campus area within the 30 year DA term (i.e., 2055) or sooner.

The anticipated construction of the Proposed Project includes no more than two individual development areas under construction at any one time and the two individual development areas under construction will not be adjacent or adjoining the same existing offsite residential area. The term "under construction" is intended to be defined as the period of time from any ground disturbance through the issuance of a temporary certificate of occupancy. The terms "adjacent" and "adjoining" are intended to be consistent with the definitions provided in the Los Angeles County Code Section 22.14.010. One of the initial construction activities involves demolition and hydroseeding to stabilize the onsite soils to prevent topsoil erosion. Demolition activities will involve the removal of the existing foundations, asphalt, and concrete (approximately 3,500 cubic yards) that were left after the school operations relocated and the school buildings removed. Hydroseeding is assumed to occur throughout the Project site except for the Athletic Building (U6) location because this area that encompasses approximately 1.2 acres is assumed to receive imported gravel (approximately 490 cubic yards) to accommodate short-term parking prior to the construction of the Parking Structure (U8).

Grading activities will occur for each individual development area. The total anticipated amount of grading for all development areas on the Project site is approximately 151,000 cubic yards, including approximately 71,000 cubic yards of soil to be exported and approximately 40,000 cubic yards of soil moved, but remain onsite.

All construction activities will be performed in accordance with all applicable state and federal laws and County codes and policies with respect to building construction and activities. Proposed Project construction activities will occur between 7:00 am and 7:00 pm. Monday through Saturday, and no construction will occur on Sundays or legal holidays. These proposed construction hours are in compliance with the Los Angeles County Code Section 12.08.440.

The Applicant will implement typical construction attenuation techniques incorporating noise barriers (and additional sound blankets for certain areas) to reduce construction noise levels associated with mobile and stationary equipment at the various noise-sensitive receptors. Because less attenuation is required for the mobile construction equipment compared to the stationary construction equipment and the mobile equipment is typically required for the initial activities associated with construction, less attenuation could be provided until the stationary equipment is required on the construction site. The Applicant's construction attenuation techniques of the

Proposed Project are discussed below and the locations are illustrated in **Figure 2-10**, *Proposed Project Mobile and Stationary Construction Equipment Attenuation Technique Locations*.

Construction Techniques (CT):

Receptor Location R1:

- **CT-1** – The Applicant will install an approximately 130-foot-long, 15-foot high solid barrier extending from the I-105 right-of-way/Project site boundary to the north side of the E. 117th Street northern sidewalk. During the operation of mobile construction equipment, the solid barrier will reduce noise levels by 4 dBA. During the operation of stationary construction equipment, the solid barrier will also include sound attenuation blankets to reduce noise levels by 15 dBA.
- **CT-2** – During the operation of mobile construction equipment, no attenuation is required. During the operation of stationary construction equipment, the Applicant will install an approximately 150 foot-long 15-foot high solid barrier extending from residential property/Project site property line on the south side of E. 117th Street to the east along the south side of E. 117th Street to reduce noise levels by 7 dBA.

Receptor Location R2:

- **CT-3** – During the operation of mobile construction equipment, no attenuation is required. During the operation of stationary construction equipment, the Applicant will install of an approximately 150-foot-long, 15-foot high solid barrier extending along the north side of E. 117th Street starting across from the eastern side of the existing parking structure and extending to the west to reduce noise levels by 4 dBA.

Receptor Location R3:

- **CT-4** – The Applicant will install an approximately 650 foot-long 15-foot high solid barrier extending along the north side of E. 118th Street from the northeast corner of E.118th Street/Compton Avenue to the east to reduce mobile and stationary construction equipment noise levels by at least 7 dBA.

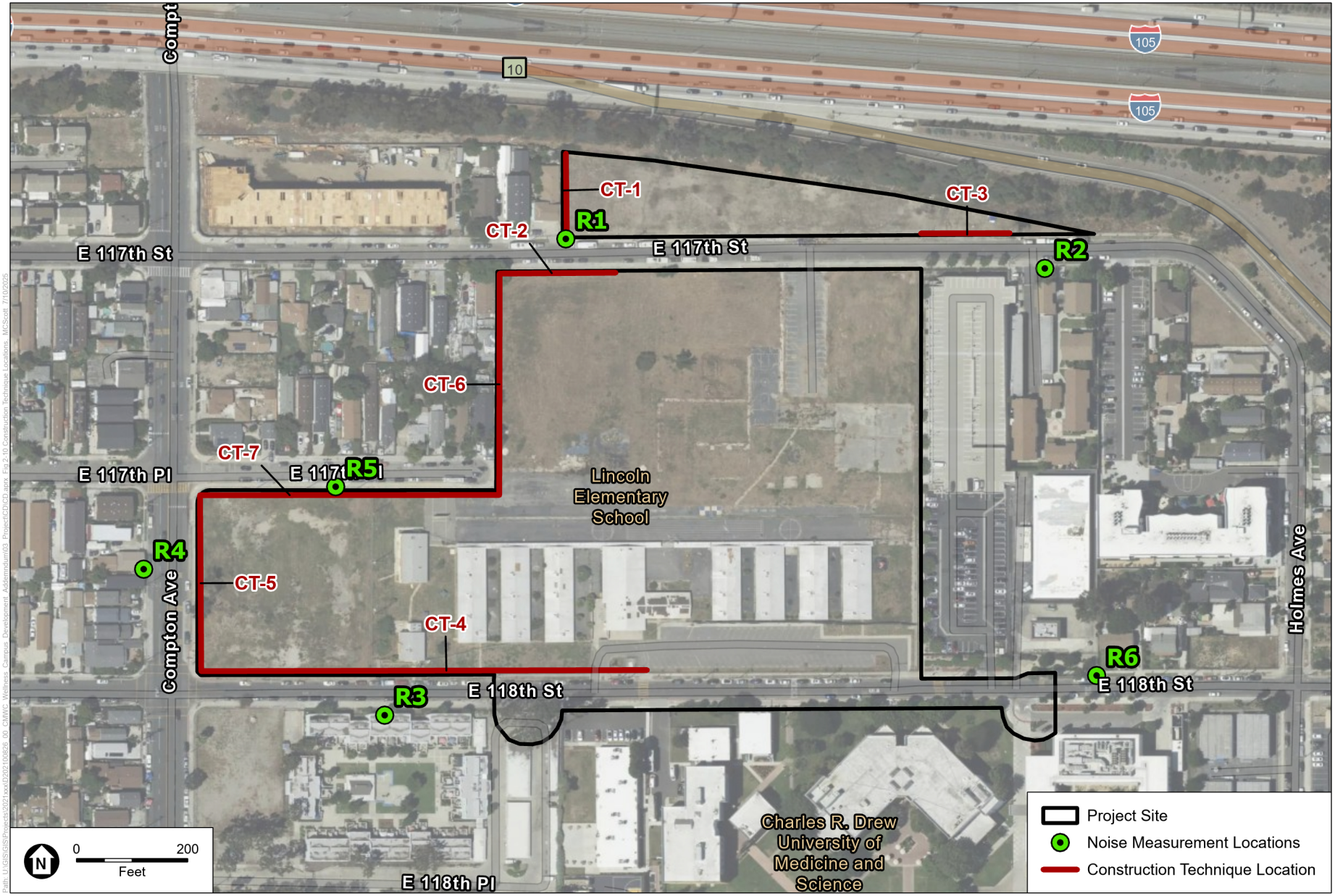
Receptor Location R4:

- **CT-5** - During the operation of mobile construction equipment, no attenuation is required. During the operation of stationary construction equipment, the Applicant will install an approximately 275 foot-long, 15-foot high solid barrier extending from the northeast corner of E.118th Street/Compton Avenue to the southeast corner of E. 117th Place/Compton Avenue to reduce noise levels by 7 dBA.

Receptor Location R5:

- **CT-6** – The Applicant will install an approximately 275 foot-long, 15-foot high solid barrier with sound attenuation blankets extending from E. 117th Street to E. 117th Place along current western project boundary. During the operation of mobile construction equipment, the solid barrier will reduce noise levels by 5 dBA. During the operation of stationary construction equipment, the solid barrier will also include sound attenuation blankets to reduce noise levels by 13 dBA.

Exhibit F



SOURCE: ESA, 2025

CDU Wellness and Education Campus

Figure 2-10
Proposed Project Mobile and Stationary
Construction Equipment Attenuation Technique Locations

ESA

- **CT-7** – The Applicant will install an approximately 450 foot-long, 15-foot high solid barrier extending along the south side of E. 117th Place from the southeast corner of E. 117th Place/Compton Avenue to the end of the existing E. 117th Place cul-de-sac. During the operation of mobile construction equipment, the solid barrier will reduce noise levels by 4 dBA. During the operation of stationary construction equipment, the solid barrier will also include sound attenuation blankets to reduce noise levels by 13 dBA.

Receptor Location R6:

- During the operation of mobile and stationary construction equipment, no attenuation is required.

2.4.8 Sustainable Features

The sustainability features that will be included in the design for the Proposed Project are identified below.

- As a best management practice and sustainable feature of the Proposed Project, the construction contractors for each individual development area will use construction equipment that have engines of 25 horsepower (hp) or greater that complies with USEPA Tier 4 Final non-road engine standards and use electric welders during building construction.
- CALGreen Building Code & Title 24 Energy Code Compliance (2022 or current version at time of building permit issuance): As such, compliance with the 2022 or current version of CALGreen and 2022 or current version of Title 24 energy efficiency standards at the time of building permit issuance will be required. The CALGreen code sets the minimum green building code requirements for planning, energy efficiency, water efficiency, materials & resource efficiency, and environmental quality. The Title 24 Energy Code sets the minimum efficiency standards for building envelope, glazing, roofing, heating/ventilation/air conditioning (HVAC), lighting, water heating, renewable energy, and battery storage.
- Electric Vehicle (EV) Charging: The Proposed Project will provide EV installed and capable parking spaces (conduit installed) for both residential and non-residential spaces in accordance with the current versions of the CALGreen Code and the Los Angeles County Code at the time of building permit issuance.
- Solar Photovoltaics & Battery Storage: The Proposed Project will include solar photovoltaic (PV) as required by the Title 24 Energy Code at the time of building permit issuance, for all new residential buildings. The Energy Code minimum required PV system equates to an estimate of a 70% electricity offset for residential projects. Infrastructure for PV will be provided for all remaining buildings within the Project site. The Proposed Project will also include on-site battery storage, as required per Title 24 Code a the time of building permit issuance, to provide capabilities for peak-load demand management and resiliency for emergency use purposes.
- Air Filtration & Monitoring: The Proposed Project design will include HVAC systems that are equipped with Minimum Efficiency Report Value (MERV) filters to reduce the particulate matter that can enter the buildings. The rating of the MERV filters will be in compliance with the current version of Title 24 and the Los Angeles County Code at the time of building permit issuance.

- Healthy Materials & Finishes: The Proposed Project design will include the specifications of paints, adhesives, and sealants that meet the California Air Resources Board (CARB) and South Coast Air Quality Management District (SCAQMD) thresholds for maximum levels of Volatile Organic Compounds (VOCs) and formaldehyde.
- Alternative Transportation Choices: The Project site is ideally located to encourage alternate transportation choices, with two Metro rail transit lines within two blocks. The Proposed Project design will include locations for bicycle parking in accordance with the version of the Los Angeles County Code at the time of building permit issuance. The partial vacation of E. 118th Street will encourage walking and biking to and from the adjacent Metro station.
- Sustainable Building Design and Materials for CDU Buildings. The CDU buildings of the Proposed Project will be designed and include materials that are environmentally sustainable. The building and design elements include daylighting and acoustic performance, low-emitting materials, locally sourced products and materials, rainwater management and other sustainable design features. These building and design elements will be equivalent to the requirements of the Leadership in Energy & Environmental Design (LEED) certified-level.
- Sustainable Building Design and Materials for Affordable Residential Buildings. The affordable residential portions of the Proposed Project will be designed and include materials that are environmentally sustainable. The building and design elements will include categories of sites, water, energy, materials, and indoor environment that follow sustainable design best practices for the design, engineering, construction, and operations aspects of the affordable residential buildings. These building and design elements will be equivalent to the requirements of the LEED-Homes or GreenPoint Rated New Home Multifamily rating systems.

2.5 Proposed Project Development Comparison to Development Evaluated in Specific Plan Final Program EIR

As discussed above in Section 2.4.1, the Specific Plan Final PEIR evaluated development (residential units and non-residential square footage) throughout the Specific Plan area including the Project site. As shown in **Table 2-3,** *Proposed Project Development Comparison to Development Evaluated in Specific Plan Final Program EIR*, the Proposed Project includes fewer residential units (33) and less non-residential square footage (41,017) compared to the development evaluated for the Project site within the Specific Plan Final PEIR.

2.6 Reviews and Approvals

This Addendum to Final PEIR is intended to be used by the lead and responsible agencies that may have review authority over the Proposed Project. It is intended to inform the agencies and the public of the environmental effects of the Proposed Project in comparison to the effects identified in the Final PEIR.

TABLE 2-3
PROPOSED PROJECT DEVELOPMENT COMPARISON TO DEVELOPMENT EVALUATED IN SPECIFIC PLAN FINAL PROGRAM EIR

Specific Plan Group Location # and Land Use	Development Evaluated in Specific Plan Final PEIR[a]	Proposed Project Development	Proposed Project Increase/Decrease Compared to Development Evaluated in Specific Plan Final Program EIR
Group Locations 3E and 3F			
Residential (DU)	592	559	-33
Non-Residential (SF)	473,927	432,910	-41,017

NOTES:
DU – Dwelling Unit
SF – Square Feet
a. See Table 2-1. The total development within Groups 3E and 3F does not include the existing 106 residential units that encompass the entire area of Group 3F located outside the Project site.
SOURCE: ESA, 2024

2.6.1 County of Los Angeles

The following approvals from the County of Los Angeles are required for the Proposed Project.

1. Approval of Amendments to the Willowbrook Transit-Oriented District Specific Plan and Zone Text Amendment to the Los Angeles County Code.
   - Amend Los Angeles County Code Sections Table 22.412.040-B, Table 22.412.040F and other sections of Chapter 22.412.
   - Modify the height limit in the MU-2 zone by allowing up to 70 feet for the proposed market-rate Faculty/Staff housing building with no story limitation, three market-rate student housing buildings, and the office building. The height limit within the current Specific Plan is four stories and 50 feet.
   - Modify the height limit within the MU-2 zone to allow the proposed parking structure and total height of 110 feet with no story limitation, excluding any rooftop mechanical equipment.
   - The Specific Plan/County Code will also be amended to allow university housing to provide additional common open space in lieu of private open space.
   - Eliminate the minimum residential unit sizes in the MU-2 zone consistent with the Proposed Project.
2. Ministerial Site Plan Review Approval to permit the construction of five affordable/senior multifamily housing buildings.
3. Administrative Housing Permit Approval to establish and monitor all 254 units as affordable for low-income households. The Administrative Housing Permit also requests a Density Bonus Incentive to provide a zero-foot step-back on a 4-story building (Bldg. A5) with frontage on Compton Avenue in lieu of a 10-foot step-back on the 4th floor.
4. Conditional Use Permit Approval to allow the proposed CDU facilities and related one faculty/staff housing building, three market rate student housing buildings with ground floor retail, one 116,000 sf office building, one athletic facilities building, one athletic

field, one 110-foot high parking structure, and uses that include storage and accessory facilities within the MU-2 zone of the Willowbrook Transit-Oriented Development Specific Plan. The Proposed Project will also include uses and large group events typically ancillary to a university, such as graduation ceremonies, concerts, community uses, and similar events within indoor and outdoor facilities. The outdoor events will also include events with small groups such as farmers market, book fair, health fair, and other similar community events. The outdoor events could include amplifiers to appropriately increase noise levels depending on the event. Higher noise levels such as 95 decibels at 5 feet for large group gatherings compared to lower noise levels such as 80 decibels at 5 feet for small group gatherings. Because the Proposed Project includes a total earthwork volume of 151,000 cubic yards, an approval of a conditional use permit is required because the Proposed Project's grading is in excess of 100,000 cubic yards.

5. Development Agreement Approval between the Applicant and the County of Los Angeles in accordance with the Development Agreement Act.
6. Long-Term Ground Lease Approvals by CUSD that include (1) a lease from the County to CUSD of the parking garage site and sublease of the site to CDU and (2) a ground lease from CUSD to CADI or the Affordable Member Partnerships.
7. Street Vacation Approval to terminate the public road right-of-way for approximately 700 feet of E. 118th Street along a portion of the southern boundary of the Project site (with a varied width of 50–55 feet). The goal is to create a cohesive university campus with a pedestrian plaza between the existing CDU campus and the Project site. Vehicular cul-de-sacs will be added to both ends of the street vacation area to protect the new pedestrian plaza. A recommendation to approve the vacation from the County Department of Public Works is required, with final approval required by the Board of Supervisors.

2.6.2 Responsible, Trustee, and Other Agencies

California Department of Transportation – Approval of an Encroachment Permit if construction of the proposed parking structure north of E. 117th Street requires an encroachment into the existing I-105 right-of-way.

State Water Resources Control Board – Approval of General Construction Activity Stormwater Permits

Los Angeles Regional Water Quality Control Board – Approval of National Pollutant Discharge Elimination System (NPDES) Permits

South Coast Air Quality Management District – Approval of Point Source-Emissions Permits

Los Angeles County Sanitation District – Approval of an Industrial Wastewater Permit to discharge industrial wastewater to the County's sewage collection and treatment system. Some uses within the proposed buildings may require this permit, including any commercial restaurant.

Other Agencies – Additional approvals that are not known at this time may be required by other agencies where this Addendum to Final PEIR could be reviewed to determine if potential effects are adequately addressed.

Exhibit F

CHAPTER 3
Environmental Setting, Impacts, and Mitigation Measures

3.0 Introduction to the Analysis

This Addendum to the Final PEIR for the Specific Plan has been prepared in accordance with CEQA, the CEQA Guidelines and the applicable rules and regulations of the County of Los Angeles. This Addendum to the Final PEIR evaluates the potential environmental impacts associated with the implementation of the Proposed Project.

This Addendum is intended to serve as an informational document for the public agency decision-makers and the public regarding the Proposed Project.

3.0.1 Overview of Environmental Setting

This section provides a general overview of the environmental setting for the Project site. More detailed descriptions of the environmental setting are provided for each environmental issue within their respective sections found in Sections 3.1 through 3.20.

Project Site and Vicinity Setting

The Project site is comprised of two parts. The area south of E. 117 Street is owned by the Compton Unified School District (CUSD) and the area north of E. 117th Street is owned by the Los Angeles County Development Authority (LACDA). **Figure 3-1,** *Existing and Surrounding Land Uses,* illustrates the existing onsite and surrounding land uses.

The CUSD property encompasses approximately 11.5 acres and includes two abandoned school sites, formerly known as Lincoln Elementary School, that included school buildings on the southern portion of the CUSD property and the Barack Obama Charter School that included school buildings in the northeast portion of the CUSD property. In 2017, the operations of the Lincoln Elementary School and the Barack Obama Charter School were relocated to the City of Compton and City of Los Angeles, respectively. In 2020, the school structures associated with the Barack Obama Charter School were removed while in 2023, the school structures associated with the Lincoln Elementary School were removed. The school structures were removed because the structures were being used as homeless encampments and subject to vandalism and stripping of building components. These activities resulted in reoccurring safety issues since the relocation of the school operations in 2017.

Exhibit F



SOURCE: NearMap, 2024; ESA, 2024

CDU Wellness and Education Campus

Figure 3-1
Existing and Surrounding Land Uses

ESA

Currently, the CUSD portion of the Project site includes building foundations, surface parking lots, and asphalt school play yard, but no vertical structures are located on the site. The site includes non-native grasses that are periodically maintained during vegetation fuel modification activities. The CUSD property includes two ash trees located on the west side of the Project site adjacent to Compton Avenue and one Mexican fan palm tree located north of E. 118th Street. In 2020, the portion of the CUSD property adjacent to Compton Avenue was used as temporary surface parking during construction of the County's new Child and Family Wellbeing Center on East 120th Street. Currently, the Project site does not include any active uses.

The LACDA property located north of East 117th Street encompasses approximately 1.3 acres. The property is vacant, contains disturbed vegetation with nominal ruderal non-native grasses due to periodic maintenance, and one small Peruvian Pepper tree along the current property line with the I-105 right-of-way. It has been vacant since the construction of I-105 in 1990s.

The existing land uses surrounding the Project site include the Willowbrook Green Apartments and CDU facilities south of E. 118th Street. To the southeast, there are additional CDU facilities, surface parking, residential, and Los Angeles County Fire Station 41 located off of E. 120th Street. To the east, there is a CDU surface parking lot and a three-level CDU parking structure. Beyond the parking areas, there are residential uses. To the north, there is the I-105 that includes an embankment with large eucalyptus trees within the I-105 right-of-way and separated from the Project site by an existing chain-linked fence. To the west, there are residential uses located north of E. 117th Street as well as between E. 117th Street and E. 117th Place. There are additional residential uses located on the west side of Compton Avenue.

Cumulative Projects Setting

Cumulative projects include recently completed projects, projects currently under construction, and future projects currently in development in the general vicinity of the Project site. As shown in **Table 3.0-1,** *Cumulative Project List*, below, these cumulative projects are primarily residential. There is one non-residential cumulative project that is an education building associated with the CDU Campus.

Exhibit F

TABLE 3.0-1
CUMULATIVE PROJECT LIST

No.	Project Name	Address	Description	Size	Units
County of Los Angeles					
1.	Residential Project	2454 E. 115th Place	Construction of a new duplex and 4 car garage.	N/A	2 units
2.	Residential Project	2436 E. 115th Place	Construction of a new duplex and 3 car garage.	N/A	2 units
3.	Residential Project	1601 E. 117th Street / 11668 Compton Avenue	Construction of a 100-unit 4-story multi-family rental building. Six (6) units will be restricted for Very Low Income (VLI) Households.	N/A	100 units
4.	Residential Project	1633 E. 117th Place	Demolition of existing single-family residential (SFR) and construction of a 4-story residential apartment building with 14 units, which include 4 VLI units.	N/A	14 units
5.	Residential Project	2032 E. 119th Street	Construction of 9 SFR units and 2 attached dwelling units (ADUs), replacing existing 1 SFR.	N/A	11 units
6.	Residential Project	2223 E. 119th Street	Construction of 3 SFR dwelling units and one duplex.	N/A	5 units
7.	Charles R. Drew University New Health Professions Education Building (2)	1731 E. 120th Street	Demolition of existing two modular buildings (9,628 square feet [sf]), and construction of a 4-story, 62,000 sf Health Professionals Building.	62,000 sf	N/A
8.	Residential Project	11649 Antwerp Avenue	Construction of a 3-story SFR and a new 3-story duplex.	N/A	3 units
9.	Residential Project	11653 Antwerp Avenue	Construction of a 3-story duplex (front), 3-story duplex (middle), and 2-story two ADUs (rear).	N/A	6 units
10.	Residential Project	12600/12630 S. Compton Avenue	The addition of 6 affordable units (3 duplexes) and new community center building to an existing 40-unit apartment complex.	N/A	6 units
11.	Residential Project	11909 S. Willowbrook Avenue	Construction of a one-story 7-unit affordable multi-family building.	N/A	7 units
12.	Residential Project	12503 S. Willowbrook Avenue	Construction of 4 multi-family dwelling units.	N/A	4 units
City of Los Angeles					
13.	Residential Project	11840 S. Central Avenue	Construction of 70 affordable dwelling units, replacing two duplexes.	N/A	70 units

SOURCE: RAJU Associates, Inc., 2023

3.0.2 Scope of the Environmental Impact Analysis

In accordance with Section 15126 of the CEQA Guidelines, this chapter provides an analysis of the direct and indirect environmental effects associated with the Proposed Project. These impacts are evaluated with respect to current conditions and compared to the impacts identified in the Final PEIR for the Approved Specific Plan. The determination of whether an impact of the Proposed Project is significant is based on the significance thresholds and methodology identified for each environmental issue. In accordance with the County of Los Angeles CEQA Initial Study Checklist, this chapter assesses the Proposed Project's potential effects on the environmental resources identified below.

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazard and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation and Traffic
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

3.0.3 Approach to Environmental Analysis

Sections 3.1 through 3.20 of this Addendum to Final PEIR include an update of the environmental setting on and in the vicinity of the Project site and identifies any applicable changes to the environmental conditions that may have occurred since the certification of the Final PEIR. In addition, a brief summary of the regulatory setting included in the Final PEIR and any substantive revisions to the regulatory setting that has occurred since the certification of the

Final PEIR. These sections also include the thresholds of significance and a brief summary of the environmental impacts and mitigation measures addressed in the Final PEIR as well as the potential environmental impacts associated with the Proposed Project. Each section addresses the project-level and cumulative impacts and mitigation measures for both the Approved Specific Plan and the Proposed Project.

On June 20, 2024, the Specific Plan was revised by the County of Los Angeles. Specific regulations within the Specific Plan were revised as well as other revisions that resulted in a zone change. According to the Los Angeles County Code Section 22.246.020.A.1, when there is a complete application prior to the effective date of a zone change, the applicant decides whether to be subject to the "zoning and regulations" applicable prior to the change. The development application for the Proposed Project was deemed complete by the County of Los Angeles on August 3, 2023. Therefore, for the Proposed Project, the Applicant has decided to be subject to the zoning and regulations applicable prior to the zone change which means that the zoning and regulations identified in the 2018 Approved Specific Plan are applicable to the Proposed Project.

Because the Proposed Project includes 13 individual development areas, and these areas would be constructed based on market conditions, a reasonable worst-case construction schedule for the individual development areas have been considered for analysis of construction and operational impacts. **Table 3.0-2,** *Reasonable Worst-Case Project Construction Schedule*, includes a worst-case construction schedule because full build-out of the Proposed Project is assumed to occur within approximately 11 years even though the proposed Development Agreement could extend Project development up to 30 years. An acceleration of construction activities on the Project site would represent greater environmental impacts compared to extending construction over a greater number of years.

TABLE 3.0-2
REASONABLE WORST-CASE PROJECT CONSTRUCTION SCHEDULE

Development Area	Construction Start	Construction End
Demolition / Hydroseeding	June 2025	August 2025
Athletics Field (U5)	June 2025	August 2025
Affordable Housing Building (A1)	April 2026	February 2028
Affordable Housing Building (A2)	April 2026	February 2028
Office Building (U7)	March 2028	January 2030
Student Housing Building (U2)	March 2028	June 2029
Affordable Housing Building (A3)	February 2030	December 2031
Affordable Housing Building (A4)	February 2030	December 2031
Parking Structure (U8)	January 2032	February 2033
Student Housing Building (U1)	January 2032	April 2033
Athletics Building (U6)	August 2033	November 2034
Senior Affordable Housing Building (A5)	August 2033	November 2034
Student Housing Building (U3)	July 2035	October 2036
Faculty/Staff Housing Building (U4)	July 2035	October 2036

SOURCE: CDU, 2024

As illustrated on Figure 2-9 in Chapter 2, there are 13 individual development areas associated with the Proposed Project. The environmental analysis also includes initial construction activities involving demolition and hydroseeding to stabilize the onsite soils to prevent topsoil erosion. Demolition activities would involve the removal of the existing foundations, asphalt, and concrete (approximately 3,500 cubic yards) that were left after the school operations relocated and the school buildings removed. Hydroseeding is assumed to occur throughout the Project site except for the Athletic Building (U6) location because this area that encompasses approximately 1.2 acres is assumed to receive imported gravel (approximately 490 cubic yards) to accommodate short-term parking prior to the construction of the Parking Structure (U8).

3.0.4 Organization of Environmental Issue Area

The Proposed Project is expected to achieve the objectives outlined in Section 2.3 of Chapter 2 of this Addendum to Final PEIR. Environmental resources that are addressed in Sections 3.1 through 3.20 include a discussion of the environmental setting, regulatory setting, thresholds of significance, and impacts (which includes a discussion of mitigation measures). A brief description of these components that are addressed is provided below.

Introduction

This section provides a brief discussion of the specific issues that are addressed and a summary of the types of information documented. Where applicable, this section includes a reference to any technical documentation prepared for the Proposed Project.

Environmental Setting

This section provides an update to the existing conditions documentation provided in the Final PEIR for each environmental impact section. The Approved Specific Plan Program was evaluated against the conditions that existed when the EIR commenced. The Proposed Project is compared to the current conditions in determining its project-specific impact and its contribution to a cumulative impact.

Regulatory Setting

The Regulatory Setting section provides a summary of the regulatory environment as it currently exists. The regulatory framework used in this Addendum to Final PEIR includes the relevant federal, state, regional, and local regulations and policies that are applicable to the Proposed Project.

Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, significance criteria have been developed for each environmental resource and are defined at the beginning of each impact analysis section. The significance of potential impacts is categorized as follows:

- **Significant and Unavoidable**: mitigation might be recommended but impacts remain significant;
- **Significant**: mitigation is required and impacts are potentially significant prior to inclusion of mitigation measures;
- **Less than Significant with Mitigation**: potentially significant impact but mitigated to less than significant;
- **Less than Significant**: mitigation is not required under CEQA; or
- **No Impact**. Mitigation is not required under CEQA.

Impacts Analysis

This section includes a summary of the impacts of the Approved Specific Plan Program as discussed in the Final PEIR. In addition, this section includes a discussion of the changes that may occur to existing physical conditions if the Proposed Project is implemented. The evaluations of these changes are based upon the identified significance criteria. This section also includes a project-level impact analysis and a cumulative impact analysis. The analysis estimates the magnitude of each impact without the adoption of any mitigation measures, considers the mitigation measures required for the Approved Specific Plan Program and identifies feasible mitigation, or revisions to existing mitigation measures, for any potentially significant project-level or cumulative impacts. Mitigation measures are those measures that could avoid, minimize, or reduce an environmental impact.

Conclusion

This section compares the Proposed Project's level of impact with the impact of the Approved Specific Plan Program as identified in the Final PEIR. This discussion also includes a comparison of the level of impact after the implementation of mitigation measures. The resulting impacts could be identified as "no impact," "less than significant impact," or "significant and unavoidable impact". If the Proposed Project includes the same or less adverse impact conclusion as the Approved Specific Plan Program, the decision makers for the Proposed Project can rely on the same Findings of Fact that was prepared pursuant to CEQA Section 15091 and adopted for the Approved Specific Plan Program. In addition, if the Proposed Project includes a similar "significant and unavoidable impact" conclusion as the Approved Specific Plan Program, the decision makers for the Proposed Project can rely on the same statement of overriding considerations that were prepared pursuant to CEQA Section 15093 and adopted for the Approved Specific Plan Program.

3.0.5 Cumulative Analysis

The cumulative analyses for the Approved Specific Plan Program were summarized from the Final PEIR. The cumulative analyses for the Proposed Project were prepared in accordance with Section 15130 of the State CEQA Guidelines that requires cumulative impacts of a project to be discussed when the incremental effects of a project are cumulatively considerable. "Cumulative impacts" are defined as two or more individual effects that, when considered together, are considerable or that compound or increase environmental impacts as identified in CEQA Guidelines Section 15355. "Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. According to CEQA Guidelines Section 15130(b), elements considered necessary to provide an adequate discussion of cumulative impacts of a project include either (1) list of past, present, and probable future projects producing related or cumulative impacts or (2) a summary of projections contained in an adopted local, regional, or statewide plan, or related planning document that is designed to evaluate regional or area-wide conditions. The cumulative analysis conducted for the Proposed Project includes the list of past, present, and probable future projects producing related or cumulative impacts. This list of projects is provided in Table 3.0-1.

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3.1 Aesthetics

3.1.1 Introduction

This section addresses aesthetic and visual resources related to scenic vistas, scenic resources within a state scenic highway corridor, visual character, and light and glare that are within or visible from the Project area, and the potential of the Proposed Project to impact those resources. This section includes a summary of the environmental setting and the identification of any applicable changes to the environmental setting that may have occurred since the certification of the Final PEIR. In addition, a summary of the applicable regulatory setting included in the Final PEIR and any substantive revisions to the regulatory setting that has occurred since the certification of the Final PEIR. This section also includes the thresholds of significance and a brief summary of the aesthetic and visual resource impacts and mitigation measures addressed in the Final PEIR as well as the potential aesthetic and visual resource impacts and mitigation measures associated with the Proposed Project. Finally, this section provides a conclusion of whether (1) the Proposed Project includes substantial changes that would require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact related to aesthetics; (2) substantial changes in the circumstances under which the Proposed Project is undertaken would require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact related to aesthetics; or (3) new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3) exist related to aesthetics.

3.1.2 Environmental Setting

The Project site is within the unincorporated community of Willowbrook that is located in the southeast region of Los Angeles County. The community is bounded by the cities of Hawthorne to the West, Lynwood to the East, Gardena to the Southwest, and Compton to the Southeast. Interstate 110 (I-110) defines the community's western boundary and Imperial Highway defines the northern boundary. The Willowbrook community is urban, developed, and generally flat within major topographic features in the far distance. The Project site includes two abandoned school sites, formerly known as Lincoln Elementary School at 1667 East 118th Street and Barack Obama Charter School at 1726 East 117th Street. Both schools closed in 2017. The structures at Barack Obama Charter School were removed in 2020 while the structures at Lincoln Elementary School were removed in 2023. Building foundations, asphalt and concrete areas as well as non-native grasses and weeds remain on the Project site. Currently, there are four trees on the Project site. Two ash trees are located on the west side of the Project site adjacent to Compton Avenue, one Mexican fan palm tree is located north of E. 118th Street, and one Peruvian Pepper tree is located along the current property line with the I-105 right-of-way.

To the west between portions of the Project site and Compton Avenue, there are existing single and multiple-family residences located north of East 117th Place and south of East 117th Street. On the west side of Compton Avenue, there are also existing single and multiple-family residences.

To the south, between East 118th Street and East 120th Street, there are the Willowbrook Green Apartments, King Drew Magnet High School, Charles R. Drew University of Medicine and Science offices, classrooms, and facilities including the Avis and Mark Ridley Thomas Wellness Center that houses the CDU and APLA Health clinical spaces and the Los Angeles County Child and Family Wellbeing Center. South of East 120th Street is Martin Luther King Jr. (MLK) Medical campus, which is comprised of MLK Community Hospital, MLK Outpatient Center, MLK Community Health Foundation, MLK Behavioral Health, and support facilities.

To the east between the Project site and Holmes Avenue includes Charles R. Drew University of Medicine and Science surface and structured parking immediately adjacent to the site and primarily multiple-family residences east of the existing structured parking and some single-family residences located adjacent to Holmes Avenue. Further to the east between Holmes Avenue and Wilmington Avenue and north of East 120th Street are additional single-family and multiple-family residences, County library, Senior Behavioral parking, the Los Angeles County Fire Department Station 41, and medical offices. The Kenneth Hahn Plaza (retail shopping center) and the Willowbrook – Rosa Parks Metro station is further to the east.

To the north is the I-105 freeway that includes four travel lanes in each direction as well as two Metro railroad tracks within the center median. North of the I-105 and south of Imperial Highway includes the CHC Community Children's Center preschool, multiple-family residential, surface parking, industrial and storage.

Since the certification of the Final PEIR, the Willowbrook community has experienced infill development that includes multiple-family residential complexes east of the Project site adjacent to Wilmington Avenue, new residential units on individual parcels within the community, and a 100-unit multiple-family residential development that is currently under construction north of E. 117th Street and east of Compton Avenue near the Project site.

As was identified in the Final PEIR, there are no designated state scenic vistas within or in the vicinity of the Project site (Caltrans 2019). In addition, distant views from the Project site are of trees and/or buildings. There are no topographic features such as hills, mountains, or water bodies that are visible from the Project site. There are also no features within the vicinity of the Project site or on the Project site that cause substantial light and glare.

3.1.3 Regulatory Setting

State

Scenic Highway Program

Established in 1963, California's Scenic Highway Program is administered by Caltrans and is designed to preserve and protect scenic highway corridors from changes that would diminish their aesthetic value. A highway may be designated scenic depending upon how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes upon the traveler's enjoyment of the view. The city or county in which the highway is located must adopt a Corridor Protection Program that consists of ordinances, zoning and/or planning policies that would preserve the scenic quality of the corridor, or they must

document such regulations that already exist in various portions of local codes. A highway may also be listed as "eligible" for designation as a scenic highway before (County of Los Angeles 2015).

Local

General Plan Conservation and Natural Resources Element

The Conservation and Natural Resources Element of the County's 2035 General Plan guides the long-term conservation of scenic resources. The following policy is relevant to the Proposed Project.

Policy 13.3: Reduce light trespass, light pollution and other threats to scenic resources.

Willowbrook Transit-Oriented District Specific Plan

The Specific Plan also includes light and glare performance standards for mixed use zones in Section 3.5 (D)(4). Developments within the mixed use zones in Specific Plan Program are required to comply with the following standards (County of Los Angeles, 2018).

> **Light and Glare.** All outdoor lighting associated with non-residential uses adjacent to or within the immediate vicinity of residential uses shall be designated with fixtures and poles that illuminate non-residential uses, while minimizing light trespass into residential areas. An unacceptable level of light trespass shall be 0.8 foot-candles or greater when light trespass falls onto an adjoining residentially-zoned lot, or open space-zoned lot.

In addition, the Specific Plan includes exterior lighting design standards for mixed use, commercial and institutional uses that address both light and glare in Section 3.14 (12). Mixed use, commercial and institutional developments within the Specific Plan Program are required to comply with the following design guidelines (County of Los Angeles, 2018).

> **Exterior lighting**
>
> a) Exterior lighting shall be used to provide illumination for the security and safety of on-site areas such as building entrances, parking, loading, shipping and receiving, walkways, and working areas. The design of light fixtures and their structural support shall be architecturally compatible with the main buildings on-site.
>
> b) Site, parking lot and building security lighting shall not impact surrounding or neighboring properties. The type and location of such lighting shall preclude direct glare onto adjoining property, streets, or skyward. All fixtures must be shielded to confine light spread on-site.
>
> c) In mixed use projects, all site, parking lot and building security lighting shall be appropriately shielded so as not to spill over, into or otherwise adversely impact the residential portion of a mixed use development.

3.1.4 Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines and the County of Los Angeles Environmental Checklist Form, the project could have a significant impact related to aesthetics if it would:

- Have a substantial adverse effect on a scenic vista (see Impact 3.1-1, below).
- Be visible from or obstruct views from a regional riding, hiking trail, or multi-use trail (see Impact 3.1-2, below).
- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway (see Impact 3.1-3, below).
- Substantially degrade the existing visual character or quality of the site and its surroundings because of height, bulk, pattern, scale, character or other features or conflict with applicable zoning and other regulations governing scenic quality (see Impact 3.1-4).
- Create a new source of substantial shadows, light, or glare which would adversely affect day or nighttime views in the area (see Impact 3.1-5, below).

3.1.5 Impact Analysis

Scenic Vistas

Impact 3.1-1: The Specific Plan Program and Proposed Project would result in no impacts and would not have a cumulatively considerable adverse effect on a scenic vista.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Final PEIR identified that the Willowbrook community is completely urbanized with a relatively flat topography and thus, views are generally of adjacent urban development and associated landscaping. Additionally, the Specific Plan Program area is not located within or adjacent to an officially designated county route, federal byway, or eligible highway of scenic value. The Specific Plan Program included the redevelopment and infill development within the existing developed urban environment and views along the roadway corridors would remain of urban development. Therefore, due to the flat topography and urbanized development, the Specific Plan Program would not result in impacts to a scenic vista.

Cumulative

The cumulative aesthetics study area for the Specific Plan Program is the viewshed (locations that can view the Specific Plan Program area and locations that can be viewed from within the Specific Plan Program area) that the Specific Plan Program lies within. As described above, there are no existing scenic vistas within or near the Specific Plan Program area. Thus, a scenic vista resource does not exist, and cumulative development in the vicinity of the Specific Plan Program would result in no impact on a scenic vista. Because the Specific Plan Program would not result in an impact on a scenic vista, the Specific Plan Program would not have a cumulatively considerable impact related to a scenic vista.

Proposed Project Evaluation

Proposed Project-Specific

A viewshed is a geographic area composed of landforms, water surfaces, coastlines, open spaces, hiking trails, vegetation, cultural elements, and/or manmade structures that are seen from one or more viewpoints and that has inherent scenic qualities and/or aesthetic value as determined by those who view it. Based on the flat topography of the Project site, there are no scenic vistas or resources with high or unique scenic value within the Project site or surrounding areas. Additionally, the Project site is not located within or adjacent to a designated scenic view or vista. Therefore, the Proposed Project would have no impact on scenic vistas.

Cumulative

The cumulative aesthetics study area for the Proposed Project is the viewshed (locations that can view the Project site and locations that can be viewed from within the Project site) that the Project lies within. As described above, there are no existing scenic vistas within or near the Project site. Thus, a scenic vista resource does not exist, and cumulative development in the project vicinity would result in no impact on a scenic vista. Because the Proposed Project would not result in an impact to a scenic vista, the Proposed Project would not contribute to a cumulatively considerable impact related to a scenic vista.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the implementation of the Proposed Project would not impact aesthetic resources related to scenic vistas. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Views from Regional Riding, Hiking, or Multi-Use Trail

Impact 3.1-2: The Specific Plan Program and Proposed Project would result in no impacts and would not contribute to cumulative impacts on views from a regional riding, hiking or multi-use trail.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Initial Study/Notice of Preparation and Final PEIR identified that the Specific Plan Program would result in no impact on scenic views from regional riding, hiking or multi-use trails. The Specific Plan Program area is generally laid out in a grid system of streets and has a relatively flat topography. The streets provide long-range views, which are of other urban developed areas. In addition, street views include parked and moving vehicles, which are consistent with the urban

land uses and character of the community. Views within and surrounding the Specific Plan Program area consist of urban development, both residential and commercial, streets, and associated parking areas, views of I-105 freeway and the Metro lines that can also be seen from the northern portion of the Specific Plan Program area. The Willowbrook community does not have regional riding, hiking, and multi-use trails that provide views of the Specific Plan Program area. Since there are no views of the Specific Plan Program area from regional riding, hiking, and multi-use trails, the Specific Plan Program would have no impact on scenic views from regional riding, hiking, and multi-use trails.

Cumulative

The Final PEIR did not address cumulative scenic view impacts from regional riding, hiking, and multi-use trails because the Specific Plan Program would result in no scenic impacts from these facilities. The cumulative aesthetics study area for the Specific Plan Program is the viewshed (locations that can view the Specific Plan Program areas and locations that can be viewed from within the Specific Plan Program area) that the Specific Plan Program lies within. As described above, there are no views from existing regional riding, hiking, or multi-use trail within or near the Specific Plan Program area. Thus, views of the Specific Plan Program area from regional riding, hiking, and multi-use trail resources do not exist, and cumulative development in the vicinity would result in no impact. Because the Specific Plan Program would not result in an impact to a view from a regional riding, hiking, or multi-use trail, the Specific Plan Program would not have a cumulatively considerable impact related to a view from a regional biking, hiking, or multi-use trail.

Proposed Project Evaluation

Proposed Project-Specific

The Project site has a relatively flat topography with limited street views. Views from the Project site consist of residential uses to the West, CDU and Martin Luther King Hospital facilities to the South, surface parking and a two-story parking structure to the East, and the I-110 to the North. The Project site as well as areas adjacent to the Project site do not have regional biking, hiking, and multi-use trails that provide views of the Project site. Since there are no views of the Project site from regional biking, hiking, and multi-use trails, the Proposed Project would have no impact on views from regional riding, hiking, and multi-use trails.

Cumulative

The cumulative aesthetics study area for the Proposed Project is the viewshed (locations that can view the Proposed Project area and locations that can be viewed from within the Proposed Project area) that the Proposed Project lies within. As described above, there are no existing views of the Project site from regional riding, hiking, or multi-use trails within or near the Project area. Thus, views from regional riding, hiking, and multi-use trails do not exist, and cumulative development in the project vicinity would result in no impact on a view from a regional biking, hiking, and multi-use trail. Because the Proposed Project would not result in an impact to a view from a regional biking, hiking, or multi-use trail, the Proposed Project would not contribute to a cumulatively considerable impact related to a view from a regional biking, hiking, or multi-use trail.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the implementation of the Proposed Project would not impact aesthetic resources related to views from a regional riding, hiking, or multi-use trail. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Scenic Resources

Impact 3.1-3: The Specific Plan Program and Proposed Project would result in no impacts and would not contribute to cumulative impacts on scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Initial Study/Notice of Preparation and Final PEIR identified that the Specific Plan Program area is not located within or adjacent to an officially designated county route, federal byway, or eligible highway of scenic value. Interstate Highway 105 runs east to west along the northern portion of the Specific Plan Program area but is not designated as a scenic highway. Therefore, the Specific Plan Program would not damage scenic resources such as trees, rock outcroppings, and historic buildings within a state scenic highway, and no impacts would occur.

Cumulative

The Final PEIR did not address cumulative scenic resource impacts within a designated scenic highway because there are no designated scenic highways in the vicinity of the Specific Plan Program area. Thus, scenic resources do not exist, and cumulative development in the vicinity of the Specific Plan Program would result in no impact. Because the Specific Plan Program would not result in an impact to a scenic resource, the Specific Plan Program would not contribute to a cumulatively considerable impact related to views.

Proposed Project Evaluation

Proposed Project-Specific

As discussed above for the Specific Plan Program, the Project site is not located within or adjacent to an officially designated county route, federal byway, or eligible highway of scenic value (Caltrans 2019). Therefore, the Proposed Project would not damage scenic resources such as trees, rock outcroppings, and historic buildings within a state scenic highway, and no impacts would occur.

Cumulative

The cumulative aesthetics study area for the Proposed Project is the viewshed (locations that can view the Proposed Project area and locations that can be viewed from within the Proposed Project area) that the Proposed Project lies within. As described above, the Proposed Project is not located within or in the vicinity of a scenic resource. Thus, no scenic resources exist, and cumulative development in the project vicinity would result in no impact. Because the Proposed Project would not result in an impact to a scenic resource, the Proposed Project would not contribute to a cumulatively considerable impact related to a scenic resource.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the implementation of the Proposed Project would not impact aesthetic resources related to scenic resources. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Visual Character

Impact 3.1-4: The Specific Plan Program and Proposed Project would result in a less than significant and less than cumulatively considerable impacts to the existing visual character and quality of the site and its surroundings because of height, bulk, pattern, scale, character or other features, or because of a conflict with applicable zoning and other regulations governing scenic quality.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

As discussed in the Final PEIR in Section 3.8, *Land Use and Planning,* Impact 3.8-4, the Specific Plan Program would result in redevelopment and infill development that would alter the existing visual character throughout the Specific Plan Program area by establishing a more concentrated mixed use development pattern that is consistent with the existing urban character of the area. The Specific Plan Program would also implement pedestrian-oriented streetscape improvements that include street trees, streetlights, street furniture (planters, benches, bicycle parking, trash receptacles, etc.), wayfinding signage, landscaped open space plaza areas, and introduction of more public art, such as at the intersection of Wilmington Avenue and 120th/119th Streets. In addition, large surface parking lots would be discouraged and masked behind building frontages.

The Specific Plan Program would establish new land uses within each of the subareas and would be consistent with the existing character of each of the subareas and surrounding land uses. Additionally, the Specific Plan Program includes specific design standards for each subarea that

provides architectural guidelines, including setbacks, sidewalk widths, signage standards, landscaping standards, and lighting standards to create an attractive environment.

The Specific Plan Program would alter the existing visual character of the Specific Plan Program area by increasing density and implementing streetscape and circulation changes. The visual character of the area and its vicinity would remain urban and would not be degraded. The design guidelines in the Specific Plan were intentionally included to enhance the aesthetics and land use compatibility in each specific subarea, and include requirements for façades, building heights and massing, character and urban pattern. Overall, the Specific Plan Program would enhance, not degrade, the visual character and quality of the area. Therefore, less than significant impacts relating to the existing visual character or quality of the area would occur.

Cumulative

The cumulative aesthetic study area for visual character includes consistency with areas within the Willowbrook community and the areas that are adjacent to the Specific Plan Program area. As described above, the Specific Plan Program area would introduce new land uses in various densities and design standards for all encouraged development that would not degrade the visual character or quality of the Specific Plan Program area. Because the Specific Plan Program would result in a less than significant impact to visual character, the Specific Plan Program would have a less than significant cumulatively considerable impact related to visual character.

Proposed Project Evaluation

Proposed Project-Specific

The Proposed Project consists of the development of 559 residential units and approximately 432,910 square feet (sf) of non-residential land uses, inclusive of a parking structure, affordable housing, student housing, administrative building, facility services. The Proposed Project would include 33 fewer residential units and 41,017 sf of fewer non-residential uses compared to the development evaluated for the Project site within the Final PEIR. The proposed parking structure is consistent with the Specific Plan by discouraging surface parking lots. The Proposed Project would implement pedestrian-oriented streetscape improvements for visibility and safety throughout the Project site. The implementation of Performance Standards which includes a Sustainable Design Guideline, a comprehensive set of Performance Standards and Goals and Policies that serve as guidelines for decision making, would be key to ensure land use compatibility throughout the Project site.

At build-out, the Proposed Project would alter the existing visual character of the Project site by increasing density and new land uses. The density of the Proposed Project is less than identified in the Specific Plan; however, the Proposed Project includes structures of five stories compared to the Specific Plan's four-story limit and includes one eight-story parking structure adjacent to I-105. Although the visual character of the Project site would be altered, the character would remain urban and would not be degraded. With implementation of the design guidelines within the Specific Plan for MU-2 zones (with the allowance of greater building heights), the visual character of the Project site would enhance the aesthetics and land use compatibility of the Project area. Therefore, the Proposed Project would enhance, not degrade, the visual character

and quality of the area. Therefore, the Proposed Project would have less than significant impacts relating to the existing visual character or quality of the area.

Cumulative

The cumulative aesthetic study area for visual character includes consistency with areas within the Willowbrook community and surrounding the Project site. Future cumulative growth is reasonably anticipated to represent orderly, contiguous, and largely infill development that would reinforce the existing urban and developed character of the area. Because cumulative development is expected to be consistent with uses in the surrounding area, cumulative developments are anticipated to result in less than significant environmental effects related to the visual character or quality of the area. As described above, the Proposed Project would introduce new land uses in various densities and design standards that would ensure enhanced visual character or quality of the Project site. The addition of the Proposed Project with cumulative developments in the vicinity of the Project site are expected to result in an improvement to the existing urban and developed character of the area and would result in less than significant visual character impacts. Because the Proposed Project would result in a less than significant impact to visual character, the Proposed Project would have a less than significant cumulatively considerable impact related to visual character.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the implementation of the Proposed Project would have less than significant impacts related to visual character in the already urbanized Proposed Project vicinity. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3)..

Light or Glare

Impact 3.1-5: The Specific Plan Program and Proposed Project would result in less than significant and less than cumulatively considerable shadows, light or glare impacts that would adversely affect day or nighttime views in the area.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Final PEIR determined that the Specific Plan Program would increase overall nighttime lighting because it would result in additional development and a greater intensity and density of land uses that currently exist. New lighting would accompany all new development, and involve exterior lighting for streetlights, parking lots, signs, walkways, and interior lighting, which could

be visible through windows to the outside, and could potentially increase ambient or "spillover" light. In addition, residential uses, considered light-sensitive receptors, are located throughout the Specific Plan Program area, and would be increased by the Specific Plan Program.

Likewise, because the Specific Plan Program includes increased density, the Specific Plan Program has the potential to create substantially more daytime glare than currently exists within the Specific Plan Program area. If not properly designed, sunlight reflecting from windows and large vehicular parking areas could create a substantial increase in glare, and increased exterior lighting would have the potential to increase glare, as well.

Due to the urbanized nature of the Specific Plan Program area, a substantial amount of ambient nighttime light currently exists that limits views of stars and the nighttime sky. Streetlights, headlights, and exterior lighting within the Specific Plan Program area provide a significant amount of existing ambient light. Thus, the increase in light that would occur from the Specific Plan Program would not significantly impact nighttime views of the sky (ability to see the stars) because such views are already limited in an urban setting.

Light emanating from new uses would be required to be either low scaled lighting or shielded to focus lighting and prevent lighting from spilling onto adjacent sensitive uses, such as residential.. The Specific Plan Program includes a light and glare performance standard that would minimize light trespass into residential areas from fixtures and poles. The Specific Plan performance standard requires the illumination of light from the Specific Plan Program uses to be less than 0.8 foot-candles when the light trespass falls onto an adjoining residential zone lot or open space-zoned lot. Compliance with this Specific Plan performance standard would result in a less than significant lighting impact.

Within Chapter 3 (page 44) of the Specific Plan, Performance Standards are included to ensure that sensitive uses (i.e., residential uses) are not adversely impacted by adjacent development. The light and glare performance standard within the Specific Plan states that all outdoor lighting associated with non-residential uses adjacent to or within the immediate vicinity of residential uses shall be designed with fixtures and poles that illuminate non-residential uses, while minimizing light trespass into residential areas.

In regard to glare, the Specific Plan Program would also not result in a substantial increase in daytime glare. The land uses that would be developed within the Specific Plan Program would be typical institutional, commercial, residential, and mixed use structures. Typically, these structures would be designed with non-reflective textured surfaces on building exteriors (such as stucco, brick, stone, wood). The design guidelines identified in Section 3.14 (12) of the Specific Plan require that new development preclude generation of direct glare by ensuring that no surfaces reflect direct glare onto adjoining property, streets, or skyward.

Because the land uses within the Specific Plan Program would be required to comply with the light and glare performance standard and the exterior lighting design guidelines within the Specific Plan, and compliance would be checked by the County through the development plan check process, impacts related to increased sources of light and glare would be less than significant.

The Initial Study/Notice of Preparation and Final PEIR did not specifically address shadow impacts from the implementation of the Specific Plan Program. Because the County of Los Angeles does not have a significance threshold for shadow impacts, this analysis uses the City of Los Angeles shadow significance impact which is the increase of shading a sensitive land use such as residential by more than 50 percent of the day.

The Specific Plan includes building heights that range from 35 feet for residential uses, 50 feet for mixed uses, and 75 feet for the MLK Medical and Drew Educational zones. Due to the limited maximum height for the residential uses, the building height of 35 feet would be similar to existing residential uses within the Specific Plan Program area. Therefore, these uses would not result in a substantial increase in shadows on adjoining uses.

The maximum building heights for the proposed mixed uses in the northwestern portion of the Specific Plan Program area could be located adjacent to existing residential use. However, because the adjacent residential uses are located across Compton Avenue, Willowbrook Avenue or E. 119th Street, the existing setbacks between the existing residential uses and the proposed mixed uses would be at least 50 to 75 feet. With these setbacks and given that increases in shadows during the day would rotate from west to north to east (opposite of the sun), shadow impacts would not increase more than 50 percent during the day.

The maximum heights for proposed buildings within the MLK Medical and Drew Educational zones are separated from existing residential uses by E. 118th Street and an alley on the south side of the MLK Medical Zone. Although a maximum building height is allowed on the south side of the MLK Medical Zone, shadow impacts on the residential uses to the south would not be substantial because shadow impacts would extend from the west, north and east during the day and therefore, nominal shadow impacts would occur south of future buildings onto the residential uses south of the MLK Medical Zone. Shadow impacts would be less than significant.

Cumulative

The cumulative study area for light and glare for the proposed Specific Plan Program is the lighting viewshed (locations that can receive light or glare from the Specific Plan Program area and locations that generate light and glare that can be viewed from within the Specific Plan Program area) that the Specific Plan Program lies within. The Specific Plan Program area is urban and developed, and currently produces light from various urban sources, such as roadways, lighted parking lots, commercial and residential exterior lighting, within the Specific Plan Program area and its vicinity.

Future growth in the project vicinity is anticipated to be similar in character and intensity as existing development and proposed land uses under the Specific Plan Program. As growth occurs, lighting throughout the project vicinity would gradually increase. In addition, cumulative development could incrementally contribute to cumulative daytime glare and reflective impacts. Because the land uses within the Specific Plan Program would be required to comply with the light and glare performance standard and the exterior lighting design guidelines within the Specific Plan, and compliance would be checked by the County through the development plan

check process, the Specific Plan Program's light and glare impacts would be less than cumulatively considerable.

Cumulative development in the vicinity of the Specific Plan Program area would increase the intensity of the area and could increase building heights. The increases in building heights could increase the amount of shadows that is cast during the day. However, because the anticipated development within the Specific Plan area is expected to result in less than significant shadow impacts, the Specific Plan Program's shadow impact would be less than cumulatively considerable.

Proposed Project Evaluation

Proposed Project-Specific

As discussed in Chapter 2, *Project Description*, the Proposed Project consists of the development of 559 residential units and approximately 432,910 sf of non-residential land uses, inclusive of a parking structure, affordable housing, student housing, administrative building, and facility services. The Proposed Project would include 33 fewer residential units and 41,017 sf of fewer non-residential uses compared to the development evaluated for the Project site within the Final PEIR.

The Proposed Project would increase overall nighttime lighting as additional development and density is implemented, which would be less compared to the development identified for the Project site within the Specific Plan Program. The Proposed Project would include six, approximately 60 feet in height, light standards that would provide lighting for the proposed athletic field. The six light standards are proposed to be located as follows: three light standards located on the west side of the athletic field and three light standards located on the east side of the athletic field. The light standards would be located on the north, middle and south sides of the athletic field. In addition, all new onsite development would include new lighting and exterior lighting for street lighting, parking lots, signs, walkways, and interior lighting. The Proposed Project could result in "spillover" light to adjacent land uses considered sensitive receptors. Additionally, ambient nighttime light would also result from the Proposed Project that could have an impact on existing ambient light by limiting views of stars and the nighttime sky.

Compliance with the Specific Plan light and glare performance standard and the exterior lighting design guidelines would minimize illumination of light from the Proposed Project uses to be less than 0.8 foot-candles when the light trespass falls onto an adjoining residential zone lot. In addition, the design guidelines state that lighting shall be appropriately shielded. The Proposed Project's compliance with this Specific Plan performance standard would result in a less than significant lighting impact.

Regarding daytime glare, the Proposed Project land uses and anticipated building materials are anticipated to be similar to those that were assumed for the Specific Plan Program. The building materials anticipated for the proposed structures include non-reflective textured surfaces on building exteriors (such as stucco, brick, stone, concrete, wood). Glare from lighting systems associated with the Proposed Project could also occur. However, the Proposed Project would comply with the Specific Plan design guidelines that state the type and location of lighting shall

preclude direct glare onto adjoining property, streets, or skyward. Therefore, glare impacts associated with the Proposed Project would be less than significant.

Similar to the shadow analysis discussed above for the Specific Plan Program, this analysis for the Proposed Project uses the City of Los Angeles shadow significance impact which is the increase of shading a sensitive land use such as residential by more than 50 percent of the day.

The Proposed Project includes the development of 12 buildings on the Project site. The proposed structures that would be located adjacent to existing residential uses include the Affordable Housing, Senior Affording Housing, Office, and Parking Structure. The remaining structures are proposed within the internal portions of the Project site and would not create shadows onto residential uses located adjacent to the Project site.

Two of the Affordable Housing buildings and the Affordable Senior Housing building are proposed to be 50 feet in height and located north of the Willowbrook Green Apartments. The apartments are two stories and located approximately 70 feet south of the proposed buildings. Impacts on the residential uses to the south would not be substantial because shadow impacts would extend from the west, north and east during the day and therefore, nominal shadow impacts would occur south of future buildings onto the Willowbrook Green Apartments. Shadow impacts would be less than significant.

The Affordable Senior Housing building is proposed to be 50 feet in height with no upper floor setback of 10 feet from the lower floors. The proposed building would be located approximately 75 feet across Compton Avenue from existing residential uses. Shadow impacts from the building to the west would occur in the morning hours; however, shadow impacts would move to the north around noontime and to the east during the late afternoon. Therefore, potential shadow impacts on residences west of Compton Avenue would be less than 50 percent of the day and less than significant.

The Affordable Senior Housing building and two of the Affordable Housing buildings are proposed to be 50 feet in height and located approximately 60 feet south of E. 117th Place from existing residential uses. Shadow impact from the buildings to the north across E. 117th Place would primarily occur during the mid-day hours, while the morning shadows would occur to the west and the afternoon shadows would occur to the east of the buildings. Shadow impacts would not increase by more than 50 percent of the day. Therefore, shadow impacts would be less than significant.

The Office building is proposed to be 70 feet in height and located adjacent to the existing residential uses approximately 20 to the west and between E. 117th Street and E. 117th Place. Shadow impacts from the proposed building would occur during the morning hours; however, shadows would rotate to the north and then to the east after noontime. Shadow impacts on these residences would not increase by more than 50 percent of the day. Therefore, shadow impacts would be less than significant.

The Parking Structure is proposed to be 110 feet in height and adjacent to existing two-story residential use located approximately 20 feet to the west. Shadow impacts from the proposed

Parking Structure would extend substantially to the west during the morning hours; however, shadows would rotate to the north and then to the east after noontime. Shadow impacts on the residential uses west of the proposed Parking Structure would not increase by more than 50 percent of the day. Therefore, shadow impacts would be less than significant.

Cumulative

Future growth in the project vicinity is anticipated to be similar in character and intensity as existing development and proposed land uses under the Proposed Project. As growth occurs, lighting throughout the project vicinity would gradually increase. In addition, cumulative development could incrementally contribute to cumulative daytime glare and reflective impacts. Because the land uses on the Project site would be required to comply with the light and glare performance standard and the exterior lighting design guidelines within the Specific Plan, and compliance would be checked by the County through the development plan check process, the Proposed Project's light and glare impacts would be less than cumulatively considerable.

Cumulative development could also increase the amount of shadows created in the vicinity of the Project site; however, based on the lack of availability of vacant land in the immediate vicinity of the residential uses that would experience increases in shadows from the Proposed Project, cumulative development would not increase shadow impacts onto the same residential uses. Therefore, cumulative development along with the Proposed Project would result in less than significant shadow impacts. As a result, the Proposed Project's shadow impacts would be less than cumulatively considerable.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the implementation of the Proposed Project would have a less than significant impact related to light and glare because the Proposed Project would comply with the Specific Plan light and glare performance standard and design guidelines. In addition, as with the Specific Plan Program, the Proposed Project would result in a less than significant shadow impact on adjacent residential uses. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

3.1.6 References

California Department of Transportation (Caltrans). 2019. *California Scenic Highway Mapping System*. Available at: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa, accessed on July 23, 2024.

County of Los Angeles. 2015. *Los Angeles County General Plan Chapter 9 Conservation and Natural Resources Element*. County. October 2015. Available at: https://case.planning.lacounty.gov/generalplan/generalplan, accessed on July 23, 2024.

County of Los Angeles. 2018. *Willowbrook TOD Specific Plan*. August.

3.2 Agriculture and Forestry

3.2.1 Introduction

This section addresses agricultural and forestry resources related to farmland, zoning for agricultural uses or forest land, forest conservation, and involving other changes to existing environment that result in non-agricultural or non-forest use and the potential of the Proposed Project to impact those resources. This section includes a brief summary of the environmental setting included in the Final PEIR, and the identification of any applicable changes to the agricultural and forestry setting that may have occurred since the certification of the Final PEIR. In addition, a brief summary of the regulatory setting is included. This section also includes the thresholds of significance and a brief summary of the agricultural and forestry resource impacts and any mitigation measures addressed in the Final PEIR as well as the potential agriculture and forestry resource impacts associated with the Proposed Project. Finally, this section provides a conclusion of whether (1) the Proposed Project includes substantial changes that would require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact related to agriculture and forestry resources; (2) substantial changes in the circumstances under which the Proposed Project is undertaken would require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact related to agriculture and forestry resources; or (3) new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3) exist related to agriculture and forestry resources.

3.2.2 Environmental Setting

The Initial Study/Notice of Preparation and Final PEIR identified that the Willowbrook area does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The Specific Plan Program area consists of a developed urban area that does not contain any farmland uses. Because there are no farmland uses, there are no Williamson Act contracts within the Specific Plan Program area. Since the approval of the Specific Plan Program, there have been no changes related to farmland uses within the Specific Plan Program area including the Project site. The Project site is designated Mixed-Use 2 which is intended to provide commercial and residential development, with an emphasis on employment generating uses and residential infill development.

3.2.3 Regulatory Setting

Because the Project site is not designated as farmland by the California Department of Conservation (CDC) or the County of Los Angeles, there are no farmland regulations that are applicable to the Project site. There are also no applicable timberland or forest regulations for the Project site because the site does not contain these resources.

3.2.4 Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines and the County of Los Angeles Environmental Checklist Form, the project could have a significant impact related to agriculture and forestry if it would:

- Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use (see Impact 3.2-1, below).
- Conflict with existing zoning for agricultural use, with a designated Agricultural Resource Area, or with a Williamson Act contract (see Impact 3.2-2, below).
- Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220 (g)), timberland (as defined in Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined in Government Code Section 51104(g)) (see Impact 3.2-3, below).
- Result in the loss of forest land or conversion of forest land to non-forest use (see Impact 3.2.4, below.
- Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use (see Impact 3.2-5, below).

3.2.5 Impact Analysis

Convert Farmland to Non-Agricultural Use

Impact 3.2-1: The Specific Plan Program and Proposed Project would not result in the conversion of Farmland or contribute to cumulative impacts to Farmland.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

As discussed in the Initial Study/Notice of Preparation and Final PEIR, the Specific Plan Program area does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (CDOC, 2015). The Specific Plan Program area consists of a developed urban area that does not contain any farmland uses. Therefore, the Specific Plan Program would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide importance to nonagricultural uses. No impacts related to the conversion of farmland to non-agricultural uses would occur.

Cumulative

The Final PEIR did not address the cumulative conversion of Farmland since the Specific Plan Program would not result in a Farmland conversion impact.

Proposed Project Evaluation

Proposed Project-Specific

The Project site does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (CDOC, 2022a). The Project site consists of urban uses and does not

contain any farmland uses. Therefore, the Proposed Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide importance to nonagricultural uses. No impacts related to the conversion of farmland to non-agricultural uses would occur.

Cumulative

As mentioned, the Proposed Project does not contain Prime Farmland, Unique Farmland, or Farmland of Statewide Importance and no farmland uses currently exists on the Project site or in the Project vicinity. Thus, no agricultural farmland uses exist, and cumulative development in the project vicinity would result in no impact. Because the Proposed Project would not result in an impact to farmland, the Proposed Project would not contribute to a cumulative impact related to the conversion of farmland to non-agricultural use.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the implementation of the Proposed Project would not impact agricultural resources related to farmland. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Conflict with Existing Zoning for Agricultural Use, Designated Agricultural Resource Area or Williamson Act Contract

Impact 3.2-2: The Specific Plan Program and Proposed Project would result in no impacts and would not contribute to cumulative impacts to existing zoning for agricultural use, designated Agricultural Resource Area, or Williamson Act contract.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

As discussed in the Initial Study/Notice of Preparation and Final PEIR, the Specific Plan Program area does not contain an agricultural zoning classification or land use designation and is not regulated by a Williamson Act Contract. No impact would occur from implementation of the Specific Plan Program.

Cumulative

The Final PEIR did not address the cumulative impact on Williamson Act contracts since the Specific Plan Program would not result in the removal of existing Williamson Act contracts.

Proposed Project Evaluation

Proposed Project-Specific

The Project site does not contain an agricultural zoning classification or land use designation and is not regulated by a Williamson Act Contract (CDOC, 2022b). Therefore, the Proposed Project would not result in any impacts to existing zoning for agricultural use, designated Agricultural Resources Area, or Williamson Act contract.

Cumulative

As discussed for the Specific Plan Program, the Project site does not contain agricultural zoning and no agricultural uses exist on the Project site or within the Project vicinity that contain Williamson Act contracts. Thus, no Williamson Act contracts exist, and cumulative development in the project vicinity would result in no impact. Because the Proposed Project would not result in an impact on a Williamson Act contract, the Proposed Project would not contribute to a contribute to a cumulative impact related to a conflict with existing zoning for agricultural use or Williamson Act contract.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the implementation of the Proposed Project would not impact agricultural resources related to current zoning or Williamson Act contract. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Conflict with Existing Zoning for Forest Land or Timberland

Impact 3.2-3: The Specific Plan Program and Proposed Project would result in no impacts and would not contribute to cumulative impacts from conflicts with existing zoning for forest land or timberland.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

As discussed in the Initial Study/Notice of Preparation and Final PEIR, the Specific Plan Program area is not zoned for forest land or zoned as an area designated for timberland protection. Thus, no impact would occur from implementation of the Specific Plan Program.

Cumulative

The Final PEIR did not address this cumulative significance threshold since the Specific Plan Program would not result in impacts or conflicts with existing zoning for forest land or timberland.

Proposed Project Evaluation

Proposed Project-Specific

As discussed for the Specific Plan Program, the Project site does not include any area zoned for forest land or areas designated for timberland protection. Therefore, the Proposed Project would not result in any impacts from conflicts with existing zoning for forest land or timberland.

Cumulative

Based on a review of the Department of Conservation's California Important Farmland Finder, cumulative development areas in the vicinity of the Project site are not zoned for forest or timberland. Therefore, cumulative development would not conflict with zoning for forest land or timberland. Because the Proposed Project would not result in an impact on existing zoning for forest land or timberland, the Proposed Project would not contribute to a cumulative impact related to forest land or timberland.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the implementation of the Proposed Project would not impact forestry resources related to forest land or timberland. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Loss of Forest Land or Conversion of Forest Land to Non-Forest Use

Impact 3.2-4: The Specific Plan Program and Proposed Project would result in no impacts and would not contribute to cumulative impacts from the loss of forest land or conversion of forest land to non-forest use.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

As discussed in the Initial Study/Notice of Preparation and the Final PEIR, the Specific Plan Program area is not zoned for forest land and therefore, no impact from the loss of forest land or conversion of forest land would occur from implementation of the Specific Plan Program.

Cumulative

The Final PEIR did not address this cumulative significance threshold since the Specific Plan Program would result in no impacts to forest land or the conversion of forest land.

Proposed Project Evaluation

Proposed Project-Specific

As discussed for the Specific Plan Program area, the Project site is not zoned for forest land and therefore, no impact from the loss of forest land or conversion of forest land would occur from implementation of the Proposed Project.

Cumulative

Cumulative development areas in the vicinity of the Project site are not zoned for forest or timberland. Therefore, cumulative development would have no impact on forest land or the conversion of forest land. Because the Proposed Project would not result in an impact on forest land, the Proposed Project would not contribute to a cumulative impact related to the loss of forest land or conversion of forest land to non-forest use.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the implementation of the Proposed Project would not impact forestry resources related to the loss of forest land or conversion of forest land to non-forest use. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Involve Other Changes Resulting in the Conversion to Non-Agricultural Use or Conversion to Non-Forest Use

Impact 3.2-5: The Specific Plan Program and Proposed Project would result in no impacts and would not contribute to cumulative impacts involving conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

As discussed in the Initial Study/Notice of Preparation and Final PEIR, the Specific Plan Program area does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Furthermore, the Specific Plan Program area is not zoned for forest land. The Specific Plan Program area consists of a developed urban area that does not contain any farmland

or forest land uses. Therefore, the Specific Plan Program would result in no impact involving the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.

Cumulative

The Final PEIR did not address this cumulative significance threshold since the Specific Plan Program would result in no impacts involving conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.

Proposed Project Evaluation

Proposed Project-Specific

As discussed for the Specific Plan Program area, the Project site does not contain any Farmland or forest land and therefore, implementation of the Proposed Project would result in no impact involving the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.

Cumulative

Cumulative development areas in the vicinity of the Project site are not zoned for agriculture or forest land. Therefore, cumulative development would have no impact on agriculture or forest land or the conversion of agriculture or forest land. Because the Proposed Project would not result in an impact on agricultural and forest land, the Proposed Project would not contribute to a cumulative impact related conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the implementation of the Proposed Project would not impact agricultural and forestry resources related to the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

3.2.6 References

California Department of Conservation (CDOC). 2022a. *California Important Farmland Finder*. Available online: https://maps.conservation.ca.gov/dlrp/ciff/. Accessed July 24, 2024.

CDOC. 2022b. *California Williamson Act Enrollment Finder*. Available online: https://maps.conservation.ca.gov/dlrp/WilliamsonAct/. Accessed July 24, 2024.

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County of Los Angeles. 2022. *Los Angeles County General Plan, Chapter 6 Land Use Element*. County. Updated July 14, 2022. Available at: https://case.planning.lacounty.gov/assets/upl/project/gp_final-general-plan-ch6.pdf. Accessed on July 24, 2024.

NRCS (Natural Resources Conservation Service). 2022. Farmland Protection Policy Act. Available online: https://www.nrcs.usda.gov/conservation-basics/natural-resource-concerns/land/cropland/farmland-protection-policy-act. Accessed July 24, 2024.

3.3 Air Quality

3.3.1 Introduction

This section addresses current air quality impacts, and the potential of the implementation of the Proposed Project to result in impacts associated with violation of air quality standards, cumulatively considerable increases in criteria pollutants, and sensitive receptors. This section includes an update of the environmental setting on and in the vicinity of the Project site and identifies any applicable changes to the air quality conditions that may have occurred since the certification of the Final PEIR. In addition, a brief summary of the regulatory setting included in the Final PEIR and any substantive revisions to the regulatory setting that has occurred since the certification of the Final PEIR. This section also includes the thresholds of significance and a brief summary of the impacts associated with air quality and mitigation measures addressed in the Final PEIR as well as the potential air quality impacts associated with the Proposed Project. Finally, this section provides a conclusion of whether (1) the Proposed Project includes substantial changes that would require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact related to air quality; (2) substantial changes in the circumstances under which the Proposed Project is undertaken would require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact related to air quality; or (3) new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3) exist related to air quality.

3.3.2 Environmental Setting

Regional Setting

As with the Specific Plan Program area, the Project site is located in the western portion of the South Coast Air Basin (Air Basin). The Air Basin includes all of Orange County, Los Angeles County (excluding the Antelope Valley portion), the western, non-desert portion of San Bernardino County, the western Coachella Valley and San Gorgonio Pass portions of Riverside County, and the non-desert portions of Los Angeles County, Riverside County, and San Bernardino County. The South Coast Air Quality Management District (SCAQMD) is the local air district with jurisdiction over air pollution sources in the Air Basin. While air quality in the Air Basin has improved, the Air Basin requires continued diligence to meet the air quality standards.

Ambient Air Quality Standards

Criteria Air Pollutants

Certain air pollutants have been recognized to cause notable health problems and consequential damage to the environment either directly or in reaction with other pollutants, due to their presence in elevated concentrations in the atmosphere. Such pollutants have been identified and regulated as part of the overall endeavor to prevent further deterioration and facilitate improvement in air quality. The following pollutants are regulated by the United States Environmental Protection Agency (USEPA) and are subject to emissions control requirements

adopted by Federal, State and local regulatory agencies. These pollutants are referred to as "criteria air pollutants" as a result of the specific standards, or criteria, which have been adopted for them. A description of the health effects of these criteria air pollutants is provided below.

Criteria air pollutants of concern in the Air Basin include ozone (O_3), carbon monoxide (CO), and particulate matter (PM10 and PM2.5), as concentrations of these pollutants are above state and/or national ambient air quality standards. Sulfur dioxide, lead, visibility reducing particulates, sulfates, hydrogen sulfide, and vinyl chloride concentrations are well below state and/or national ambient air quality standards and are not air pollutants of concern in the Air Basin. **Table 3.3-1,** *Health and Environmental Effects of Criteria Air Pollutants of Concern,* lists the health effects associated with the criteria air pollutants of concern.

TABLE 3.3-1
HEALTH AND ENVIRONMENTAL EFFECTS OF CRITERIA AIR POLLUTANTS OF CONCERN

Pollutant	Adverse Effects
Ozone	• People most at risk from breathing air containing ozone include people with asthma, children, older adults, and people who are active outdoors, especially outdoor workers. In addition, people with certain genetic characteristics, and people with reduced intake of certain nutrients, such as vitamins C and E, are at greater risk from ozone exposure. • Breathing ozone can trigger a variety of health problems including chest pain, coughing, throat irritation, and airway inflammation. It also can reduce lung function and harm lung tissue. Ozone can worsen bronchitis, emphysema, and asthma, leading to increased medical care. • Ozone affects sensitive vegetation and ecosystems, including forests, parks, wildlife refuges and wilderness areas. In particular, ozone harms sensitive vegetation during the growing season.
Carbon Monoxide	• Breathing air with a high concentration of CO reduces the amount of oxygen that can be transported in the blood stream to critical organs like the heart and brain. • At very high levels, which are possible indoors or in other enclosed environments, CO can cause dizziness, confusion, unconsciousness and death. • Very high levels of CO are not likely to occur outdoors. However, when CO levels are elevated outdoors, they can be of particular concern for people with some types of heart disease. These people already have a reduced ability for getting oxygenated blood to their hearts in situations where the heart needs more oxygen than usual. They are especially vulnerable to the effects of CO when exercising or under increased stress. In these situations, short-term exposure to elevated CO may result in reduced oxygen to the heart accompanied by chest pain also known as angina.
Particulate Matter	• Particulate matter contains microscopic solids or liquid droplets that are so small that they can be inhaled and cause serious health problems. Such health effects include aggravating asthma and bronchitis, causing visits to the hospital for respiratory and cardiovascular symptoms, and contributing to heart attacks and deaths. Particles less than 10 micrometers in diameter pose the greatest problems, because they can get deep into your lungs, and some may even enter the bloodstream. • Exposure to such particles can affect both your lungs and your heart. Numerous scientific studies have linked particle pollution exposure to a variety of problems, including: premature death in people with heart or lung disease, nonfatal heart attacks, irregular heartbeat, aggravated asthma, decreased lung function, and increased respiratory symptoms, such as irritation of the airways, coughing, or difficulty breathing. • Fine particles (PM2.5) are the main cause of reduced visibility (haze) in parts of the United States, including many national parks and wilderness areas.
Nitrogen Dioxide	• Breathing air with a high concentration of NO_2 can irritate airways in the human respiratory system. Such exposures over short periods can aggravate respiratory diseases, particularly asthma, leading to respiratory symptoms (such as coughing, wheezing or difficulty breathing), hospital admissions and visits to emergency rooms. Longer exposures to elevated concentrations of NO_2 may contribute to the development of asthma and potentially increase susceptibility to respiratory infections. People with asthma, as well as children and the elderly are generally at greater risk for the health effects of NO_2. • NO_2, along with other oxides of nitrogen (NO_X), reacts with other chemicals in the air to form both particulate matter and ozone. Both of these are also harmful when inhaled due to effects on the respiratory system.

SOURCES: USEPA 2022b, USEPA 2022c, USEPA 2022d, USEPA 2023a, CARB 2024f

Ozone (O3)

Ozone is a secondary pollutant formed by the chemical reaction of volatile organic compounds (VOCs) and nitrogen oxides (NO_X) in the presence of sunlight under favorable meteorological conditions, such as high temperature and stagnation episodes. Ozone concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable. According to the USEPA, ozone can cause the muscles in the airways to constrict potentially leading to wheezing and shortness of breath (USEPA 2024a). Ozone can make it more difficult to breathe deeply and vigorously; cause shortness of breath and pain when taking a deep breath; cause coughing and sore or scratchy throat; inflame and damage the airways; aggravate lung diseases such as asthma, emphysema and chronic bronchitis; increase the frequency of asthma attacks; make the lungs more susceptible to infection; continue to damage the lungs even when the symptoms have disappeared; and cause chronic obstructive pulmonary disease (USEPA 2024a). Long-term exposure to ozone is linked to aggravation of asthma and is likely to be one of many causes of asthma development and long-term exposures to higher concentrations of ozone may also be linked to permanent lung damage, such as abnormal lung development in children (USEPA 2024a). According to the California Air Resources Board (CARB), inhalation of ozone causes inflammation and irritation of the tissues lining human airways, causing and worsening a variety of symptoms and exposure to ozone can reduce the volume of air that the lungs breathe in and cause shortness of breath (CARB 2024a). The USEPA states that people most at risk from breathing air containing ozone include people with asthma, children, older adults, and people who are active outdoors, especially outdoor workers (USEPA 2024a). Children are at greatest risk from exposure to ozone because their lungs are still developing and they are more likely to be active outdoors when ozone levels are high, which increases their exposure (USEPA 2024a). According to CARB, studies show that children are no more or less likely to suffer harmful effects than adults; however, children and teens may be more susceptible to ozone and other pollutants because they spend nearly twice as much time outdoors and engaged in more vigorous activities as compared to adults (CARB 2024a). Children breathe more rapidly than adults and inhale more pollution per pound of their body weight than adults and are less likely than adults to notice their own symptoms and avoid harmful exposures (CARB 2024a). Further research may be able to better distinguish between health effects in children and adults (CARB 2024a).

Volatile Organic Compounds

Volatile organic compounds (VOCs) are organic chemical compounds of carbon and are not "criteria" pollutants themselves; however, they contribute with NO_X to form ozone, and are regulated to prevent the formation of ozone (USEPA 2024b). According to CARB, some VOCs are highly reactive and play a critical role in the formation of ozone, other VOCs have adverse health effects, and in some cases, VOCs can be both highly reactive and have adverse health effects (CARB 2024b). VOCs are typically formed from combustion of fuels and/or released through evaporation of organic liquids, internal combustion associated with motor vehicle usage, and consumer products (e.g., architectural coatings, etc.) (CARB 2024b).

Nitrogen Oxides

Nitrogen oxide (NO_X)is a term that refers to a group of compounds containing nitrogen and oxygen. The primary compounds of air quality concern include nitrogen dioxide (NO_2) and nitric oxide (NO). Ambient air quality standards have been promulgated for NO_2, which is a reddish-

brown, reactive gas (CARB 2024c). The principle form of NO_X produced by combustion is NO, but NO reacts quickly in the atmosphere to form NO_2, creating the mixture of NO and NO_2 referred to as NO_X (CARB 2024c). Major sources of NO_X include emissions from cars, trucks and buses, power plants, and off-road equipment (USEPA 2024c). The terms NO_X and NO_2 are sometimes used interchangeably. However, the term NO_X is typically used when discussing emissions, usually from combustion-related activities, and the term NO_2 is typically used when discussing ambient air quality standards. Where NO_X emissions are discussed in the context of the thresholds of significance or impact analyses, the discussions are based on the conservative assumption that all NO_X emissions would oxidize in the atmosphere to form NO_2. According to USEPA, short-term exposures to NO_2 can potentially aggravate respiratory diseases, particularly asthma, leading to respiratory symptoms (such as coughing, wheezing or difficulty breathing), hospital admissions and visits to emergency rooms, while longer exposures to elevated concentrations of NO_2 may contribute to the development of asthma and potentially increase susceptibility to respiratory infections (USEPA 2024c). According to CARB, controlled human exposure studies that show that NO_2 exposure can intensify responses to allergens in allergic asthmatics (CARB 2024c). In addition, a number of epidemiological studies have demonstrated associations between NO_2 exposure and premature death, cardiopulmonary effects, decreased lung function growth in children, respiratory symptoms, emergency room visits for asthma, and intensified allergic responses (CARB 2024c). Infants and children are particularly at risk from exposure to NO_2 because they have disproportionately higher exposure to NO_2 than adults due to their greater breathing rate for their body weight and their typically greater outdoor exposure duration. In comparison, for adults the greatest risk is to people who have chronic respiratory diseases, such as asthma and chronic obstructive pulmonary disease (CARB 2024c). CARB states that much of the information on distribution in air, human exposure and dose, and health effects is specifically for NO_2 and there is only limited information for NO and NO_X, as well as large uncertainty in relating health effects to NO or NO_X exposure (CARB 2024c).

The entire Basin has not exceeded both federal and State standards for NO_2 in the past five years with published monitoring data. It is designated as a maintenance area under the federal standards and an attainment area under the state standards.

Sulfur Dioxide

According to USEPA, the largest source of sulfur dioxide (SO_2) emissions in the atmosphere is the burning of fossil fuels by power plants and other industrial facilities while smaller sources of SO_2 emissions include industrial processes such as extracting metal from ore; natural sources such as volcanoes; and locomotives, ships and other vehicles and heavy equipment that burn fuel with a high sulfur content (USEPA 2024d). In 2006, California phased-in the ultra-low-sulfur diesel regulation limiting vehicle diesel fuel to a sulfur content not exceeding 15 parts per million, down from the previous requirement of 500 parts per million, substantially reducing emissions of sulfur from diesel combustion (CARB 2004). According to USEPA, short-term exposures to SO_2 can harm the human respiratory system and make breathing difficult (USEPA 2024d). According to CARB, health effects at levels near the State one-hour standard are those of asthma exacerbation, including bronchoconstriction accompanied by symptoms of respiratory irritation such as wheezing, shortness of breath and chest tightness, especially during exercise or physical activity and exposure at elevated levels of SO_2 (above 1 part per million (ppm)) results in

increased incidence of pulmonary symptoms and disease, decreased pulmonary function, and increased risk of mortality (CARB 2024d). Children, the elderly, and those with asthma, cardiovascular disease, or chronic lung disease (such as bronchitis or emphysema) are most likely to experience the adverse effects of SO_2 (USEPA 2024d).

Lead

Major sources of lead (Pb) emissions include ore and metals processing, piston-engine aircraft operating on leaded aviation fuel, waste incinerators, utilities, and lead-acid battery manufacturers (USEPA 2024e). In the past, leaded gasoline was a major source of lead emissions; however, the removal of lead from gasoline has resulted in a decrease of lead in the air by 98 percent between 1980 and 2014 (USEPA 2024e). Lead can adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems and the cardiovascular system, and affects the oxygen carrying capacity of blood (USEPA 2024e). The lead effects most commonly encountered in current populations are neurological effects in children, such as behavioral problems and reduced intelligence, anemia, and liver or kidney damage (CARB 2024e). Excessive lead exposure in adults can cause reproductive problems in men and women, high blood pressure, kidney disease, digestive problems, nerve disorders, memory and concentration problems, and muscle and joint pain (CARB 2024e).

Particulate Matter

Particulate matter air pollution is a mixture of solid particles and liquid droplets found in the air (USEPA 2024f). Some particles, such as dust, dirt, soot, or smoke, are large or dark enough to be seen with the naked eye while other particles are so small they can only be detected using an electron microscope (USEPA 2024f). Particles are defined by their diameter for air quality regulatory purposes: inhalable particles with diameters that are generally 10 micrometers (µm) and smaller (PM10); and fine inhalable particles with diameters that are generally 2.5 µm and smaller (PM2.5) (USEPA 2024f). Thus, PM2.5 comprises a portion or a subset of PM10. Sources of PM10 emissions include dust from construction sites, landfills and agriculture, wildfires and brush/waste burning, industrial sources, and wind-blown dust from open lands (CARB 2024f). Sources of PM2.5 emissions include combustion of gasoline, oil, diesel fuel, or wood (CARB 2024f). PM10 and PM2.5 may be either directly emitted from sources (primary particles) or formed in the atmosphere through chemical reactions of gases (secondary particles) such as SO_2, NO_X, and certain organic compounds (CARB 2024f). According to CARB, both PM10 and PM2.5 can be inhaled, with some depositing throughout the airways; PM_{10} is more likely to deposit on the surfaces of the larger airways of the upper region of the lung while PM2.5 is more likely to travel into and deposit on the surface of the deeper parts of the lung, which can induce tissue damage, and lung inflammation (CARB 2024f). Short-term (up to 24 hours duration) exposure to PM10 has been associated primarily with worsening of respiratory diseases, including asthma and chronic obstructive pulmonary disease, leading to hospitalization and emergency department visits (CARB 2024f). The effects of long-term (months or years) exposure to PM10 are less clear, although studies suggest a link between long-term PM10 exposure and respiratory mortality. The International Agency for Research on Cancer published a review in 2015 that concluded that particulate matter in outdoor air pollution causes lung cancer (CARB 2024f). Short-term exposure to PM2.5 has been associated with premature mortality, increased hospital admissions for heart or lung causes, acute and chronic bronchitis, asthma attacks,

emergency room visits, respiratory symptoms, and restricted activity days and long-term exposure to PM2.5 has been linked to premature death, particularly in people who have chronic heart or lung diseases, and reduced lung function growth in children (CARB 2024f). According to CARB, populations most likely to experience adverse health effects with exposure to PM10 and PM2.5 include older adults with chronic heart or lung disease, children, and asthmatics and children and infants are more susceptible to harm from inhaling pollutants such as PM10 and PM2.5 compared to healthy adults because they inhale more air per pound of body weight than do adults, spend more time outdoors, and have developing immune systems (CARB 2024f).

Most of the Basin is designated nonattainment for the federal and State PM10 and PM2.5 standards.

Other Criteria Pollutants (California Only)

The California Ambient Air Quality Standards (CAAQS) regulate the same criteria pollutants as the National Ambient Air Quality Standards (NAAQS) but in addition, regulate State-identified criteria pollutants, including sulfates, hydrogen sulfide, visibility-reducing particles, and vinyl chloride (CARB 2024g). With respect to the State-identified criteria pollutants (i.e., sulfates, hydrogen sulfide, visibility reducing particles, and vinyl chloride), the Specific Plan Program or Proposed Project would either not emit them (i.e., hydrogen sulfide and vinyl chloride), or they would be accounted for as part of the estimated pollutants (i.e., sulfates and visibility reducing particles). For example, visibility reducing particles are associated with particulate matter emissions and sulfates are associated with SO_2 emissions. Both particulate matter and SO_2 are included in the emissions estimates.

Toxic Air Contaminants

In addition to criteria pollutants, the SCAQMD periodically assesses levels of toxic air contaminants (TACs) in the Air Basin. The most common TAC in the State is Diesel Particulate Matter, or DPM, which is emitted from the exhaust of diesel engines. DPM is believed to be responsible for about 70 percent of California's estimated known cancer risk attributable to TAC's (CARB 2024h). Diesel particulate matter (DPM), which is emitted in the exhaust from diesel engines, was listed by the State as a carcinogenic TAC in 1998 (CARB 2024b). Most major sources of diesel emissions, such as ships, trains, and trucks operate in and around ports, railyards, and heavily traveled roadways. These areas are often located near highly populated areas resulting in greater health consequences for urban areas than rural areas (CARB 2024i). DPM has historically been used as a surrogate measure of exposure for all diesel exhaust emissions. DPM consists of fine particles (fine particles have a diameter <2.5 µm), including a subgroup of ultrafine particles (ultrafine particles have a diameter <0.1 µm). Collectively, these particles have a large surface area which makes them an excellent medium for absorbing organics. The visible emissions in diesel exhaust include carbon particles or "soot." Diesel exhaust also contains a variety of harmful gases and cancer-causing substances. Construction activities are major sources of diesel emissions, including heavy diesel-fueled construction equipment and trucks.

Exposure to DPM may be a health hazard, particularly to children whose lungs are still developing and the elderly who may have other serious health problems. DPM levels and resultant potential health effects may be higher in proximity to heavily traveled roadways with

substantial truck traffic or near industrial facilities. According to CARB, DPM exposure may lead to the following adverse health effects: aggravated asthma; chronic bronchitis; increased respiratory and cardiovascular hospitalizations; decreased lung function in children; lung cancer; and premature deaths for people with heart or lung disease (CARB 2024i). While there are other common TACs responsible for cancer risk within the Air Basin, these other TACs are not commonly produced during the construction and operations of a project that includes primarily residential uses with university mixed uses, where emission sources would be limited to diesel exhaust from construction equipment.

Odorous Emissions

Though offensive odors from stationary sources rarely cause any physical harm, they still remain unpleasant and can lead to public distress generating citizen complaints to local governments. The occurrence and severity of odor impacts depend on the nature, frequency and intensity of the source; wind speed and direction; and the sensitivity of receptors. Generally, increasing the distance between the receptor and the source will mitigate odor impacts.

Existing Conditions

As previously mentioned, the Project site is located within the South Coast Air Basin (Air Basin). The Air Basin is an approximately 6,745-square-mile area bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The Air Basin consists of Orange County, Los Angeles County (excluding the Antelope Valley portion), and the western non-desert portions of San Bernardino and Riverside counties, in addition to the San Gorgonio Pass area in Riverside County. The terrain and geographical location determine the distinctive climate of the Air Basin, as it is a coastal plain with connecting broad valleys and low hills. The Air Basin lies in the semi-permanent high-pressure zone of the eastern Pacific Ocean. The usually mild climatological pattern is interrupted by periods of hot weather, winter storms, or Santa Ana winds.

The extent and severity of pollutant concentrations in the Air Basin are a function of the area's natural physical characteristics (weather and topography) and man-made influences (development patterns and lifestyle). Factors such as wind, sunlight, temperature, humidity, rainfall, and topography all affect the accumulation and dispersion of pollutants throughout the Air Basin, making it an area of high pollution potential. The Air Basin's meteorological conditions, in combination with regional topography, are conducive to the formation and retention of ozone, which is a secondary pollutant that forms through photochemical reactions in the atmosphere. Thus, the worst air pollution conditions throughout the Air Basin typically occur from June through September. These conditions are generally attributed to the seasonally light winds and shallow vertical atmospheric mixing, which reduce the potential for the dispersal of air pollutant emissions, thereby causing elevated air pollutant levels. Pollutant concentrations in the Air Basin vary with location, season, and time of day. For instance, O_3 concentrations tend to be lower along the coast, higher in the near inland valleys, and lower in the far inland areas of the Air Basin and adjacent desert. While substantial progress has been made in reducing air pollution levels in Southern California, the Air Basin still fails to meet the national standards for O_3 and PM2.5 and, therefore, is considered a federal "non-attainment" area for these pollutants.

Regional Attainment Status

Table 3.3-2, *South Coast Air Basin Attainment Status – Los Angeles County,* provides a summary of the attainment status of the Los Angeles County portion of the Air Basin with respect to federal and state standards. The Air Basin is designated as attainment for the California standards for sulfates and unclassified for hydrogen sulfide and visibility-reducing particles.[1] The Air Basin is currently in non-attainment for O_3, PM10, and PM2.5 under the CAAQS and O_3, and PM2.5 under the NAAQS. Since vinyl chloride is a carcinogenic toxic air contaminant, CARB does not classify attainment status for this pollutant.

TABLE 3.3-2
SOUTH COAST AIR BASIN ATTAINMENT STATUS – LOS ANGELES COUNTY

Pollutant	National Standards (NAAQS)	California Standards (CAAQS)
O_3 (1-hour standard)	N/A[a]	Non-attainment
O_3 (8-hour standard)	Non-attainment – Extreme	Non-attainment
CO	Attainment (Maintenance)	Attainment
NO_2	Attainment (Maintenance)	Attainment
SO_2	Attainment/Unclassifiable	Attainment
PM10	Attainment (Maintenance)	Non-attainment
PM2.5	Non-attainment – Serious	Non-attainment
Lead (Pb)	Non-attainment (Partial) [b]	Attainment
Visibility-Reducing Particles	N/A	Unclassified
Sulfates	N/A	Attainment
Hydrogen Sulfide	N/A	Unclassified
Vinyl Chloride [c]	N/A	N/A

NOTES:

N/A = not applicable

a. The NAAQS for 1-hour ozone was revoked on June 15, 2005, for all areas except Early Action Compact areas.
b. Partial Non-attainment designation – Los Angeles County portion of the Air Basin only for near-source monitors.
c. In 1990, the California Air Resources Board identified vinyl chloride as a toxic air contaminant and determined that it does not have an identifiable threshold. Therefore, the California Air Resources Board does not monitor or make status designations for this pollutant.

SOURCES: USEPA 2023b. The Green Book Non-Attainment Areas for Criteria Air Pollutants, last updated December 23, 2023. https://www.epa.gov/green-book. Accessed on August 2024. CARB 2022. Area Designations Maps/State and National. Available at: http://www.arb.ca.gov/desig/adm/adm.htm. Accessed on August 2024

Existing Health Risk in the Surrounding Area

In August 2021, the SCAQMD released the Final Multiple Air Toxics Exposure Study V (MATES V) (SCAQMD 2024a). The MATES V study includes a fixed site monitoring program with ten stations, an updated emissions inventory of TACs, and a modeling effort to characterize risk across the Air Basin. The purpose of the fixed site monitoring is to characterize long-term regional air toxics levels in residential and commercial areas. In addition to new measurements and updated modeling results, several key updates were implemented in MATES V. MATES V estimates cancer risks by taking into account multiple exposure pathways, which includes inhalation and non-inhalation pathways. This approach is consistent with how cancer risks are

[1] Unclassified means that CARB has not made a status designation for this pollutant in the Air Basin.

estimated in South Coast AQMD's programs such as permitting, Air Toxics Hot Spots (AB 2588), and CEQA. Previous MATES studies quantified cancer risks based on the inhalation pathway only. Along with cancer risk estimates, MATES V includes information on the chronic noncancer risks from inhalation and non-inhalation pathways for the first time. Cancer risks and chronic noncancer risks from MATES II through IV measurements have been re-examined using current Office of Environmental Health Hazard Assessment (OEHHA) and CalEPA risk assessment methodologies and modern statistical methods to examine the trends over time. This has led to a reduction of the Basin Average Air Toxics Cancer Risk in MATES V, 455 in a million, from MATES IV, 997 in a million. The key takeaways from the MATES V study are as follows: air toxics cancer risk has decreased by about 50 percent since MATES IV based on modeling data, MATES V Basin average multi-pathway air toxics cancer risk is 455 in a million, with the highest risk locations being near Los Angeles International Airport, downtown and the ports areas, diesel particulate matter is the main risk driver for air toxics cancer risk, goods movement and transportation corridors have the highest air toxics cancer risks, and the chronic noncancer risk was estimated for the first time with a chronic hazard index of approximately 5 to 9 across the ten fixed stations.[2]

As part of the MATES V, the SCAQMD prepared maps that show regional trends in estimated outdoor inhalation cancer risk from toxic emissions, as part of an ongoing effort to provide insight into relative risks. The maps represent the estimated number of potential cancers per million people associated with a lifetime of breathing air toxics. The potential cancers per million people at the Project site is estimated at 526 per million (SCAQMD 2024b).

Existing Air Quality

The SCAQMD maintains a network of air quality monitoring stations located throughout the Air Basin to measure ambient pollutant concentrations. The Project site is located in Source Receptor Area (SRA) 12 (South Central Los Angeles County) with the Compton Station as closest air quality monitoring station to the Project site, located at 700 North Bullis Road in the City of Compton (approximately 2.6 miles southeast of the Project site boundary). The Compton monitoring station monitors ozone (O_3), CO, NO_2, PM2.5, and Lead. PM10 data is not monitored at Compton Station; the next nearest monitoring station, North Long Beach Hudson, monitors PM10, provided in Table 3.3-3. The nearest station to the Project site that monitors SO_2 is the Central Los Angeles Station.[3] In addition, Table 3.3-3 also compares the pollutant monitoring data to the state and national standards (i.e., NAAQS and CAAQS). Monitoring data from the SCAQMD and CARB for these monitoring stations are from years 2021 to 2023. The pollutant concentration data for these years are summarized in **Table 3.3-3,** *Existing Ambient Air Quality in the Proposed Project Vicinity*. As shown in Table 3.3-3, the CAAQS and NAAQS were not exceeded in the vicinity of the Project site for all pollutants between 2020 and 2022, except for O_3, PM10 and PM2.5.

2 SCAQMD has adopted an air quality significance threshold of 1 for chronic hazard index for individual facilities or projects under CEQA.

3 Central Los Angeles Station PM10 data was reported for year 2021 as the Long Beach Hudson station became operational in 2022.

TABLE 3.3-3
EXISTING AMBIENT AIR QUALITY IN THE PROPOSED PROJECT VICINITY

Pollutant/Standard	2021	2022	2023
O_3 (1-hour)			
Maximum Concentration (ppm)	0.085	0.111	0.084
Days > CAAQS (0.09 ppm)	0	1	0
O_3 (8-hour)			
Maximum Concentration (ppm)	0.076	0.085	0.071
4th High 8-hour Concentration (ppm)	0.062	0.064	0.068
Days > CAAQS (0.070 ppm)	1	1	2
Days > NAAQS (0.070 ppm)	1	1	2
NO_2 (1-hour)			
Maximum Concentration (ppm)	0.068	0.065	0.053
98th Percentile Concentration (ppm)	0.056	0.055	0.048
Days > CAAQS (0.18 ppm)	0	0	0
NO_2 (Annual)			
Annual Arithmetic Mean (0.030 ppm)	0.014	0.0144	0.0127
CO (1-hour)			
Maximum Concentration (ppm)	4.3	3.4	3.2
Days > CAAQS (20 ppm)	0	0	0
Days > NAAQS (35 ppm)	0	0	0
CO (8-hour)			
Maximum Concentration (ppm)	3.7	3.0	2.6
Days > CAAQS (9.0 ppm)	0	0	0
Days > NAAQS (9 ppm)	0	0	0
SO_2 (1-hour)			
Maximum Concentration (ppm)	0.002	0.007	0.008
99th Percentile Concentration (ppm)	0.002	0.002	0.002
Days > CAAQS (0.25 ppm)	0	0	0
Days > NAAQS (0.075 ppm)	0	0	0
SO_2 (24-hour)			
Maximum Concentration (ppm)	–	–	–
Days > CAAQS (0.04 ppm)	–	–	–
Days > NAAQS (0.14 ppm)	–	–	–
PM10 (24-hour)			
Maximum Concentration (µg/m^3)	64	128	148
Samples > CAAQS (50 µg/m^3)	3(5%)	33(9%)	36(10%)
Samples > NAAQS (150 µg/m^3)	0	0	0
PM10 (Annual Average)			
Annual Arithmetic Mean (20 µg/m^3)	25.5	34.4	33.4
PM2.5 (24-hour)			
Maximum Concentration (µg/m^3)	102.1	52.8	54.6
98th Percentile Concentration (µg/m^3)	42.5	32.6	28.1
Samples > NAAQS (35 µg/m^3)	12(3%)	6(2%)	2(1%)
PM2.5 (Annual)			
Annual Arithmetic Mean (12 µg/m^3)	13.41	12.25	11.12
Lead			
Maximum 30-day average (µg/m^3)	0.007	0.010	0.012
Samples > CAAQS (1.5 µg/m^3)	0	0	0

NOTES: ppm = parts per million; µg/m^3 = micrograms per cubic meter

SOURCES: South Coast Air Quality Management District, Historical Data by Year, accessed August 2024, https://www.aqmd.gov/home/air-quality/historical-air-quality-data/historical-data-by-year

Sensitive Receptors

Certain population groups, such as children, elderly, and acutely and chronically ill persons (especially those with cardio-respiratory diseases), are considered more sensitive to the potential effects of air pollution than others. Sensitive land uses within 500 feet of the Project site include: Multi-Family Residential Uses: Located to the north of E. 117th Street, adjacent to the western boundary of the Project site, southwest of the Project site across E. 118th Street, and adjacent to the western boundary of the Project site between E. 117th Street and E. 117th Place. The locations of the sensitive receptors are shown in Figure 3-1, *Existing and Surrounding Land Uses*.

3.3.3 Regulatory Setting

Federal

Light-Duty Vehicle GHG and Fuel Efficiency Standards

In August 2012, the USEPA and USDOT adopted standards for model year 2017 through 2025 for passenger cars and light-duty trucks. By 2020, vehicles are required to achieve a combined standard of 41.7 mpg and 213 grams of CO_2 per mile. By 2025, vehicles are required to achieve 54.5 mpg (if GHG reductions are achieved exclusively through fuel economy improvements) and 163 grams of CO_2 per mile. According to USEPA, a model year 2025 vehicle would emit one-half of the GHG emissions from a model year 2010 vehicle. In 2017, USEPA recommended no change to the GHG standards for light-duty vehicles for model years 2022–2025.

On January 20, 2021, President Biden issued Executive Order 13990 "Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis" directing the USEPA to consider whether to propose suspending, revising, or rescinding the standards previously revised under the "The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021–2026 Passenger Cars and Light Trucks," promulgated in April 2020. In August 2021, the USEPA proposed to revise the GHG standards to be more stringent than the SAFE rule standards in each model year from 2023 through 2026. More recently proposed federal standards for motor vehicle tailpipe emissions include:

- Revocation of the SAFE Vehicles Rule: On March 14, 2022, USEPA published its Notice of Decision to restore California's waiver, which allows California to set more stringent vehicle fuel efficiency standards, rescinding the SAFE Vehicles Rule (Federal Register Volume 87, page 14332).
- Issuance of the Revised 2023 and Later Model Year Light-Duty Vehicle GHG Emissions Standards: The issuance of these standards revises the GHG emissions standards for vehicles from model years 2023–2026 and establishes the most stringent GHG emissions standards ever set for the light-duty-vehicle sector. These standards are expected to result in average fuel economy label values of 40 miles per gallon, while the standards they replace (the SAFE rule standards) would achieve only 32 miles per gallon in model year 2026 vehicles (USEPA 2022a).

Heavy-Duty Engines and Vehicles Fuel Efficiency Standards

On October 25, 2010, the USEPA and the U.S. Department of Transportation proposed the first national standards to reduce greenhouse gas emissions and improve fuel efficiency of heavy-duty trucks and buses (also known as "Phase 1"). The Phase 1 standards generally set standards for reductions in carbon dioxide emissions and fuel consumption for model year 2014 through 2018 engines. Building on the success of the Phase 1 standards, the USEPA and U.S. Department of Transportation jointly finalized additional standards (called "Phase 2") for medium- and heavy-duty vehicles through model year 2027 that further improve fuel efficiency and cut carbon pollution. The Phase 2 final standards are expected to lower CO_2 emissions by approximately 1.1 billion metric tons. On March 29, 2024, the USEPA announced the final Greenhouse Gas Emissions Standards for Heavy-Duty Vehicles – Phase 3 that sets stronger standards to reduce greenhouse gas emissions from heavy-duty vehicles beginning in model year 2027 to model year 2032. The Phase 3 standards will be applicable to heavy-duty vocational vehicles (such as delivery trucks, refuse haulers, public utility trucks, transit, shuttle, school buses, etc.) and tractors (such as day cabs and sleeper cabs on tractor-trailer trucks) and the Phase 3 final standards are expected to lower CO_2 emissions by approximately 1.0 billion metric tons (USEPA 2024g).

State

California Clean Air Act

The California Clean Air Act (CCAA), signed into law in 1988, requires all areas of the state to achieve and maintain the California Ambient Air Quality Standards (CAAQS) by the earliest practical date. CARB, a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration of both State and federal air pollution control programs within California. CARB establishes emissions standards for motor vehicles sold in California, consumer products, and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions. **Table 3.3-4,** *Ambient Air Quality Standards,* shows the NAAQS and CAAQS currently in effect for each criteria pollutant. As shown in Table 3.3-4, the CAAQS are generally more stringent than the NAAQS for certain pollutants.

CARB On-Road and Off-Road Vehicle Rules

Mobile Source Strategy

In October 2021, CARB released the 2020 Mobile Source Strategy, which calls for deployment of approximately 1.4 million medium- and heavy-duty zero-emissions vehicles (ZEVs) in California by 2045, which would reduce GHG emissions by 76 percent from 2020 levels (CARB 2021). The update also establishes goals of 100 percent of sales to be ZEVs for on road light duty vehicles by 2035, and 100 percent of sales of California-registered medium- and heavy-duty trucks to be ZEVs by 2035. These goals are consistent with Executive Order (EO) N-79-20 and SB 44 (CARB 2021).

TABLE 3.3-4
AMBIENT AIR QUALITY STANDARDS

Pollutant	Average Time	California Standards[a]		National Standards[b]		
		Concentration[c]	Method[d]	Primary[c,e]	Secondary[c,f]	Method[g]
O_3[h]	1 Hour	0.09 ppm (180 µg/m^3)	Ultraviolet Photometry	—	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 µg/m^3)		0.070 ppm (137 µg/m^3)		
NO_2[i]	1 Hour	0.18 ppm (339 µg/m^3)	Gas Phase Chemiluminescence	100 ppb (188 µg/m^3)	None	Gas Phase Chemi-luminescence
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)		53 ppb (100 µg/m^3)	Same as Primary Standard	
CO	1 Hour	20 ppm (23 mg/m^3)	Non-Dispersive Infrared Photometry (NDIR)	35 ppm (40 mg/m^3)	None	Non-Dispersive Infrared Photometry (NDIR)
	8 Hour	9.0 ppm (10mg/m^3)		9 ppm (10 mg/m^3)		
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m^3)		—	—	
SO_2[j]	1 Hour	0.25 ppm (655 µg/m^3)	Ultraviolet Fluorescence	75 ppb (196 µg/m^3)	—	Ultraviolet Fluorescence; Spectrophotometry (Pararosaniline Method)
	3 Hour	—		—	0.5 ppm (1300 µg/m^3)	
	24 Hour	0.04 ppm (105 µg/m^3)		0.14 ppm (for certain areas)[j]	—	
	Annual Arithmetic Mean	—		0.030 ppm (for certain areas)[j]	—	
PM10[k]	24 Hour	50 µg/m^3	Gravimetric or Beta Attenuation	150 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m^3		—		
PM2.5[k]	24 Hour	No Separate State Standard		35 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m^3	Gravimetric or Beta Attenuation	12.0 µg/m^3	15 µg/m^3	

Pollutant	Average Time	California Standards[a]		National Standards[b]		
		Concentration[c]	Method[d]	Primary[c,e]	Secondary[c,f]	Method[g]

NOTES:

a. California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM10, PM2.5, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
b. National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM10, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 micrograms/per cubic meter ($\mu g/m^3$) is equal to or less than one. For PM2.5, the 24 hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard.
c. Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
d. Any equivalent procedure which can be shown to the satisfaction of the California Air Resources Board to give equivalent results at or near the level of the air quality standard may be used.
e. National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
f. National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
g. Reference method as described by the USEPA. An “equivalent method” of measurement may be used but must have a “consistent relationship to the reference method” and must be approved by the USEPA.
h. On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.
i. To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.
j. On June 2, 2010, a new 1-hour SO_2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated non-attainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.
k. On December 14, 2012, the national annual PM2.5 primary standard was lowered from 15 $\mu g/m^3$ to 12.0 $\mu g/m^3$.

SOURCE: CARB 2016

Executive Order N-79-20

In September 2020, Governor Newsom issued EO N-79-20 requiring sales of all new passenger vehicles to be zero-emissions by 2035, as well as additional measures to eliminate harmful emissions from the transportation sector. Following the EO, CARB will develop regulations to mandate that 100 percent of in-state sales of new passenger cars and trucks are zero-emissions by 2035—a target that would achieve more than a 35 percent reduction in greenhouse gas emissions and an 80 percent improvement in NO_X emissions from cars statewide. In addition, the Air Resources Board will develop regulations to mandate that all operations of medium- and heavy-duty vehicles shall be 100 percent zero emission by 2045 where feasible, with the mandate going into effect by 2035 for drayage trucks. To ensure needed infrastructure to support zero-emissions vehicles, the order requires state agencies, in partnership with the private sector, to accelerate deployment of affordable fueling and charging options. It also requires support of new and used zero-emissions vehicle markets to provide broad accessibility to zero-emissions vehicles for all Californians. The executive order will not prevent Californians from owning gasoline-powered cars or selling them on the used car market (Office of Governor Newsom 2020).

Senate Bill 44

Adopted in September of 2019, SB 44 requires CARB, no later than January 1, 2021, and at least every 5 years thereafter, in consultation with the Department of Transportation, the State Energy Resources Conservation and Development Commission, and the Governor's Office of Business and Economic Development and in collaboration with relevant stakeholders, to update the CARB Mobile Source Strategy to include a comprehensive strategy for the deployment of medium-duty and heavy-duty vehicles in the state for the purpose of bringing the state into compliance with federal ambient air quality standards and reducing motor vehicle greenhouse gas emissions from the medium-duty and heavy-duty vehicle sector. The bill would require the state board to recommend reasonable and achievable goals, based on specified factors, for reducing emissions from medium-duty and heavy-duty vehicles by 2030 and 2050, respectively, as part of the comprehensive strategy. SB 44 requires CARB to include other specified information in the updates to the Mobile Source Strategy. The bill authorizes the state board to establish a process to identify medium-duty and heavy-duty vehicle segments that can more quickly reduce motor vehicle emissions, consistent with the California Clean Truck, Bus, and Off-Road Vehicle and Equipment Technology Program, with a beachhead market analysis (CA Legislative Information 2019).

Regional

Air Quality Management Plan

The SCAQMD Governing Board adopted the *2022 Air Quality Management Plan* (AQMP) on December 2, 2022 (SCAQMD 2022). On January 26, 2023, CARB adopted Resolution 23-4, which directs the CARB Executive Officer to submit the 2022 AQMP to USEPA for inclusion in the California SIP to be effective, for purposes of federal law, after notice and public hearing as required by Section 110(l) of the Clean Air Act and 40 Code of Federal Regulations Section 51.102 and approval by USEPA. USEPA approval has not yet occurred.

The 2022 AQMP includes strategies to ensure that approaching attainment deadlines[4] for O_3 and PM2.5 are met, and that public health is protected to the maximum extent feasible. The 2022 AQMP is composed of stationary and mobile source emission reductions from traditional regulatory control measures, incentive-based programs, co-benefits from climate programs, mobile source strategies, and reductions from federal sources, which include aircraft, locomotives and oceangoing vessels. These strategies are to be implemented in partnership with CARB and USEPA.

The 2022 AQMP incorporates the transportation strategy and transportation control measures from Southern California Association of Government (SCAG)'s 2020 Connect SoCal (2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)) Plan (SCAG 2020). SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment. SCAG coordinates with various air quality and transportation stakeholders in Southern California to ensure compliance with the federal and state air quality requirements. Pursuant to California Health and Safety Code Section 40460, SCAG has the responsibility of preparing and approving the portions of the AQMP relating to the regional demographic projections and integrated regional land use, housing, employment, and transportation programs, measures, and strategies. SCAG is required by law to ensure that transportation activities "conform" to, and are supportive of, the goals of regional and state air quality plans to attain the NAAQS. The RTP/SCS includes transportation programs, measures, and strategies generally designed to reduce vehicle miles traveled (VMT), which are contained in the AQMP.

The SCAQMD combines its portion of the AQMP with those prepared by SCAG. The RTP/SCS and Transportation Control Measures, included as Appendix IV-C of the 2022 AQMP for the Air Basin, are based on SCAG's 2020–2045 RTP/SCS. The 2022 AQMP forecasts future emissions inventories "with growth" based on SCAG's 2020–2045 RTP/SCS. The region is projected to see a 12 percent growth in population, 17 percent growth in housing units, 11 percent growth in employment, and an 8 percent growth in VMT between 2018 and 2037. Despite regional growth in the past, air quality has improved substantially over the years, primarily due to the effects of air quality control programs at the local, state and federal levels (SCAQMD 2022).

Noteworthy control strategies for mobile sources in the AQMP with potential applicability to reducing short-term emissions from construction activities associated with the Proposed Project include strategies denoted in the 2022 AQMP as MOB-06, MOB-11, and MOB-15, which are intended to reduce emissions from on-road and off-road heavy-duty vehicles and equipment (SCAQMD 2022). Descriptions of measures MOB-06, MOB-11, and MOB-15 are provided below:

- **MOB-06 – Accelerated Retirement of Older On-Road Heavy-Duty Vehicles:** This measure seeks additional emission reductions from existing heavy-duty vehicles with

[4] The South Coast Air Basin was reclassified as extreme non-attainment and must attain the standard by August 2038. The 2022 AQMP shows attainment of the 2015 8-hour ozone standard by 2037.

GVWR greater than 8,500 lbs through an accelerated vehicle replacement program with zero or low NO_X emission vehicles.

- **MOB-11 – Emission Reductions from Incentive Programs:** This control measure seeks to quantify and take credit for the emission reductions achieved through the implementation of SCAQMD administered incentive programs for SIP purposes. The South Coast AQMD has been implementing a variety of incentive programs including, but not limited to, Carl Moyer Memorial Air Quality Standards Attainment Program, Proposition 1B, Lower Emission School Bus, Community Air Protection Program, and Volkswagen Environmental Mitigation Trust. Examples of projects funded by these programs include heavy-duty vehicle/equipment replacements, installation of retrofit units, and engine repowers. These incentive programs result in substantial emission reductions that are typically not eligible for credit in plans to attain ozone standards because they are not required by regulation. However, actual emission reductions that are realized and quantified may qualify for credit.
- **MOB-15 – Zero Emission Infrastructure for Mobile Sources:** This control measure is intended to support and accelerate the deployment of zero emission infrastructure needed for the widespread adoption of zero emission vehicles and equipment. AB 2127 estimated that the State will need 157,000 electric vehicle charging stations for medium and heavy-duty vehicles by 2030. AB 8 assessed the fueling needs for hydrogen fuel cell vehicles and found that 1,700 hydrogen stations will be needed to support 1.8 million fuel cell electric vehicles (FCEVs) statewide by 2035. The proposed measure seeks to address these concerns and identify the unique challenges and opportunities for zero emission infrastructure development in the South Coast Air Basin, particularly as it relates to zero emission medium and heavy vehicle deployments.

Local

Los Angeles County General Plan: Air Quality Element

Local jurisdictions, such as the County of Los Angeles, have the authority and responsibility to reduce air pollution through its police power and decision-making authority. Specifically, the County is responsible for the assessment and mitigation of air emissions resulting from its land use decisions. The County is also responsible for the implementation of transportation control measures as outlined in the AQMP. Examples of such measures include bus turnouts, energy-efficient streetlights, and synchronized traffic signals. In accordance with CEQA requirements and the CEQA review process, the County assesses the air quality impacts of new development projects, requires mitigation of potentially significant air quality impacts by conditioning discretionary permits and monitors and enforces implementation of such mitigation measures.

The Los Angeles County General Plan (County of Los Angeles 2022) provides the fundamental basis for the County's land use and development policy, and represents the basic community values, ideals, and aspirations to govern a shared environment through 2035. The County General Plan addresses all aspects of development including public health, land use, community character, transportation, economics, housing, air quality, and other topics. The County General Plan sets forth objectives, policies, standards, and programs for land use and new development, Circulation and Public access, and Service Systems for the Community as a whole.

The goals and policies of the Air Quality Element of the County General Plan applicable to the Proposed Project are specified below, which will be implemented in connection with development of the Proposed Project (County of Los Angeles 2024).

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

Policy AQ 1.1: Minimize health risks to people from industrial toxic or hazardous air pollutant emissions, with an emphasis on local hot spots, such as existing point sources affecting immediate sensitive receptors.

Policy AQ 1.2: Encourage the use of low or no volatile organic compound (VOC) emitting materials.

Policy AQ 1.3: Reduce particulate inorganic and biological emissions from construction, grading, excavation, and demolition to the maximum extent feasible.

Policy AQ 1.4: Work with local air quality management districts to publicize air quality warnings, and to track potential sources of airborne toxics from identified mobile and stationary sources.

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

Policy AQ 2.1: Encourage the application of design and other appropriate measures when siting sensitive uses, such as residences, schools, senior centers, daycare centers, medical facilities, or parks with active recreational facilities within proximity to major sources of air pollution, such as freeways.

Policy AQ 2.2: Participate in, and effectively coordinate the development and implementation of community and regional air quality programs.

3.3.4 Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines and the County of Los Angeles Environmental Checklist Form, the Proposed Project could have a significant impact related to air quality if it would:

- Conflict with or obstruct implementation of applicable air quality plans of either the South Coast AQMD (SCAQMD) or the Antelope Valley AQMD (AVAQMD) (see Impact 3.3-1, below).
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (see Impact 3.3-2, below).
- Expose sensitive receptors to substantial pollutant concentrations (see Impact 3.3-3, below).

- Result in other emissions (such as those leading to odors adversely affecting a substantial number of people (see Impact 3.3-4, below).

The State CEQA Guidelines (Section 15064.7) provide that, when available, the significance criteria established by other public agencies such as the applicable air quality management district or air pollution control district may be relied upon to make determinations of significance. The potential air quality impacts of the Proposed Project are, therefore, evaluated according to specific thresholds developed by SCAQMD in the *CEQA Air Quality Handbook, Air Quality Analysis Guidance Handbook*, and subsequent guidance, which were also used in the Specific Plan Final PEIR as discussed below.[5]

3.3.5 Impact Analysis

Air Quality Plan

Impact 3.3-1: The Specific Plan Program would result in a significant and unavoidable impact and cumulatively considerable impacts that are unavoidable on the implementation of the applicable air quality plan.

The Proposed Project would result in a significant and cumulatively considerable impacts on the implementation of the applicable air quality plan.

Summary of Final PEIR Evaluation

Approved Plan Program Specific

The Specific Plan Final PEIR determined that with regards to SCAQMD AQMP Consistency Criterion 1, the localized CO hotspot analysis indicated that the Specific Plan Program would not result in a localized CO hotspot, and therefore, no significant adverse impacts are anticipated. Therefore, the Specific Plan Program was found to be consistent with Consistency Criterion 1. However, although the Specific Plan Program would comply with all rules and regulations as implemented by SCAQMD and CARB, and would conform to the land use designations, standards and guidelines of the County General Plan, the Final PEIR identified that the implementation of the Specific Plan Program would exceed SCAG's growth projections in the RTP/SCS, and thus would not be consistent with the 2012 AQMP (the applicable AQMP at the time of the Specific Plan Final PEIR), and therefore, the Specific Plan Program would not comply with Consistency Criterion 2. Therefore, the implementation of the Specific Plan Program would result in significant impact related to conflict with or obstruction with an applicable air quality plan. Therefore, the implementation of Mitigation Measures AIR-1 through AIR-6 would be required and would reduce emissions generated during construction and operational activities. However, even with reduction of emissions, the Specific Plan Program would still result in significant impacts that would conflict with and obstruct the 2012 AQMP.

[5] While the SCAQMD CEQA Air Quality Handbook contains significance thresholds for lead, project construction and operation would not include sources of lead emissions and would not exceed the significance thresholds for lead. Unleaded fuel and unleaded paints have virtually eliminated lead emissions from projects. As a result, lead emissions are not further evaluated.

Cumulative

The Specific Plan Final PEIR determined that cumulative development consisting of the Specific Plan Program along with other reasonably foreseeable future projects would exceed the projections identified in the SCAG RTP/SCS and, therefore, would be in conflict with the AQMP. As a result, cumulative development would result in a significant cumulative impact related to the implementation of the AQMP. In addition, because the Specific Plan Program would include the addition of residential units and non-residential uses that would result in an exceedance of the SCAG growth projections for the Specific Plan Program area, development in accordance with the Specific Plan Program would not be consistent with the AQMP. The Specific Plan Program's impact related to the implementation of the AQMP would be cumulatively considerable. Therefore, the implementation of Mitigation Measures AIR-1 through AIR-6 would reduce the Specific Plan Program's contribution of emissions generated during construction and operational activities; however, even with reduction of emissions, the Specific Plan Program would still result in significant impact and the Specific Plan Program's contribution to the cumulative conflict and obstruction of the 2012 AQMP would remain cumulatively considerable.

Proposed Project Evaluation

Proposed Project-Specific

As discussed in Subsection 3.3.3, *Regulatory Setting*, the AQMP was updated by SCAQMD in 2022. SCAQMD's *CEQA Handbook* suggests an evaluation of the following two consistency criterion to determine whether a project involving a legislative land use action (such as the Proposed Project) would be consistent or in conflict with the AQMP:

1. The project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP, and
2. The project would not generate population and employment growth that would be inconsistent with SCAG's growth forecasts, include air quality mitigation measures, and consistent with the AQMP control measures?

Criterion 1

With respect to the first criterion, as discussed in more detail under the analysis for Impact 3.3-2 below, regional concentrations of VOC, NO_2 as NO_X, SO_2, CO, PM10, and PM2.5 have been analyzed for the Proposed Project. As shown in Tables 3.3-5, which includes implementation of a best management practice and proposed sustainable features related to construction equipment identified in Section 2.4.8 of this Addendum to Final PEIR, regional maximum daily Proposed Project construction emissions would not exceed the SCAQMD regional construction thresholds. Although Mitigation Measure AIR-1 included the use of Tier 4 construction equipment and alternative technologies to reduce construction emissions, the provisions within this mitigation measure have been accepted by the Applicant and is currently a best management practice and proposed as a sustainable feature of the Proposed Project. As shown in Tables 3.3-8, regional maximum daily Proposed Project operational emissions would not exceed the SCAQMD regional operational thresholds. As shown in Table 3.3-6, regional maximum daily Project interim operations emissions would exceed the SCAQMD regional operations emissions thresholds for VOC. With implementation of the construction equipment best management practice and

proposed sustainable features of the Proposed Project (i.e., Tier 4 construction equipment and the use of electric welders during building construction) as well as implementation of Mitigation Measures AIR-2 through AIR-6, as shown in Table 3.3-7, VOC emissions for regional interim operations emissions that include concurrent construction emissions would remain above SCAQMD regional operations emissions threshold for VOCs. As further explained under Impact 3.3-2, this is due to the construction activities that would overlap with the interim operations of the Proposed Project where emissions of VOC from construction activities would overlap with the interim operations of the Proposed Project.

CEQA criteria pollutants significance thresholds from the air district were set at emission levels tied to the region's attainment status; they are emission levels at which stationary pollution sources permitted by the air district must offset their emissions and CEQA projects must use feasible mitigations, and they are not intended to be indicative of any localized human health impact that a project may have (SCAQMD 2015; SJVAPCD 2015). Therefore, just because a project may exceed the mass regional emissions threshold (i.e., pounds per day VOC threshold) from project-related activities does not necessarily indicate that a project will cause or contribute to the exposure of sensitive receptors to ground-level concentrations in excess of health-protective levels.

The primary health concern with exposure to VOC emissions is the secondary formation of ozone. Based on discussions with air quality management district staff, and as the *amicus curiae* brief submitted for the *Sierra Club v. County of Fresno* case (*Friant Ranch Case*) suggested, because of the complexity of ozone formation and given the state of environmental science modeling in use at this time, it is infeasible to determine whether, or the extent to which, a single project's precursor (i.e., NO_X and VOCs) emissions would potentially result in the formation of secondary ground-level ozone and the geographic and temporal distribution of such secondary formed emissions.[6] As previously stated, meteorology, the presence of sunlight, seasonal impacts, and other complex chemical factors all combine to determine the ultimate concentration and location of ozone. Furthermore, available models today are designed to determine regional, population-wide health impacts, and cannot accurately quantify ozone-related health impacts caused by NO_X or VOCs emissions from local level (project-level). Notwithstanding these scientific constraints, the disconnect between project-level VOC emissions and ozone-related health impact cannot be bridged at this time.

As discussed in more detail under the analysis for Impact 3.3-3 below, localized concentrations of NO_2 as NO_X, CO, PM10, and PM2.5 have been analyzed for the Proposed Project. SO_2 emissions would be negligible during construction and long-term operations, in part due to the ultra-low sulfur diesel regulations (13 CCR Section 2281), and, therefore, would not have the potential to cause or effect a violation of the SO_2 ambient air quality standard. Since VOCs are not a criteria pollutant, there is no ambient standard or localized threshold for VOCs. However, due to the role VOCs play in O_3 formation, it is classified as a precursor pollutant, and only a regional emissions threshold has been established.

6 Models available today are designed to determine regional, population-wide health impacts, and cannot accurately quantify ozone-related health impacts caused by NO_X or VOC emissions from a project level.

The Proposed Project's NO_X, CO, PM10, and PM2.5 emissions during construction and operations were analyzed: (1) to ascertain potential effects on localized concentrations; and (2) to determine if there is potential for such emissions to cause or effect a violation of the ambient air quality standards for NO_2, CO, PM10, and PM2.5. As shown in Tables 3.3-10 and 3.3-11 in Impact 3.3 below, localized maximum daily Project construction and operational emissions would not exceed SCAQMD localized construction and operational emissions thresholds. As a result, the Proposed Project would not contribute to a long-term increase in the frequency or severity of an existing violation or cause or contribute to new violations for these pollutants.

The 2022 AQMP is the current SCAQMD-adopted management plan for continued progression toward clean air and compliance with state and federal requirements (it is not yet adopted by the USEPA for inclusion in the State Implementation Plan). The Proposed Project would be required to comply with all new and existing regulatory measures set forth by the SCAQMD so as not to potentially increase the frequency or severity of an existing violation or cause or contribute to a new violation. Implementation of the Proposed Project would not interfere with air pollution control measures listed in the 2022 AQMP and therefore would not delay attainment of the air quality standards.

The Proposed Project would not introduce any substantial stationary sources of emissions; therefore, CO is the appropriate benchmark pollutant for assessing local area air quality impacts from post-construction motor vehicle operations. As indicated below in Impact 3.3, no intersections would result in a CO hotspot in excess of the ambient air quality standards, and impacts would be less than significant. Accordingly, the Proposed Project would not increase the frequency or severity of an existing CO violation or cause or contribute to new CO violations. Therefore, in response to Criterion 1, the Proposed Project could increase the frequency or severity of an existing violation or cause or contribute to new violations for these pollutants. As the Proposed Project could potentially exceed any of the State and federal standards, the Proposed Project could potentially delay timely attainment of air quality standards or interim emission reductions specified in the AQMP, and result in a potentially significant impact. However, as discussed above, this impact would be reduced to less than significant with implementation of the construction equipment best management practice and proposed sustainable features of the Proposed Project and the implementation of Mitigation Measures AIR-2 through AIR-6.

Criterion 2

The Proposed Project's construction would result in an increase in short-term employment compared to existing conditions. Being relatively small in number and temporary in nature, construction jobs under the Proposed Project would not conflict with the long-term employment projections upon which the AQMP is based. Control strategies in the AQMP with applicability to short-term emissions from construction activities include strategies denoted in the 2022 AQMP as MOB-06 and MOB-11 and are intended to reduce emissions from on-road and off-road heavy-duty vehicles and equipment by accelerating replacement of older, emissions-prone engines with newer engines meeting more stringent emission standards. Construction contractors would be required to comply with the CARB Air Toxic Control Measure that limits heavy duty diesel motor vehicle idling to no more than five minutes at any given location with certain limited exceptions defined in the regulation for equipment in which idling is integral to the function of the equipment or activity (such as

concrete trucks and concrete pouring). In addition, contractors would be required to comply with required and applicable BACT and the CARB In-Use Off-Road Diesel Vehicle Regulation to use lower emitting equipment in accordance with the phased-in compliance schedule for equipment fleet operators. The Proposed Project would not conflict with implementation of these strategies. The Proposed Project is also required to comply with SCAQMD regulations for controlling fugitive dust pursuant to SCAQMD Rule 403. Compliance with these requirements is consistent with and meets or exceeds the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities. Furthermore, as discussed above, the Applicant will implement a best management practice and sustainable features related to Tier 4 construction equipment and alternative technologies to reduce construction emissions. The features of the Proposed Project is discussed in Section 2.4.8 of this Addendum to Final PEIR and restated below.

- Construction Equipment. As a best management practice and sustainable feature of the Proposed Project, the construction contractors for each individual development area will use construction equipment that have engines of 25 horsepower (hp) or greater that complies with USEPA Tier 4 Final non-road engine standards and use electric welders during building construction.

Thus, the Proposed Project would implement the Construction Equipment best management practice and sustainable features as well as Mitigation Measures AIR-2 and AIR-4 described below. Thus, the Proposed Project would not conflict with implementation of these strategies. Compliance with these requirements is consistent with and meets or exceeds the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities. Therefore, construction of the Proposed Project would not conflict with or obstruct implementation of the AQMP, and impacts would be less than significant.

The AQMP was prepared to accommodate growth, reduce the levels of pollutants within the areas under the jurisdiction of SCAQMD, return clean air to the region, and minimize the impact on the economy. Projects that are considered consistent with the AQMP would not interfere with attainment because this growth is included in the projections used in the formulation of the AQMP. Subsequent to the approval of the Specific Plan Program, the AQMP has been updated in 2020 as well as 2024 to incorporate the growth projections established within the Specific Plan Program. As described in Section 3.14, *Population and Housing*, of this Addendum to Final PEIR, the Proposed Project would include 559 residential units, approximately 1,643 residents, and 150 employees. These projected increases in residential units, population and employment under the Proposed Project are less than the projected increases identified in the Specific Plan Program for the Project site. Therefore, the Proposed Project would fall within the growth projections as contained in the 2020–2045 RTP/SCS, and ultimately the growth projections in the 2022 AQMP.

Projects, uses, and activities that are consistent with the applicable growth projections and control strategies used in the development of the AQMP would not jeopardize attainment of the air quality reductions identified in the AQMP, even if their emissions exceed the SCAQMD's thresholds of significance (SCAQMD 1993). The Proposed Project's contribution to population, housing and employment would be consistent with SCAG's 2020-2045 RTP/SCS goals, as well

as 2020-2045 RTP/SCS population, housing and employment projections for the County. As a result, the Proposed Project would not conflict with the growth projections and control strategies used in the development in the 2022 AQMP. Impacts would be less than significant. As a result, the Proposed Project would not conflict with or obstruct implementation of the AQMP. Furthermore, the Proposed Project would implement the Mitigation Measures AIR-3 through AIR-6 described below during Proposed Project operations. Thus, the Proposed Project would not conflict with implementation of these strategies. Compliance with these requirements is consistent with and meets or exceeds the AQMP requirements for control strategies intended to reduce emissions from operational equipment and activities. Therefore, operation of the Proposed Project would not conflict with or obstruct implementation of the AQMP, and impacts would be less than significant.

Cumulative

Cumulative development in vicinity of the Proposed Project could exceed SCAG's growth projections in the RTP/SCS used to develop the AQMP. Therefore, cumulative development may not comply with the AQMP, resulting in a significant cumulative impact regarding consistency with the AQMP.

As discussed, the Proposed Project's population and employment projections do not exceed the projections within the Specific Plan Program, as well as the projections identified in the SCAG RTP/SCS used to develop the AQMP. However, because the Proposed Project could potentially delay timely attainment of air quality standards or interim emission reductions specified in the AQMP, the Project's contribution to cumulative impacts related to consistency with the AQMP would be considerable. To reduce the Project's contribution to cumulative impacts to less than significant, the Proposed Project would require implementation of Mitigation Measures AIR-2 through AIR-6 similar to the Specific Plan Program.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, the Proposed Project would require the implementation of Mitigation Measures AIR-2 through AIR-6. The Specific Plan Program included the implementation of Tier 4 construction equipment and alternative technologies as Mitigation Measure AIR-1. Because the provisions of Mitigation Measure AIR-1 have been accepted by the Applicant and is currently a best management practice and proposed as a sustainable feature of the Proposed Project, Mitigation Measure AIR-1 has been removed. In addition, although the Proposed Project does not include fireplaces within the residential buildings, Mitigation Measure AIR-3 is retained. In addition, the provisions within Mitigation Measure AIR-6 are currently required by existing regulations; however, the measure will be retained.

> **Mitigation Measure AIR-1 (Removed):** ~~The County shall ensure that project approvals within the Specific Plan Program area require that all onsite construction vehicles and equipment with horsepower greater than 50 shall meet, at a minimum, USEPA Tier IV interim engine certification requirements. If Tier IV interim equipment is not available, the contractor may apply other available technologies available for construction equipment such that it would achieve a comparable reduction in NOx and PM emissions comparable to that of Tier IV construction equipment. Where alternatives to USEPA Tier IV are utilized, the contractor shall be required to show evidence to the County that these~~

~~alternative technologies would achieve comparable emissions reductions. Certifications or alternative reduction strategies shall be required prior to receiving a construction permit. In addition, contractors shall limit construction equipment idling time to 5 minutes, maintain construction equipment in good operating condition, use construction equipment that uses low-polluting fuels to the extent available and feasible (i.e. compressed natural gas, liquid petroleum gas, and unleaded gasoline).~~

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

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

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

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

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

Conclusion

Unlike the Specific Plan Program's significant impact, the Proposed Project would result in less than significant impacts associated with consistency with the AQMP after the implementation of mitigation measures. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact. Further, there is no new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Cumulative Increase of Criteria Pollutants

Impact 3.3-2: The Specific Plan Program and Proposed Project would result in significant and unavoidable and cumulatively considerable impacts related to a cumulatively considerable net increase of a criteria pollutant for which the Project region is in non-attainment.

Summary of Final PEIR Evaluation

Approved Plan Program Specific

The Final PEIR identified that construction activities associated with the Specific Plan Program would exceed regional significance thresholds for VOC, NOx, and CO. Mitigation Measures AIR-1 and AIR-2 are required to reduce regional air quality construction emissions; however, after the implementation of the mitigation measures, the construction emissions of VOC, NOx and CO would still exceed the SCAQMD daily regional construction significance thresholds for VOC, NO_X and CO. The Final PEIR also found that the Specific Plan Program would exceed regional operational significance thresholds for VOC, NOx, CO, PM10 and PM2.5. Mitigation Measures AIR-3 through AIR-6 are required to reduce regional air quality operational emissions; however, after the implementation of the mitigation measures, the Specific Plan Program operational emissions would still exceed daily operational thresholds for VOC, NO_X, CO, PM10 and PM2.5. Therefore, development in accordance with the Specific Plan Program would result in significant and unavoidable construction and operational impacts related to violation of a regional air quality standard or contribution to an existing or projected air quality violation.

Cumulative

The Final PEIR identified cumulative development would generate daily construction and operational emissions. Because the SCAQMD neither recommends quantified analyses of cumulative construction or operational emissions nor provides methodologies or thresholds of significance to be used to assess cumulative construction and operational impacts, individual projects that exceed the SCAQMD recommended daily thresholds for project-specific impacts would cause a cumulatively considerable impact. It is reasonable to assume that there could be individual projects within the SCAB that exceed the SCAQMD regional construction and operational thresholds. Therefore, cumulative development could result in significant regional construction and operational criteria pollutant emissions. Because the Proposed Project would exceed construction and operational criteria pollutant thresholds, the Proposed Project's contribution to cumulative impacts from construction and operational criteria pollutant emissions would be cumulatively considerable. The implementation of Mitigation Measures AIR-1 and AIR-2 for construction emissions and Mitigation Measures AIR-3 through AIR-6 for operational emissions are required to reduce emissions from development in accordance with the Specific Plan Program; however, construction and operational emissions associated with the Specific Plan Program would remain cumulatively considerable.

Proposed Project Evaluation

Proposed Project-Specific

Construction emissions were estimated using the California Emissions Estimator Model (CalEEMod) version 2022.1. Daily regional emissions during construction are forecasted by assuming a conservative estimate of construction activities starting in 2025 (i.e., assuming all construction occurs at the earliest feasible date) and applying the mobile source and fugitive dust emissions factors. CalEEMod utilizes emission factors for off-road equipment from CARB's OFFROAD model and on-road vehicles from CARB's Emission FACtors (EMFAC) model. OFFROAD and EMFAC emission factors were used to calculate emissions from construction activities, including on- and off-road vehicles. Embedded within CalEEMod 2022.1 are on-road mobile source emission factors from the EMFAC2021 dataset from CARB. The input values used in this analysis are based on CalEEMod default values for construction equipment, worker trips, vendor trips, and hauling trips except where Project-specific information was provided by the Applicant.

Construction of the Proposed Project has the potential to generate temporary criteria pollutant emissions through the use of heavy-duty construction equipment, such as excavators and backhoes, and through vehicle trips generated from workers and haul trucks traveling to and from the Project site. Maximum daily construction emissions were estimated for each construction phase. Construction activities associated with some individual development areas potentially overlap and the maximum daily emissions include these overlaps by combining the relevant construction phase emissions. The maximum daily emissions are predicted values for a representative worst-case day and do not represent emissions that would occur for every day of construction. Detailed emissions calculations are provided in Appendix A of this Addendum to Final PEIR. As stated above, the construction equipment provisions within Mitigation Measure AIR-1 in the Final PEIR have been accepted by the Applicant and is currently a best management practice and proposed as a sustainable feature of the Proposed Project. The sustainable construction equipment will be implemented with the Proposed Project.

The results of the criteria pollutant construction emissions are presented in **Table 3.3-5**, *Maximum Regional Construction Emissions (Pounds per Day)*. The maximum daily construction emissions for the Proposed Project were calculated with the implementation of the sustainable construction equipment. These calculations also assume compliance with applicable dust control measures during each phase of construction, as required by SCAQMD Rule 403 (Control of Fugitive Dust). As seen in Table 3.3-5, regional construction emissions would be below the SCAQMD regional thresholds. Thus, the construction of the Proposed Project would have a less than significant impact with regards to regional construction emissions.[7]

[7] As shown in Table 3.3-5, maximum regional construction emissions would be below the SCAQMD significance thresholds without mitigation, but would be further reduced with the implementation of Mitigation Measure AIR-1, AIR-2 and AIR-4.

TABLE 3.3-5
MAXIMUM REGIONAL CONSTRUCTION EMISSIONS

Year / Construction Phase	Maximum Daily Emissions (pounds per day)					
	VOC	NO_X	CO	SO_2	PM10	PM2.5
2025						
Maximum Daily	0.73	8.99	35.05	0.07	5.09	1.90
2026						
Maximum Daily	0.60	4.59	23.88	0.04	4.85	2.30
2027						
Maximum Daily	16.01	4.32	23.51	0.03	1.19	0.33
2028						
Maximum Daily	0.81	11.89	28.54	0.10	7.70	3.25
2029						
Maximum Daily	20.32	7.47	25.16	0.04	1.76	0.50
2030						
Maximum Daily	0.59	4.68	23.23	0.05	4.97	2.34
2031						
Maximum Daily	17.47	4.27	22.94	0.03	1.35	0.37
2032						
Maximum Daily	1.05	10.55	31.77	0.07	7.07	3.19
2033						
Maximum Daily	26.59	10.43	30.39	0.08	6.97	3.06
2034						
Maximum Daily	18.94	6.15	22.93	0.04	1.04	0.32
2035						
Maximum Daily	0.71	6.60	26.37	0.07	6.69	2.94
2036						
Maximum Daily	41.37	5.64	23.66	0.04	1.87	0.51
SCAQMD Significance Thresholds	75	100	550	150	150	55
Significant Impact?	No	No	No	No	No	No

NOTES:
Totals may not add up exactly due to rounding in the modeling calculations. The maximum daily emissions from either the summer or winter scenario is shown. Detailed emissions calculations are provided in Appendix A of this Addendum to Final PEIR.
SOURCE: ESA 2024

Operational impacts were assessed based on a reasonable worst-case construction schedule for the individual development areas on the Project site. A Proposed Project Interim Year (2032) with concurrent remaining construction and the Proposed Project full buildout year (2037) was assessed. The Proposed Project's operational emissions were estimated using the CalEEMod

software, which was used to forecast the daily regional emissions from area, energy, and mobile sources that would occur during long-term Project operations. Area source emissions were calculated using CalEEMod default assumptions for the proposed land uses. Area sources include consumer product use, architectural coatings, and landscape maintenance equipment. CalEEMod uses landscaping equipment emission factors from the CARB OFFROAD model and the CARB *Technical Memo: Change in Population and Activity Factors for Lawn and Garden Equipment (6/13/2003)*. CalEEMod estimates that landscaping equipment operates for 250 days per year in the South Coast Air Basin. Mobile source emissions are estimated based on the predicted number of trips generated by the Proposed Project determined by the Proposed Project's Transportation Assessment Study (Appendix I of this Addendum to Final PEIR). Operational air quality impacts are assessed based on the incremental increase in emissions compared to baseline conditions. As discussed in Chapter 2, Project Description of this Addendum to Final PEIR, the Project site is currently vacant. Therefore, the Proposed Project's operational emission impacts are net new emissions. Detailed assumptions used in this analysis are included with the CalEEMod printout sheets in Appendix A of this Addendum to Final PEIR. The maximum daily emissions from interim operation and current construction of remaining phases of the Proposed Project are compared to the SCAQMD daily regional numeric indicators shown in **Table 3.3-6,** *Maximum Regional Daily Emissions from Interim Operations and Concurrent Construction of the Proposed Project*. As shown in Table 3.3-6, concurrent Proposed Project interim operations and remaining construction-related daily emissions would exceed the SCAQMD regional significance thresholds for VOC. Therefore, the Proposed Project would incorporate Mitigation Measure AIR-1 through Mitigation Measure AIR-6, as described above. **Table 3.3-7,** *Maximum Mitigated Regional Daily Emissions from Interim Operations and Concurrent Construction of the Proposed Project*, displays the Proposed Project's concurrent mitigated interim operations and remaining construction-related daily emissions. As seen in Table 3.3-7, with implementation of Mitigation Measures AIR-2 through AIR-6, the Proposed Project's mitigated interim operations and remaining construction-related regional VOC emissions would remain above the SCAQMD regional threshold. Thus, the Proposed Project would have a significant and unavoidable impact related to interim operational and concurrent construction regional VOC emissions.

Results of the Proposed Project operational emissions for full buildout are presented in **Table 3.3-8,** *Maximum Regional Daily Emissions from Operations of the Proposed Project*. The increase in unmitigated operational-related daily emissions for the criteria and precursor pollutants would not exceed the SCAQMD threshold of significance for any non-attainment pollutants. Therefore, the Proposed Project regional operational air quality impacts would be less than significant.[8]

[8] As shown in Table 3.3-8, maximum regional construction emissions would be below the SCAQMD significance thresholds without mitigation, but would be further reduced with the implementation of Mitigation Measure AIR-3 through AIR-7.

TABLE 3.3-6
MAXIMUM REGIONAL DAILY EMISSIONS FROM INTERIM OPERATIONS AND CONCURRENT CONSTRUCTION OF THE PROPOSED PROJECT

	Average Daily Emissions (pounds per day)					
Emission Source	**VOC**	**NO_X**	**CO**	**SO_2**	**PM10**	**PM2.5**
Project Interim Operations						
Area	12.54	0.22	24.67	<0.01	0.02	0.02
Energy (natural gas)	0.09	1.58	1.01	0.01	0.12	0.12
Mobile	5.55	3.20	34.59	0.08	8.22	2.12
Project Overlapping Construction	46.17	10.55	31.77	0.08	7.07	3.19
Total Project (Interim Conditions)	**64.35**	**15.55**	**92.04**	**0.17**	**15.44**	**5.45**
SCAQMD Significance Thresholds	55	55	550	150	150	55
Significant Impact?	Yes	No	No	No	No	No

NOTES:

Totals may not add up exactly due to rounding in the modeling calculations. The maximum daily emissions from either the summer or winter scenario is shown. Detailed emissions calculations are provided in Appendix A of this Addendum to Final PEIR.

Conservatively, maximum construction emissions for the remaining Proposed Project construction phases from year 2032 to 2036 are presented.

SOURCE: ESA 2024

TABLE 3.3-7
MAXIMUM MITIGATED REGIONAL DAILY EMISSIONS FROM INTERIM OPERATIONS AND CONCURRENT CONSTRUCTION OF THE PROPOSED PROJECT

	Average Daily Emissions (pounds per day)					
Emission Source	**VOC**	**NO_X**	**CO**	**SO_2**	**PM10**	**PM2.5**
Project Interim Operations						
Area	9.43	0.00	0.00	0.00	0.00	0.00
Energy (natural gas)	0.09	1.58	1.01	0.01	0.12	0.12
Mobile	5.55	3.20	34.59	0.08	8.22	2.12
Project Overlapping Construction	41.37	10.55	31.77	0.08	7.07	3.19
Total Project (Interim Conditions)	**56.45**	**15.33**	**67.37**	**0.17**	**15.42**	**5.43**
SCAQMD Significance Thresholds	55	55	550	150	150	55
Significant Impact?	Yes	No	No	No	No	No

NOTES:

Totals may not add up exactly due to rounding in the modeling calculations. The maximum daily emissions from either the summer or winter scenario is shown. Detailed emissions calculations are provided in Appendix A of this Addendum to Final PEIR.

Conservatively, maximum construction emissions for the remaining Proposed Project construction phases from year 2032 to 2036 are presented.

SOURCE: ESA 2024

TABLE 3.3-8
MAXIMUM REGIONAL DAILY EMISSIONS FROM OPERATIONS OF THE PROPOSED PROJECT

	Average Daily Emissions (pounds per day)					
Emission Source	**VOC**	**NO_X**	**CO**	**SO_2**	**PM10**	**PM2.5**
Area	23.80	0.49	55.31	0.00	0.06	0.04
Energy (natural gas)	0.17	3.02	1.89	0.02	0.24	0.24
Mobile	7.73	4.28	48.21	0.12	12.64	3.25
Total	**31.70**	**7.79**	**105.41**	**0.14**	**12.94**	**3.53**
SCAQMD Significance Thresholds	55	55	None	None	150	55
Significant Impact?	No	No	No	No	No	No

NOTES:

Totals may not add up exactly due to rounding in the modeling calculations. The maximum daily emissions from either the summer or winter scenario is shown. Detailed emissions calculations are provided in Appendix A of this Addendum to Final PEIR.

SOURCE: ESA 2024

Cumulative

Cumulative development in the vicinity of the Proposed Project could generate daily construction emissions. The collective daily regional construction emissions from cumulative development could exceed the SCAQMD regional construction thresholds. Therefore, cumulative development could result in significant regional construction criteria pollutant emissions.

As identified above, the Proposed Project would also generate daily construction emissions. These regional daily construction emissions would not exceed SCAQMD thresholds. Although the Proposed Project construction emissions would not exceed the SCAQMD thresholds, these emissions would contribute to the regional construction criteria pollutant emissions from cumulative development. As a result, the Proposed Project's contribution to regional construction emissions from cumulative development would be cumulatively considerable.

Cumulative development in vicinity of the Proposed Project could generate daily operational emissions. The collective daily regional operational emissions from cumulative development could exceed the SCAQMD regional operational thresholds. Therefore, cumulative development could result in significant regional construction criteria pollutant emissions.

As identified above, the Proposed Project would also generate daily operational emissions. These regional daily operational emissions would exceed SCAQMD thresholds even with the implementation of Mitigation Measures AIR-2 and AIR-6. As the Proposed Project's operational emissions would exceed the SCAQMD thresholds, the Proposed Project's regional operational emissions would be cumulatively considerable and significant.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, Mitigation Measures AIR-2 through AIR-6 are required. The Specific Plan Program included the implementation of Tier 4 construction equipment and alternative technologies as Mitigation Measure AIR-1. Because the provisions of Mitigation Measure AIR-1 have been accepted by the Applicant and is currently a best management practice

and proposed as a sustainable feature of the Proposed Project, Mitigation Measure AIR-1 has been removed.

Conclusion

Unlike the Specific Plan Program, the Proposed Project would result in a less than significant Project-level impact associated with regional criteria pollutant emissions from construction with the implementation of mitigation measures. As with the Specific Plan Program, the Proposed Project would result in significant regional criteria pollutant emissions from operations after the implementation of mitigation measures. In addition, as with the Specific Plan Program, the Proposed Project's contribution to regional criteria pollutant emissions from construction and operations would be cumulatively considerable and significant with the implementation of mitigation measures. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact. Further, there is no new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Sensitive Receptors

Impact 3.3-3: The Specific Plan Program would result in less than significant and less than cumulatively considerable impacts with mitigation incorporated on sensitive receptors associated with substantial pollutant concentrations.

The Proposed Project would result in less than significant and less than cumulative considerable impacts on sensitive receptors associated with substantial pollutant concentrations.

Summary of Final PEIR Evaluation

Approved Plan Program Specific

The Final PEIR identified sensitive receptors located within and adjacent to the Specific Plan Program area that includes single-family and multi-family residences, as well as the schools, parks, and playgrounds.

Toxic Air Contaminants (TACs)

The Final PEIR identified that the Specific Plan Program construction activities would take place intermittently as various development projects occur within the Specific Plan Program area. Because development projects would be short-term and scattered throughout the Specific Plan Program area, sensitive receptors would be exposed for short-term limited time during nearby construction activities but would not be exposed to construction emissions over the entire construction period. As the exposure to receptors would be short-term and limited during infill development activities, diesel particular matter (DPM) impacts from construction activities would be considered less than significant.

Furthermore, the Final PEIR found that implementation of the Specific Plan Program would result in new land uses in the Specific Plan Program area consisting of residential and non-residential employment generating uses. These uses may utilize solvents and cleaners, and generate motor vehicle emissions, which are not anticipated to emit TAC emissions in appreciable quantities. Any non-residential use that would be a stationary source of TAC emissions would be subject to the rules and regulations of SCAQMD that would require that all sources that possess the potential to emit TACs be required to obtain permits from SCAQMD. The Final PEIR also included implementation of Mitigation Measures AIR-8, that requires the County to ensure that project approvals within the Specific Plan Program area require that any sensitive uses proposed to be located within 300 feet of the Metro tracks and within 500 feet of freeways shall be equipped with a filtered air supply system to maintain units under positive pressure when windows are closed. Mitigation Measure AIR-8 also requires disclosure of the necessary filtered air supply to the occupants (buyers and renters) within proximity of Metro tracks (within a 300-foot radius) and freeways (within a 500-foot radius). Thus, the Specific Plan Program operational TAC emissions impacts would be reduced to less than significant with mitigation.

Carbon Monoxide Hotspots

The Specific Plan Program determined that traffic volumes at affected intersections would not be increased to more than 24,000 vehicles per hour. Therefore, the Specific Plan Program would not result in localized CO impacts, and the impact would be less than significant.

Localized Significance Thresholds

Construction-related criteria pollutant emissions and potentially significant localized impacts were evaluated pursuant to the SCAQMD Final Localized Significant Thresholds Methodology. This methodology provides screening tables for one through five-acre project scenarios, depending on the amount of site disturbance during a day and proximity to sensitive receptors. The Final PEIR found that criteria pollutant emissions from construction would be reduced with the implementation of Mitigation Measures AIR-1 and AIR-2, but localized air quality construction emissions would still exceed the SCAQMD daily significance thresholds after the implementation of mitigation. Therefore, localized construction emission impacts would be significant and unavoidable.

Potentially significant localized impacts during operation of the Specific Plan Program were also evaluated in the Final PEIR. Based on the results of the analysis, the operation of the Specific Plan Program would not exceed SCAQMD localized significance thresholds, and therefore, impacts would be less than significant.

Cumulative

The Final PEIR identified cumulative development would generate daily localized construction and operational emissions. Because the SCAQMD neither recommends quantified analyses of cumulative construction or operational emissions nor provides methodologies or thresholds of significance to be used to assess cumulative construction and operational impacts, individual projects that exceed the SCAQMD recommended daily thresholds for project-specific impacts would cause a cumulatively considerable impact. It is reasonable to assume that there could be

individual projects within the SCAB that exceed the SCAQMD localized construction and operational thresholds. Therefore, cumulative development could result in significant localized construction and operational criteria pollutant emissions.

Because the Specific Plan Program would exceed localized construction criteria pollutant thresholds, the Specific Plan Program's contribution to cumulative impacts associated with localized construction criteria pollutant emissions would be cumulatively considerable. The implementation of Mitigation Measures AIR-1 and AIR-2 for construction emissions would reduce construction emissions, but these localized construction emissions would still exceed the thresholds after the implementation of the mitigation measures. As a result, the Specific Plan Program would remain cumulatively considerable for localized construction emissions.

The Specific Plan Program would not exceed the localized operational criteria pollutant thresholds. Therefore, the Specific Plan Program's contribution to cumulative impacts associated with localized operational criteria pollutant emissions would be less than cumulatively considerable.

Proposed Project-Specific

Toxic Air Contaminants (TACs)

Construction

The greatest potential for TAC emissions during construction would be related to DPM emissions associated with heavy-duty equipment during demolition, excavation and grading activities. Construction activities associated with the Proposed Project would be sporadic and transitory. Although Project construction would be temporary, construction impacts associated with TACs are addressed quantitatively in a refined health risk assessment (HRA). OEHHA is responsible for developing and revising guidelines for performing health risk assessments (HRAs) under the State's Air Toxics Hot Spots Program Risk Assessment (AB 2588) regulation. In March 2015, OEHHA adopted revised guidelines that update the previous guidance by incorporating advances in risk assessment with consideration of infants and children using Age Sensitivity Factors (ASF). The construction HRA was performed in accordance with the revised OEHHA Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments (OEHHA Guidance) (CALEPA 2015). The analysis incorporates the estimated construction emissions, as previously discussed, and dispersion modeling using the USEPA AERMOD model with meteorological data from the closest SCAQMD monitoring station.

The Proposed Project's health risk calculations were performed using a spreadsheet tool consistent with the OEHHA guidance, which incorporates the algorithms, equations, and a variable described above as well as in the OEHHA guidance and incorporates the results of the AERMOD dispersion model (see Appendix A of this Addendum to Final PEIR for additional information about construction assumption and health risk calculations). As discussed above under Impact 3.3-1, because the provisions of Mitigation Measure AIR-1 within the Specific Plan Final PEIR have been accepted by the Applicant and is currently a best management practice and proposed as a sustainable feature of the Proposed Project, the provisions, that include the use of Tier 4 construction equipment for each construction phase and the use of electric welders during building construction are considered part of the Proposed Project.

An HRA was conducted to evaluate the cancer risk at nearby sensitive receptors from the Proposed Project construction DPM emissions. The risks were evaluated at the sensitive receptors described above. The results are presented for the maximally exposed individual resident (MEIR), as this receptor would experience the highest risk, and the risk at all other sensitive receptors would be lower than that at the MEIR.

As stated above, the HRA follows the protocols outlined by the Office of Environmental Health Hazard Assessment (OEHHA). Consistent with guidelines and recommendations from these agencies, the HRA evaluated the estimated incremental increase in cancer risks from exposure to DPM emissions from heavy construction equipment and trucks. The OEHHA guidelines for HRAs provide age sensitivity factors to apply to the cancer risk calculation. These factors reflect the increased sensitivity of children to the effects of carcinogens. In addition, children have higher breathing rates, which increases the intake of pollutants. The modeling exposure assumptions for the residences conservatively assume a child in the age group from third-trimester fetus to 2 years of age, which is the age group most susceptible to DPM emissions from a cancer risk perspective, could be living at the residence near the Project site.

As shown in **Table 3.3-9,** *Maximum Health Risk Impacts for Off-Site Sensitive Receptors*, the maximum cancer risk and hazard index for sensitive receptors would be below the SCAQMD significance thresholds. Therefore, the impact related to health risks would be less than significant. The calculated cancer risk is estimated for outdoor exposure and assumes that sensitive receptors (residential uses) do not have mechanical filtration and that residential uses would have continuously open windows.

TABLE 3.3-9
MAXIMUM HEALTH RISK IMPACTS FOR OFF-SITE SENSITIVE RECEPTORS

Sensitive Receptor	Maximum Cancer Risk (# in one million)[a]	Hazard Index
Residential Land Use	8.7	0.02
Maximum Health Impact Thresholds	10	1.0
Exceeds Threshold?	No	No

NOTE:
a. The maximum cancer risk is based on the reasonable worst-case construction schedule for the Proposed Project's individual development areas described in Section 3.0.4 and modeled in Appendix A of this Addendum to Final PEIR.

SOURCE: ESA, 2024

The process of assessing health risks and impacts includes a degree of uncertainty, which is dependent on the availability of data and the extent to which assumptions are relied upon in cases where the data are incomplete or unknown. All HRAs rely upon scientific studies to reduce the level of uncertainty; however, it is not possible to completely eliminate uncertainty from the analysis. Where assumptions are used to substitute for incomplete or unknown data, it is standard practice in performing HRAs to err on the side of health protection to avoid underestimating or underreporting the risk to the public by assessing risk on the most sensitive populations, such as children and the elderly. As shown in Table 3.3-9, cancer risk for nearby sensitive receptors would remain below significance thresholds. These short-term emissions would not substantially

contribute to a significant construction health risk. No residual emissions and corresponding individual cancer risk are anticipated after Project construction. Thus, construction activities would not expose sensitive and commercial receptors to substantial toxic air contaminant concentrations, and construction-related health impacts would be less than significant.

Operations

The SCAQMD recommends that operational health risk assessments be conducted for substantial sources of operational DPM (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units) and has provided guidance for analyzing mobile source diesel emissions (SCAQMD 2003). The Proposed Project would not include any truck stop or warehouse distribution uses, and, as such, operations would generate only minor amounts of diesel emissions from mobile sources, such as delivery trucks and trash trucks. Furthermore, Project trucks would be required to comply with the applicable provisions of 13 CCR, Section 2025 (Truck and Bus regulation) to minimize and reduce PM10, PM2.5, and NO_X emissions from existing diesel trucks. Therefore, Proposed Project operation would not be considered a substantial source of DPM.

With respect to the use of consumer products and architectural coatings, the residential and open space uses associated with the Proposed Project would be expected to generate minimal emissions from these sources. The Proposed Project's land uses would not include installation of industrial-sized paint booths or require extensive use of commercial or household cleaning products. Furthermore, as shown in Table 3.3-8, the Proposed Project's full buildout operational VOC emissions would be below the adopted SCAQMD threshold. As a result, toxic or carcinogenic air pollutants are not expected to occur in any substantial amounts in conjunction with operation of the proposed land uses for the Proposed Project. Based on the uses expected, operation of the Proposed Project would not expose sensitive receptors to substantial TAC concentrations, and operational impacts would be less than significant.

In addition, the County of Los Angeles Department of Public Health includes a recommendation within the Air Quality Recommendations for Local Jurisdictions to include a buffer of at least 500 feet between freeways and sensitive land uses such as residences. Based on the Proposed Project Site Plan, the nearest residential use would be located outside the 500-foot buffer. Therefore, the location of the proposed residential uses would be in concurrence with CARB and County of Los Angeles Department of Health recommendations. The Proposed Project would also be built to meet and exceed California Title 24, Part 6 (Building Energy Efficiency Standards). As described in Section 2.7, the Project design would include HVAC systems that are equipped with MERV filters that reduce fine and ultra-fine particulate matter that can enter the proposed buildings. The rating of the MERV filters will be in compliance with the current version of Title 24 and the Los Angeles County Code at the time of building permit issuance. Furthermore, CARB's Air Quality and Land Use Handbook provides general guidance that can be applied to projects proposed in the vicinity of line source emissions, such as train tracks, where impacts from trains would be greatest within 300 feet of the tracks. However, the Proposed Project would not include the development of residential uses within 300 feet from any existing train tracks. Thus, the Proposed Project would not expose sensitive receptors to substantial TAC emissions from freeways or train tracks. Therefore, Mitigation Measure AIR-7 from the Final

PEIR that requires high-efficiency filters meeting minimum efficiency reporting values (MERV)13 for developments with sensitive uses within 500 feet of freeways and 300 feet from the Metro tracks would not apply to the Proposed Project because the Proposed Project does not have sensitive uses within the above identified distances. However, as stated above, the proposed buildings will include MERV filters with a rating that is in compliance with the current version of Title 24 and the Los Angeles County Code at the time of building permit issuance.

Carbon Monoxide Hotspots

As shown in the Proposed Project's Transportation Assessment Study, the Proposed Project would not result in intersection volumes from Project trips that would exceed the SCAQMD screening threshold of 24,000 vehicles per hour. Therefore, CO hotspot impacts would be less than significant.

As shown previously in Table 3.3-3, above, CO levels in the Proposed Project area are substantially below the federal and state standards. Maximum CO levels in recent years are 4.3 ppm (one-hour average) and 3.7 ppm (eight-hour average) compared to the thresholds of 20 ppm (one-hour average) and 9.0 ppm (eight-hour average). No exceedances of CO have been recorded at the SRA 12 monitoring stations in the last five years, as shown in Table 3.3-2, and the Air Basin is currently designated as a CO attainment area for both the CAAQS and NAAQS. Thus, it is not expected that CO levels at Project-impacted intersections would rise to the level of an exceedance of these standards.

Additionally, the SCAQMD conducted CO modeling for the 2003 AQMP for the four worst-case intersections in the Air Basin. These include: (a) Wilshire Boulevard and Veteran Avenue; (b) Sunset Boulevard and Highland Avenue; (c) La Cienega Boulevard and Century Boulevard; (d) Long Beach Boulevard and Imperial Highway. In the 2003 AQMP, the SCAQMD notes that the intersection of Wilshire Boulevard and Veteran Avenue is the most congested intersection in Los Angeles County, with an average daily traffic volume of about 100,000 vehicles per day. This intersection is located near the on- and off-ramps to Interstate 405 in West Los Angeles. The evidence provided in Table 4-10 of Appendix V of the 2003 AQMP shows that the peak modeled CO concentration due to vehicle emissions at these four intersections was 4.6 ppm (one-hour average) and 3.2 (eight-hour average) at Wilshire Boulevard and Veteran Avenue.

Based on the Proposed Project's Transportation Assessment Study, the street segment analysis shows that traffic volumes of all studied segments do not exceed 32,840 average daily trips (Raju Associates, Inc 2023). As a result, CO concentrations are expected to be approximately 5.8 ppm (one-hour average) and 4.8 ppm (eight-hour average) or less, inclusive of background CO concentrations, which would not exceed the thresholds.[9] Total traffic volumes at the maximum impacted intersection would likely have to increase by five times or more to contribute to a CO hotspot given that vehicles operating today have reduced CO emissions as compared to vehicles operating in year 2003 when the SCAQMD conducted the AQMP attainment demonstration modeling. Thus, this comparison demonstrates that the Proposed Project would not contribute

[9] Maximum background CO concentrations (2020-2022) in Table 3.3-3 were used in this calculation.

considerably to the formation of CO hotspots, and no further CO analysis is required. The Proposed Project would result in less than significant impacts with respect to CO hotspots.

Localized Significance Thresholds

For the Proposed Project, construction and operational criteria pollutant emissions and potentially significant localized impacts were evaluated pursuant to the SCAQMD Final Localized Significant Thresholds Methodology, as with the Specific Plan Program. Based on the results of the analysis, as shown in **Table 3.3-10,** *Estimated Maximum Localized Construction Emissions (pounds per day),* and **Table 3.3-11,** *Estimated Maximum Localized Operational Emissions (pounds per day),* below, SCAQMD localized significance thresholds would not be exceeded for construction, which includes the incorporation of the construction equipment best management practice and sustainable features as discussed in Section 2.4.8 and during operational activities.[10]

TABLE 3.3-10
ESTIMATED MAXIMUM LOCALIZED CONSTRUCTION EMISSIONS (POUNDS PER DAY)[a]

Construction Year	NO_x	CO	PM10[b]	PM2.5[b]
2025	5.71	32.41	4.17	1.64
2026	2.64	18.62	3.89	2.02
2027	4.17	18.62	0.12	0.11
2028	4.97	24.03	4.93	2.42
2029	6.41	19.10	0.12	0.12
2030	2.64	18.62	3.89	2.02
2031	4.17	18.62	0.12	0.11
2032	8.80	28.48	5.63	2.76
2033	8.79	24.23	4.76	2.39
2034	5.64	20.30	0.09	0.09
2035	4.96	24.03	4.92	2.42
2036	4.96	19.10	0.09	0.09
Maximum Localized (On-Site) Construction Emissions	8.80	32.41	5.63	2.76
SCAQMD Screening Numeric Indicator[c]	**98.0**	**630**	**13**	**7**
Exceed Screening Numeric Indicator?	No	No	No	No

NOTES:

a. Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix A of this Addendum to Final PEIR.
b. Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.
c. The SCAQMD LSTs are based on Source Receptor Area 12 for a 5-acre site with sensitive receptors conservatively assumed to be located 25 meters from the Proposed Project.

SOURCE: ESA 2024

10 As shown in Table 3.3-10 and 3.3-11, maximum localized construction and operational emissions would be below the SCAQMD significance thresholds without mitigation, but would be further reduced with the implementation of Mitigation Measure AIR-2 through AIR-7.

TABLE 3.3-11
ESTIMATED MAXIMUM LOCALIZED OPERATIONAL EMISSIONS (POUNDS PER DAY)[a]

Source	NO_X	CO	PM10[b]	PM2.5[b]
Area	0.49	55.31	0.06	0.04
Energy	3.02	1.89	0.24	0.24
Total (On-Site) Emissions	**3.51**	**57.20**	**0.29**	**0.28**
SCAQMD Screening Numeric Indicator[c]	**98.0**	**630.0**	**4.0**	**2.0**
Exceed Screening Numeric Indicator?	No	No	No	No

NOTES:

a. Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix A of this Addendum to Final PEIR.
b. Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.
c. The SCAQMD LSTs are based on Source Receptor Area 12 for a 5-acre site with sensitive receptors conservatively assumed to be located 25 meters from the Proposed Project site.

SOURCE: ESA 2024

Cumulative

Cumulative development in the vicinity of the Proposed Project could generate TACs emissions during construction and operations that could expose sensitive receptors to DPM emission levels from sources such as: construction equipment, freeways, and trains that could result in potentially significant cumulative impacts.

As identified above, the increase in construction-related health risks from the Proposed Project are less than SCAQMD significance thresholds and thus not a considerable contribution to the cumulative impact. Therefore, the Proposed Project's health risk impacts during construction activities would be less than cumulatively considerable. In addition, as discussed above, the Proposed Project would not include any truck stop or warehouse distribution uses, and, as such, operations would generate only minor amounts of diesel emissions from mobile sources, such as delivery trucks and trash trucks, and the Proposed Project land uses would not include installation of industrial-sized paint booths or require extensive use of commercial or household cleaning product, thus the Proposed Project's health risk impacts during operational activities would be less than significant. Based on the above, the Proposed Project's contributions to cumulative operational health risk impacts would be less than cumulatively considerable.

Cumulative development in vicinity of the Proposed Project could generate daily construction emissions. The collective daily localized construction emissions from cumulative development could exceed the SCAQMD localized construction thresholds. Therefore, cumulative development could result in significant localized construction criteria pollutant emissions.

As identified above, the Proposed Project would also generate daily construction emissions. These localized daily construction emissions would not exceed SCAQMD thresholds. Therefore, the Proposed Project's localized construction emissions impacts would be less than cumulatively considerable. Because the Proposed Project would not exceed the localized operational criteria pollutant thresholds, the Proposed Project's contribution to cumulative impacts associated with localized operational criteria pollutant emissions would be less than cumulatively considerable.

Applicable Mitigation Measures for the Proposed Project

Unlike the Specific Plan Program, the Proposed Project would not require the implementation of mitigation measures. The Specific Plan Program required the implementation of Mitigation Measures AIR-1 and AIR-2 due to significant localized construction emissions, but the Proposed Project would result in less than significant localized construction emissions. The Specific Plan Program would also require the implementation of Mitigation Measure AIR-8 due to potential significant TAC impacts from nearby Metro tracks and I-105, but the Proposed Project would result in less than significant TAC impacts because the proposed onsite residential uses are not within close proximity of the Metro tracks or I-105. Therefore, Mitigation Measure AIR-8 is removed as a mitigation measure.

> **Mitigation Measure AIR-8 (Removed):** ~~The County shall ensure that project approvals within the Specific Plan area require that any sensitive uses proposed to be located within 300 feet of the Metro tracks and within 500 feet of freeways shall be equipped with a filtered air supply system to maintain units under positive pressure when windows are closed. The ventilation system, whether a central HVAC (heating, ventilation and air conditioning) or a unit-by-unit filtration system, shall include high-efficiency filters meeting minimum efficiency reporting value (MERV) 13, per American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) Standard 52.2 (equivalent to approximately ASHRAE Standard 52.1 Dust Spot 85%). The efficiency rating of the filtration system shall be determined based on a health risk assessment conducted for the proposed development, such that cancer and non-cancer risks are reduced to a 10 in one million increase in cancer risk, and less than 1 for non-cancer risk, unless thresholds are superseded by more current SCAQMD threshold. Air intake systems for HVAC shall be placed based on exposure modeling to minimize roadway air pollution sources. The ventilation system shall be designed by an engineer certified by ASHRAE, who shall provide a written report documenting that the system offers the best available technology to minimize outdoor to indoor transmission of air pollution. Disclosure to the occupants (buyers and renters) shall be required regarding the proximity of Metro tracks (within a 300-foot radius) and freeways (within a 500-foot radius), the occurrence of diesel emissions form Metro trains and freeways heavy truck traffic), and the potential increased cancer and non-cancer risks associated with the development location.~~

Conclusion

Unlike the Specific Plan Program, the Proposed Project would result in less than significant localized construction emission and TAC emissions and not require mitigation measures. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact. Further, there is no new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Other Emissions

Impact 3.3-4: The Specific Plan Program and Proposed Project would result in less than significant impacts and would not contribute to cumulative impacts on other emissions, such as those leading to odors, adversely affecting a substantial number of people.

Summary of Final PEIR Evaluation

Approved Plan Program Specific

The Final PEIR identified that the Specific Plan Program does not include any land uses that have potential odor issues where the SCAQMD Air Quality Handbook identifies the following uses as having potential odor issues: wastewater treatment plants, food processing plants, agricultural uses, chemical plants, composting, refineries, landfills, dairies, and fiberglass moldings. The Specific Plan Program includes mixed use commercial and residential development within the Specific Plan Program area, which do not involve the types of uses that would emit objectionable odors affecting a substantial number of people. In addition, odors generated by new and existing non-residential land uses in the Specific Plan Program area are required to be in compliance with SCAQMD Rule 402 to prevent odor nuisances on sensitive land uses.

The Final PEIR also determined that during construction of future projects allowed under the Specific Plan Program, emissions from construction equipment, such as diesel exhaust, and volatile organic compounds from architectural coatings and paving activities may generate odors. However, these odors would be limited and temporary; and thus, are not expected to affect a substantial number of people. Therefore, impacts relating to both operational and construction activity odors would be less than significant.

Cumulative

The Final PEIR did not address cumulative odor impacts. However, based on the Specific Plan Program's land uses not being associated with odor issues and compliance with applicable SCAQMD regulations related to odor, the Specific Plan Program's odor impacts would be less than cumulatively considerable.

Proposed Project Evaluation

Proposed Project-Specific

Potential sources that may emit odors during construction activities include the use of architectural coatings and solvents. SCAQMD Rule 1113 limits the allowable amount of VOCs from architectural coatings and solvents. Since compliance with SCAQMD Rules governing these compounds is mandatory, no construction activities or materials are proposed that would create objectionable odors adversely affecting a substantial number of people. Therefore, less than significant impacts would occur.

The Proposed Project also does not include any land uses that have potential odor issues as identified in the SCAQMD Air Quality Handbook. Additionally, the Proposed Project and its uses would also be required to comply with SCAQMD Rule 402 – Nuisance. Therefore, potential odor impacts would be less than significant.

Cumulative

Based on the Proposed Project's land uses not being associated with odor issues and compliance with applicable SCAQMD regulations related to odor, the Proposed Project's odor impacts would be less than cumulatively considerable.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project would result in less than significant impacts associated with odors or other emissions. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact. Further, there is no new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

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3.4 Biological Resources

3.4.1 Introduction

This section addresses current biological resources conditions, and the potential of the Proposed Project to result in impacts to special status plant and wildlife species, sensitive natural communities, wetlands, movement of species, conflict with local policies or ordinances protecting biological resources and conflicts with an adopted conservation plan. This section includes an update of the environmental setting on and in the vicinity of the Project site and identifies any applicable changes to the biological resources conditions that may have occurred since the certification of the Final PEIR. In addition, a brief summary of the regulatory setting included in the Final PEIR and any substantive revisions to the regulatory setting that has occurred since the certification of the Final PEIR. This section also includes the thresholds of significance and a brief summary of the impacts associated with biological resources and mitigation measures addressed in the Final PEIR as well as the potential biological resources impacts associated with the Proposed Project. Finally, this section provides a conclusion of whether (1) the Proposed Project includes substantial changes that would require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact related to biological resources; (2) substantial changes in the circumstances under which the Proposed Project is undertaken would require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact related to biological resources; or (3) new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3) exist related to biological resources.

3.4.2 Environmental Setting

The Initial Study/Notice of Preparation and the Final PEIR identified that there were no state or federal candidate, sensitive, or special-status species have been identified within or in the vicinity of the Specific Plan area by the California Natural Diversity Database (CNDDB). The Specific Plan Program provides for infill development within an already highly disturbed urban environment.

Based on a current review of the CNDDB within the BIOS Viewer (CDFW, 2024), there are no state or federal candidate, sensitive, or special-status species that have been identified within the Project site. The nearest potential past occurrence of a special-status species is the southern tarplant that encompasses an approximately two-mile diameter area located north of I-105; however, the most recent date that the southern tarplant was observed in the area north of I-105 was in the 1930s.

The Project site was previously developed as an elementary school and included school buildings, asphalt play areas and lawn area. A charter school was added to the northeast corner of the Project site. In 2020, the buildings associated with the charter school were removed while the buildings associated with the elementary school were removed in 2023. The Project site includes non-native grasses and weeds. Currently, there are four trees on the Project site. Two ash trees are

located on the west side of the Project site adjacent to Compton Avenue, one Mexican fan palm tree is located north of E. 118th Street, and one Peruvian Pepper tree is located along the current property line with the I-105 right-of-way. The Project site does not contain any sensitive habitat areas.

3.4.3 Regulatory Setting

Federal Laws, Regulations, and Policies

Federal Endangered Species Act

The USFWS and National Marine Fisheries Service (NMFS) are the designated federal agencies responsible for administering the FESA. The FESA defines species as "endangered" and "threatened" and provides regulatory protection for any species thus designated. FESA Section 9 prohibits the "take" of species listed by USFWS as threatened or endangered. As defined in the FESA, *taking* means "… to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect or attempt to engage in such conduct." Recognizing that take cannot always be avoided, FESA Section 10(a) includes provisions for takings that are incidental to, but not the purpose of, otherwise lawful activities.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) (16 USC 703 et seq.) domestically implements a series of international treaties that provide for international migratory bird protection. The MBTA authorizes the Secretary of the Interior to regulate the taking of migratory birds; the act provides that it shall be unlawful, except as permitted by regulations, "to pursue, take, or kill any migratory bird, or any part, nest or egg of any such bird" (16 USC 703).

State Laws, Regulations, and Policies

California Endangered Species Act

The California Endangered Species Act (CESA) (California Legislative Information, 2024a) establishes the policy of the state to conserve, protect, restore, and enhance threatened or endangered species and their habitats. The CESA mandates that state agencies should not approve projects that would jeopardize the continued existence of threatened or endangered species if reasonable and prudent alternatives are available that would avoid jeopardy. There are no state agency consultation procedures under the CESA. For projects that would affect a listed species under both the CESA and the FESA, compliance with the FESA would satisfy the CESA if CDFW determines that the federal incidental take authorization is "consistent" with the CESA under Fish and Game Code Section 2080.1. For projects that would result in take of a species listed under the CESA only, an incidental take permit is required under Section 2081(b).

California Fish and Game Code

Sections 1600–1616. Under these sections of the Fish and Game Code, a project proponent is required to notify CDFW prior to any project that would divert, obstruct, or change the natural flow, bed, channel, or bank of any river, stream, or lake. Pursuant to the code, a "stream" is defined as a body of water that flows at least periodically, or intermittently, through a bed or channel having banks and supporting fish or other aquatic life. Based on this definition, a

watercourse with surface or subsurface flows that supports or has supported riparian vegetation is a stream and is subject to CDFW jurisdiction. Altered or artificial watercourses valuable to fish and wildlife are subject to CDFW jurisdiction. CDFW also has jurisdiction over dry washes that carry water during storm events (California Legislative Information, 2024b).

Sections 3503, 3503.5, 3513, and 3800. Under these sections, a project proponent is not allowed to conduct activities that would result in the taking, possessing, or destroying of any birds of prey or their nests or eggs; the taking or possessing of any migratory nongame bird as designated in the MBTA; the taking, possessing, or needlessly destroying of the nest or eggs of any bird; or the taking of any nongame bird pursuant to Fish and Game Code Section 3800 (California Legislative Information, 2024c).

3.4.4 Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines and the County of Los Angeles Environmental Checklist Form, the project could have a significant impact related to biological resources if it would:

- Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service (see Impact 3.4-1, below).
- Have a substantial adverse effect on any sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, non-jurisdictional wetlands) identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service (see Impact 3.4-2, below).
- Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands and drainages) or waters of the U.S. or California, as defined by Section 404 of the Federal Clean Water Act or California Fish and Game Code Section 1600, et seq. through direct removal, filling, hydrological interruption, or other means (see Impact 3.4-3, below).
- 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 (see Impact 3.4-4, below).
- Convert oak woodlands (as defined by the state, oak woodlands are oak stands with greater than 10% canopy cover with oaks at least 5 inch in diameter measured at 4.5 feet above mean natural grade) or other unique native woodlands (juniper, Joshua, southern California black walnut, etc.) (see Impact 3.4-5).
- Conflict with any local policies or ordinances protecting biological resources, including Wildflower Reserve Areas (L.A. County Code, Title 12, Ch. 12.36), the Los Angeles County Oak Tree Ordinance (L.A. County Code, Title 22, Ch. 22.174), the Significant Ecological Areas (SEAs) (L.A. County Code, Title 22, Ch. 102), and Sensitive Environmental Resource Areas (SERAs) (L.A. County Code, Title 22, Ch. 22.44) (see Impact 3.4-6, below).

- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved state, regional or local habitat conservation plan (see Impact 3.4-7, below).

3.4.5 Impact Analysis

Effect on Species

Impact 3.4-1: The Specific Plan Program and Proposed Project would not impact or contribute to a cumulative impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Initial Study/Notice of Preparation and Final PEIR identified that there were no candidate, sensitive, or special-status species that have been identified within or in the vicinity of the Specific Plan Program area by the California Natural Diversity Database (CNDDB) (CDFW, 2015). The Specific Plan Program provides for infill development within an already highly disturbed urban environment. This development would not result in any direct impacts to special-status species or result in any habitat modifications that could indirectly result in a substantial adverse effect on any special-status species. Therefore, the Specific Plan Program would not result in impacts on species identified as candidate, sensitive, or special-status.

Cumulative

The Final PEIR did not address cumulative impacts on plant and wildlife species because the Specific Plan Program would result in no impact on species identified as candidate, sensitive, or special-status species. Because the Specific Plan Program would not result in an impact on species identified as candidate, sensitive, or special-status, the Specific Plan Program would not contribute to a cumulative impacts related to plant and wildlife species.

Proposed Project Evaluation

Proposed Project-Specific

As with the Specific Plan Program site, the Project site is located within a highly disturbed urban environment. Based on a current review of the CNDDB (CDFW, 2024), the Project site does not contain state or federal candidate, sensitive, or special-status species. Therefore, the implementation of the Proposed Project would not impact state or federal candidate, sensitive, or special-status species.

Cumulative

Cumulative development in the vicinity of the Project site is located within a highly disturbed urban environment and would not impact state or federal candidate, sensitive, or special-status species. Because the Proposed Project would not impact state or federal candidate, sensitive, or special-status species, the Proposed Project would not contribute to a cumulative impact on state or federal candidate, sensitive, or special-status plant or wildlife species.

Applicable Mitigation Measures for Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project would not impact state or federal candidate, sensitive, or special-status plant or wildlife species. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Sensitive Natural Communities

Impact 3.4-2: The Specific Plan Program and Proposed Project would not impact or contribute to a cumulative impact on any sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, non-jurisdictional wetlands) identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Initial Study/Notice of Preparation and Final PEIR identified that the Specific Plan Program area did not contain any riparian habitat or other sensitive natural community. The Specific Plan Program area is located in an upland area that contains an appreciable amount of impervious surfaces (i.e., asphalt and cemented streets and parking lots and buildings) and nonnative ornamental trees, shrubs, and ground cover and, therefore, riparian habitat is not present. The Specific Plan Program would involve infill development within an already highly disturbed urban environment and would not involve any changes or alterations to any riparian habitat or other sensitive natural community. Therefore, the Specific Plan Program would not result in impacts on riparian habitat or other sensitive natural community.

Cumulative

The Final PEIR did not address cumulative impacts on riparian habitat or other sensitive natural community because the Specific Plan Program area does not contain riparian habitat or other sensitive natural community. Because the Specific Plan Program would not result in an impact on riparian habitat or other sensitive natural community, the Specific Plan Program would not contribute to cumulative impacts related to sensitive natural communities.

Proposed Project Evaluation

Proposed Project-Specific

As with the Specific Plan Program site, the Project site is located within a highly disturbed urban environment and does not contain riparian habitat or other sensitive natural community.

Therefore, the implementation of the Proposed Project would not impact sensitive natural communities.

Cumulative

Cumulative development in the vicinity of the Project site is located within a highly disturbed urban environment and would not impact riparian habitat or other sensitive natural community due to the absence of sensitive natural communities in the Project vicinity. Because the Proposed Project would not impact sensitive natural communities, the Proposed Project would not contribute to a cumulative impact on sensitive natural communities.

Applicable Mitigation Measures for Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project would not impact sensitive natural communities. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Protected Wetlands

Impact 3.4-3: The Specific Plan Program and Proposed Project would not impact or contribute to a cumulative impact on State or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands and drainages) or waters of the U.S. or California, as defined by Section 404 of the Federal Clean Water Act or California Fish and Game Code Section 1600, et seq. through direct removal, filling, hydrological interruption, or other means.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Initial Study/Notice of Preparation and Final PEIR identified that the Specific Plan Program area is a highly disturbed urban environment, and no portion of the area contains the proper vegetation (i.e., a preponderance of hydrophytes or "water-loving" plants), soils (i.e., hydric or waterlogged soils), and hydrologic conditions (i.e., inundated either permanently or periodically or saturated during the growing season of the prevalent vegetation) to be defined a wetland according to the U.S. Army Corps of Engineers' (USACE) Wetlands Delineation Manual (USACE, 1987). Compton Creek (located approximately 2 miles west of the Specific Plan Program area) is a concrete-lined and channelized wash. Overall, because the Specific Plan Program area does not contain nor is located in close proximity to a wetland, the Specific Plan Program would not have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (CWA) (including, but not limited to, marsh, vernal pool,

coastal, etc.) through direct removal, filling, hydrological interruption, or other means. Therefore, no impacts would occur.

Cumulative

The Final PEIR did not address cumulative impacts on State or federally protected wetlands or waters of the U.S. or State because the Specific Plan Program area does not these resources. Because the Specific Plan Program would not result in an impact on State or federally protected wetlands or waters of the U.S. or State, the Specific Plan Program would not contribute to cumulative impacts related to protected wetlands or waters.

Proposed Project Evaluation

Proposed Project-Specific

As with the Specific Plan Program area, the Project site is located within a highly disturbed urban environment and does not contain State or federally protected wetlands or waters of the U.S. or State. Therefore, the implementation of the Proposed Project would not impact protected wetlands or waters.

Cumulative

Cumulative development in the vicinity of the Project site is located within a highly disturbed urban environment and would not impact State or federally protected wetlands or waters of the U.S. or State. Because the Proposed Project would not impact State or federally protected wetlands or waters of the U.S. or State, the Proposed Project would not contribute to a cumulative impact on protected wetlands or waters.

Applicable Mitigation Measures for Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project would not impact protected wetlands or waters. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Wildlife Corridors and Nursery Sites

Impact 3.4-4: The Specific Plan Program and Proposed Project would not impact and would not contribute to cumulative impacts on the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Initial Study/Notice of Preparation and Final PEIR identified that the Specific Plan Program area is within a fully developed urban area. It is sufficiently removed from habitat areas such that it could not provide for the movement of any native resident or migratory fish or wildlife species, nor could it provide an established native resident or migratory wildlife corridor or contain native wildlife nursery sites. Therefore, no impacts would result from implementation of the Specific Plan Program.

Cumulative

The Final PEIR did not address cumulative impacts on the movement of any native resident or migratory fish or wildlife species because the Specific Plan Program area does not provide an established native resident or migratory wildlife corridor or contain native wildlife nursery sites. Because the Specific Plan Program would not result in an impact on established native resident or migratory wildlife corridor or contain native wildlife nursery sites, the Specific Plan Program would not contribute to cumulative impacts related to wildlife corridors and nursery sites.

Proposed Project Evaluation

Proposed Project-Specific

As with the Specific Plan Program, the Proposed Project is within a fully developed urban area. The Project site does not contain habitat areas for the movement of native resident or migratory fish or wildlife species. As required for any construction activities within Los Angeles County and throughout California, compliance with the Migratory Bird Treaty Act and the California Fish and Game Code to protect nests and eggs is a regulatory requirement. Compliance would occur through avoidance of the nesting bird season or conducting nesting bird surveys during the nesting season, and if active nests are present, adequate buffers between the nests and construction activities are provided to ensure regulatory compliance. Therefore, the implementation of the Proposed Project would not impact the movement of native resident or migratory fish or wildlife species.

Cumulative

As with the Specific Plan Program, the Proposed Project would not impact the movement of native resident or migratory fish or wildlife species. Because the Proposed Project would not impact the movement of native resident or migratory fish or wildlife species, the Proposed Project would not contribute to a cumulative impact on the movement of native resident or migratory fish or wildlife species.

Applicable Mitigation Measures for Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project would not impact the movement of native resident or migratory fish or wildlife species. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Oak Woodlands or Unique Native Woodlands

Impact 3.4-5: The Specific Plan Program and Proposed Project would not impact and would not contribute to cumulative impacts on oak woodlands (as defined by the state, oak woodlands are oak stands with greater than 10% canopy cover with oaks at least 5 inch in diameter measured at 4.5 feet above mean natural grade) or other unique native woodlands (juniper, Joshua, southern California black walnut, etc.).

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Initial Study/Notice of Preparation and Final PEIR identified that the Specific Plan Program area does not contain oak woodlands or other unique native trees. Therefore, the Specific Plan Program would not impact oak woodlands or other unique native trees.

Cumulative

The Final PEIR did not address cumulative impacts on oak woodlands or other unique native trees because the Specific Plan Program area did not contain any oak woodlands or other unique native trees.

Proposed Project Evaluation

Proposed Project-Specific

As with the Specific Plan Program area, the Project site does not contain any oak woodlands or other unique native trees. Therefore, the implementation of the Proposed Project would not impact any oak woodlands or other unique native trees.

Cumulative

Cumulative development in the vicinity of the Project site is located within a highly disturbed urban environment and does not contain any oak woodlands or other unique native trees. Because the Proposed Project would not impact any oak woodlands or other unique native trees, the Proposed Project would not contribute to a cumulative impact on any oak woodlands or other unique native trees.

Applicable Mitigation Measures for Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project would not impact any oak woodlands or other unique native trees. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Local Policies or Ordinances Protecting Biological Resources

Impact 3.4-6: The Specific Plan Program and Proposed Project would not impact and would not contribute to cumulative impacts on any local policies or ordinances protecting biological resources, including Wildflower Reserve Areas (L.A. County Code, Title 12, Ch. 12.36), the Los Angeles County Oak Tree Ordinance (L.A. County Code, Title 22, Ch. 22.174), the Significant Ecological Areas (SEAs) (L.A. County Code, Title 22, Ch. 102), and Sensitive Environmental Resource Areas (SERAs) (L.A. County Code, Title 22, Ch. 22.44).

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Initial Study/Notice of Preparation and Final PEIR identified that the Specific Plan Program would not conflict with local policies protecting biological resources because the Specific Plan Program area does not contain biological resources that are protected by local policies or ordinances. The Specific Plan Program area does not contain Wildflower Reserve Areas, Oak Trees, Significant Ecological Areas or Sensitive Environmental Resource Areas. Therefore, the Specific Plan Program would not conflict with local plans or policies protecting biological resources, and no impacts on biological resources that are protected by local policies or ordinances would occur.

Cumulative

The Final PEIR did not address cumulative impacts on biological resources that are protected by local policies or ordinances because the Specific Plan Program area does not contain biological resources that are protected by local policies or ordinances. These resources include Wildflower Reserve Areas, Oak Trees, Significant Ecological Areas and Sensitive Environmental Resource Areas.

Proposed Project Evaluation

Proposed Project-Specific

As with the Specific Plan Program area, the Project site does not contain biological resources that are protected by local policies or ordinances such as Wildflower Reserve Areas, Oak Trees, Significant Ecological Areas or Sensitive Environmental Resource Areas. Therefore, the

implementation of the Proposed Project would not impact biological resources that are protected by local policies or ordinances.

Cumulative

Cumulative development in the vicinity of the Project site is located within a highly disturbed urban environment and does not contain biological resources that are protected by local policies or ordinances. Because the Proposed Project would not impact biological resources that are protected by local policies or ordinances, the Proposed Project would not contribute to a cumulative impact on biological resources that are protected by local policies or ordinances such as Wildflower Reserve Areas, Oak Trees, Significant Ecological Areas or Sensitive Environmental Resource Areas.

Applicable Mitigation Measures for Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project would not impact biological resources that are protected by local policies or ordinances. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Habitat Conservation Plan

Impact 3.4-7: The Specific Plan Program and Proposed Project would not impact and would not contribute to cumulative impacts on biological resources covered by provisions within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved state, regional or local habitat conservation plan.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Initial Study/Notice of Preparation and Final PEIR identified that the Specific Plan Program area is not located within or near a Habitat Conservation Plan, Natural Community Conservation Plan or any other approved local, regional, or state habitat conservation plan. Therefore, the Specific Plan Program would have no impact on a habitat conservation plan.

Cumulative

The Final PEIR did not address cumulative impacts associated with conservation plans since the Specific Plan Program would not impact existing habitat conservation plans.

Proposed Project Evaluation

Proposed Project-Specific

As with the Specific Plan Program, the Proposed Project would not impact an existing adopted habitat conservation plan because there are no existing habitat conservation plans that covers the Project site or the area surrounding the Project site.

Cumulative

Cumulative development areas in the vicinity of the Project site are located within a highly disturbed urban environment and are not located within areas with existing habitat conservation plans. Because the Proposed Project would not impact existing habitat conservation plans, the Proposed Project would not contribute to a cumulative impact on habitat conservation plans.

Applicable Mitigation Measures for Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project would not impact existing habitat conservation plans. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

3.4.6 References

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California Legislative Information. 2024a. Fish and Game Code Section 2050 et seq. Available at: https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=FGC&division=3.&title=&part=&chapter=1.5.&article=1. Accessed on August 7, 2024.

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California Legislative Information. 2024b. Fish and Game Code Sections 3500-3863. Available at: https://leginfo.legislature.ca.gov/faces/codes_displayexpandedbranch.xhtml?tocCode=FGC&division=4.&title=&part=2.&chapter=&article=. Accessed on August 7, 2024.

3.5 Cultural Resources

3.5.1 Introduction

This section addresses cultural resources (built environment, archaeological resources, and human remains), as well as paleontological resources, and the potential of the Proposed Project to impact those resources. This section includes a brief summary of the environmental setting included in the Final PEIR, and the identification of any applicable changes to the cultural resource setting that may have occurred since the certification of the Final PEIR. In addition, a brief summary of the regulatory setting and any substantive revisions to the regulatory setting that has occurred since the certification of the Final PEIR. This section also includes the thresholds of significance and a brief summary of the cultural resource impacts and mitigation measures addressed in the Final PEIR as well as the potential cultural resource impacts associated with the Proposed Project. Finally, this section provides a conclusion of whether (1) the Proposed Project includes substantial changes that would require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact related to cultural resources; (2) substantial changes in the circumstances under which the Proposed Project is undertaken would require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact related to cultural resources; or (3) new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3) exist related to cultural resources.

An assessment of cultural resources for the Proposed Project is based on the Cultural Resources Assessment Report for the Proposed Project prepared by Environmental Science Associates in August 2024. The Assessment is located in Appendix B of this Addendum to Final PEIR. In addition, a paleontological resources database search was conducted by the Natural History Museum of Los Angeles County (LACM) on July 16, 2023 and is located in Appendix C of this Addendum to Final PEIR.

3.5.2 Environmental Setting

Ethnographic and Historic Setting

The Specific Plan Program area is approximately 312 acres and is located within the northwestern portion of the Willowbrook community. The Final PEIR identified that the Specific Plan Program area is located within the territory of the native population known as the Gabrielino. The Gabrielino occupied a diverse area that included watersheds of the Los Angeles, San Gabriel, and Santa Ana rivers, the Los Angeles basin, and the islands of San Clemente, San Nicolas, and Santa Catalina. In the late 1800s, Willowbrook was an agricultural site where residents grew fruits and vegetables, ran hogs, and raised chickens. In approximately 1928, Lincoln Elementary School was initially constructed on a portion of the Project site and then additional school buildings were added to the Project site into the 1980s. Between 1966 and 1971, the Martin Luther King, Jr. Medical Center Campus was developed south of the Project site. In 1971, the Martin Luther King, Jr. General Hospital and Charles R. Drew Postgraduate Medical School entered into a contract to

provide health care and education services. In 2009, the school buildings located on the northeastern portion of the Project site that were being used by a charter school were renamed to Barack Obama Charter School. Both Lincoln Elementary School and Barack Obama Chater School were closed in 2017 and relocated from the Project site. The buildings associated with Barack Obama Charter School were removed in 2020, the buildings associated with Lincoln Elementary School were removed in 2023.

Archival Research

A records search for the 300-acre Specific Plan Program area was conducted in July 2015, at the California Historical Resources Information System (CHRIS) South Central Coastal Information Center (SCCIC) located at the California State University, Fullerton. The records search included a review of all recorded resources, including archaeological sites and built environment resources, within a 0.50-mile radius of the Specific Plan Program area, as well as a review of cultural resource reports on file.

The records search indicated that 35 cultural resources studies had been conducted within a 0.50-mile radius of the Specific Plan Program area. Of these 35 studies, 10 studies included a pedestrian survey of portions of the Program area, and one included archival research of a portion of the Program area.

On June 28, 2023, a records search for the Project site was conducted at the SCCIC. The records search included a review of all recorded cultural resources and previous studies within the Project site and a 0.50-mile radius. The records search results indicate that 18 cultural resources studies have been conducted within a 0.50-mile radius of the Project site. Approximately 15 percent of the 0.50-mile records search radius has been included in previous cultural resources surveys. Of the 18 previous studies, one (LA-00078) overlaps portions of the Project site. Study of LA-00078 consisted of an *Evaluation of the Archaeological Resources and Potential Impact of the proposed Construction of Route 105 Freeway from El Segundo to Norwalk* and included a records search and a windshield survey, which yielded negative results. This study did not include an on-foot pedestrian survey. Based on the records search, no archaeological resources have been recorded within the Project site or 0.50-mile radius.

The records search results indicate that one California Registered Historical Landmark (P-19-187085) has been previously recorded within the 0.50-mile radius. Resource P-19-187085 is the Mojave Road listed as California Historical Landmark (CHL) 963. The Mojave Road is a trail/road that ran from the Drum Barracks at Wilmington, followed north to Downtown Los Angeles, east toward San Bernardino, north over the Cajon Pass to the Mojave River, and across the Mojave Desert to the Nevada State Line. The resource has been described as unique for its significance as an Indian trail, a federal government supply, a freight and emigrant wagon route, and a recreational trail.

In addition, a Cultural Resources Technical Report prepared in 2010 as part of the Martin Luther King, Jr. Medical Center Campus Redevelopment Project evaluated 21 buildings as potential historic buildings and determined that four buildings as part of the Campus appear to meet the listing of the National Register of Historic Properties and California Register of Historic

Resources (California Register) as contributors to a potential historic district and an additional seven appurtenant elements were identified as contributing features to a potential historic district. Each of these buildings is located south of E. 120th Street.

Sacred Lands File Search

In January 2017, the California Native American Heritage Commission (NAHC) conducted a Sacred Lands File (SLF) search for the 312-acre Specific Plan Program area and identified that the search resulted in negative results because there were no sites of traditional, cultural, or religious value to Native American community that were recorded within the Specific Plan Program area. In July 2023, the NAHC conducted an SLF search for the Project site and identified that the results of the search were negative.

Cultural Resources Pedestrian Survey.

On July 17, 2023, ESA conducted a cultural resources pedestrian survey of the Project site. The survey was conducted to identify surface evidence of archaeological resources within the Project site. The results of the survey are provided below for the main and northern portions of the Project site.

The northern portion of the Project site is characterized by flat, undeveloped and previously graded land. Modern trash was encountered. A homeless encampment along the fence line that separates the Project site from the Interstate 105 right-of-way was also present during the survey. Ground surface visibility was approximately 100 percent. No archaeological resources were observed.

The main portion of the Project site was surveyed prior to the Lincoln Elementary School buildings being removed by the Compton Unified School District. The main portion of the Project site consisted of a parcel that included several school buildings along E. 118th Street and contained recreational facilities (playgrounds) and athletic areas. The ground surface was either covered with concrete, asphalt, or gravel, trees and dead grasses during the survey. As a result, ground surface visibility ranged from approximately 0 to 5 percent. Modern trash and rodent burrows were noted. No archaeological resources were observed.

Archaeological Sensitivity

Within the Final PEIR, a desktop analysis was undertaken to assess the potential for the presence of subsurface archaeological resources within the Specific Plan Program area. The desktop analysis indicates that no archaeological resources have been recorded within the Specific Plan Program area, but that several Native American burials had been previously discovered in the general vicinity. Based upon the documented presence of archaeological resources (prehistoric and historic-period), and Native American burials, near the Specific Plan Program area, as well as a Holocene geomorphic history of alluvial deposition, the Specific Plan Program area is considered to have a high sensitivity for archaeological sites, which may be deeply buried.

A more detailed geoarchaeological review of the Project site was conducted as part of the Cultural Resources Assessment Report for the Proposed Project and discussed below.

Prehistoric Resources

Review of the geologic map and geotechnical report for the Project indicate that the surface of the Project site is characterized by fill on the upper three feet, followed by younger alluvium soils made up of mixtures of sand/silt/clay. These soils date to the Holocene period – the period for which there is widely accepted evidence for human occupation of southern California. The archival research indicates that no archaeological resources have been previously recorded within the Project site or a 0.50-mile radius, and that the SLF search yielded negative results. However, the Mojave Road (P-19-187085; CHL 963), a Native American trail, and a known Native American village site are located in the vicinity of the Project site. Also, Native American burials have been found further from the Project site, but in the general vicinity. Review of topographic maps indicates that a tributary of Compton Creek was located approximately 0.40 miles away from the Project site.

Based on the age of underlying soils, the proximity to a known Native American trail, a village site and location of burial sites, the Project site is considered to have a high sensitivity for prehistoric archaeological resources. The distance from a water source somewhat diminishes the potential, but water courses moved over time in the region and may have been closer at times in the past. However, a review of historic aerials indicates that the northern portion of the Project site and portions of the main Project site (northern, southern and western portions) have been subject to previous grading, the depths of which is unknown. Additionally, approximately the first three feet of soil is composed of fill, which is not anticipated to contain intact prehistoric archaeological resources but could contain isolated or disturbed cultural materials. Therefore, the first three feet is considered to have a low potential, while soils below three feet are considered to have a high potential for encountering intact prehistoric archaeological resources.

Historic-Period Resources

Northern Portion of the Project Site

A review of historic aerials indicates that the northern portion of the Project site was developed with historic-era residential uses since at least the early 1920s. The area was later graded by at least 1989. Based on these factors, the potential to encounter historic-period archaeological resources within the northern portion of the Project site is considered high. Historic-period archaeological resources can be recovered from fill and Holocene-age alluvium.

Main Portion of the Project Site

Historic aerial review indicates that the main portion of the Project site was developed since the early 1920s with multiple structures presumed mostly to be residential and a school building in the western portion. By at least 1965, the main portion of the Project site started being developed with the Lincoln Elementary School buildings and the northernmost portion was graded. In 1998, structures in the western portion are observed as removed. In 2020, structures in the northeastern portion of the main portion of the Project site (previous Barack Obama Charter School buildings) were removed. The pedestrian survey showed that the northern and western portions of the Project site are undeveloped, while the south-central portion is either paved with concrete or asphalt (including athletic fields and a surface parking lot).

Based on these factors, the potential to encounter historic-period archaeological resources in the main portion of the Project site is considered high. Areas that appear to have been subject to greater ground disturbance, such as the northern and western parts of the main portion of the Project site, have a lower likelihood to contain intact buried deposits related to earlier residential uses, although it is possible that wells and privy deposits may extend below the depth of previous disturbances. Areas that appear to have been subject to a lesser degree of ground disturbance, such as the south-central part of the main portion of the Project site, have a higher likelihood to contain intact buried deposits related to earlier residential uses, including structural remnants and foundations/footings, refuse deposits, wells, and privies. In particular, asphalted areas have the potential to cap and preserve archaeological resources just below the surface as excavations for parking lots/asphalted areas are typically shallow or at grade. Resources related to earlier residential uses have the potential to inform the archaeological record regarding early-20th century life in Willowbrook. Additionally, there is the potential to encounter structural remains and refuse deposits related to early-to-mid 20th century educational uses throughout the main portion of the Project site. These types of resources have the potential to inform the archaeological record regarding early-to-mid-20th century education in Willowbrook. Historic-period archaeological resources can be recovered from fill and Holocene-age alluvium.

Paleontological Resources Records Search

In January 2017, a paleontological records search was conducted for the 312-acre Specific Plan Program by the LACM. The LACM reported no vertebrate paleontological localities within the Specific Plan Program area boundaries. On July 16, 2023, a paleontological records search was conducted for the Project site by the LACM. The LACM reported no paleontological resources on the Project site; however, several fossil localities (LACM VP 3365, LACM VP 3266, LACM VP 1295 and 4206, LACM VP 1344, LACM VP 3382, and LACM IP 2690) were identified nearby from the same sedimentary deposits (Pleistocene deposits from unknown formations) that occur on the Project site (Bell, 2023). Locality LACM 3365 located approximately 2 miles away from the Proposed Project yielded a fossil specimen of mammoth at an unknown depth. Locality LACM VP 3266 situated approximately 2.5 miles away from the Proposed Project yielded uncatalogued vertebrate fossils between 15 and 18 feet below ground surface (bgs). Localities LACM VP 1295 and 4206 located approximately 2 miles away from the Proposed Project produced fossil specimens of horse, bison, canine, bird, rabbit, mammoth, antelope, artiodactyl, rodent, ground sloth, and turtle at unknown depths. Locality LACM VP 1344 situated approximately 1.60 miles away from the Proposed Project yielded a fossil specimen of mammoth from an unknown depth. Locality LACM VP 3382 situated approximately 4.5 miles away from the Proposed Project produced a fossil specimen of mammoth at 5 feet bgs. Locality LACM IP 2690 located approximately 1 mile away from the Proposed Project produced fossil specimens of acorn barnacle, scaphopod, pond/moon snails, venus clam, piddock, cardita, tellin, lucine, cerith, sand dollar, cowry, tower shell, and dwarf venus.

Review of the Geologic map of the Long Beach 30'x 60' quadrangle indicates that the Proposed Project is mapped as containing young alluvium (Qya2) (Saucedo et al. 2016). These deposits are unlikely to contain vertebrate fossils. However, the young alluvium may be underlain by older Quaternary deposits that could contain vertebrate fossils. While shallow excavation or surface

grading is unlikely to uncover paleontological resources, deeper excavation into older sediments (i.e., five feet below ground surface and deeper) may uncover significant fossils.

3.5.3 Regulatory Setting

State

California Environmental Quality Act

CEQA is the principal statute governing environmental review of projects occurring in the state and is codified at *Public Resources Code (PRC) Section 21000 et seq.* CEQA requires lead agencies to determine if a Proposed Project would have a significant effect on the environment, including significant effects on historical or unique archaeological resources. Under CEQA (Section 21084.1), a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.

The *CEQA Guidelines* (Title 14 California Code of Regulations [CCR] Section 15064.5) recognize that historical resources include: (1) a resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (California Register); (2) a resource included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); and (3) any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California by the lead agency, provided the lead agency's determination is supported by substantial evidence in light of the whole record. The fact that a resource does not meet the three criteria outlined above does not preclude the lead agency from determining that the resource may be an historical resource as defined in PRC Sections 5020.1(j) or 5024.1.

If a lead agency determines that an archaeological site is a historical resource, the provisions of Section 21084.1 of CEQA and Section 15064.5 of the *CEQA Guidelines* apply. If an archaeological site does not meet the criteria for a historical resource contained in the *CEQA Guidelines*, then the site may be treated in accordance with the provisions of Section 21083, which is as a unique archaeological resource. As defined in Section 21083.2 of CEQA a "unique" archaeological resource is an archaeological artifact, object, or site, about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information;
- Has a special and particular quality such as being the oldest of its type or the best available example of its type; or,
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

If an archaeological site meets the criteria for a unique archaeological resource as defined in Section 21083.2, then the site is to be treated in accordance with the provisions of Section 21083.2, which state that if the lead agency determines that a project would have a significant effect on unique archaeological resources, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place (Section 21083.1(a)). If preservation in place is not feasible, mitigation measures shall be required. The *CEQA Guidelines* note that if an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment (*CEQA Guidelines* Section 15064.5(c)(4)).

A significant effect under CEQA would occur if a project results in a substantial adverse change in the significance of a historical resource as defined in *CEQA Guidelines* Section 15064.5(a). Substantial adverse change is defined as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired" (*CEQA Guidelines* Section 15064.5(b)(1)). According to *CEQA Guidelines* Section 15064.5(b)(2), the significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that:

A. Convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or

B. Account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in a historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

C. Convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a Lead Agency for purposes of CEQA.

In general, a project that complies with the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* (Standards) (Grimmer, 2017) is considered to have mitigated its impacts to historical resources to a less-than-significant level (*CEQA Guidelines* Section 15064.5(b)(3)).

California Register of Historical Resources

The California Register is "an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC Section 5024.1[a]). The criteria for eligibility for the California Register are based upon National Register criteria (PRC Section 5024.1[b]). Certain resources are determined by the statute to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register.

To be eligible for the California Register, a prehistoric or historic-period property must be significant at the local, state, and/or federal level under one or more of the following four criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

A resource eligible for the California Register must meet one of the criteria of significance, described above, and retain enough of its historic character or appearance (integrity) to be recognizable as a historical resource and to convey the reason for its significance. It is possible that a historic resource may not retain sufficient integrity to meet the criteria for listing in the National Register, but it may still be eligible for listing in the California Register.

Additionally, the California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed on the National Register and those formally determined eligible for the National Register;
- California Registered Historical Landmarks from No. 770 onward; and,
- Those California Points of Historical Interest that have been evaluated by the OHP and have been recommended to the State Historical Commission for inclusion on the California Register.

Other resources that may be nominated to the California Register include:

- Historical resources with a significance rating of Category 3 through 5 (those properties identified as eligible for listing in the National Register, the California Register, and/or a local jurisdiction register);
- Individual historical resources;
- Historical resources contributing to historic districts; and,
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as an historic preservation overlay zone.

California Health and Safety Code Section 7050.5

California Health and Safety Code Section 7050.5 requires that in the event human remains are discovered, the County Coroner be contacted to determine the nature of the remains. In the event the remains are determined to be Native American in origin, the Coroner is required to contact the NAHC within 24 hours to relinquish jurisdiction.

California Public Resources Code Section 5097.98

California PRC Section 5097.98, as amended, provides procedures in the event human remains of Native American origin are discovered during project implementation. PRC Section 5097.98 requires that no further disturbances occur in the immediate vicinity of the discovery, that the discovery is adequately protected according to generally accepted cultural and archaeological standards, and that further activities take into account the possibility of multiple burials. PRC Section 5097.98 further requires the NAHC, upon notification by a County Coroner, designate and notify a Most Likely Descendant (MLD) regarding the discovery of Native American human remains. The MLD has 48 hours from the time of being granted access to the site by the landowner to inspect the discovery and provide recommendations to the landowner for the treatment of the human remains and any associated grave goods.

In the event that no descendant is identified, or the descendant fails to make a recommendation for disposition, or if the land owner rejects the recommendation of the descendant, the landowner may, with appropriate dignity, reinter the remains and burial items on the property in a location that will not be subject to further disturbance.

California Government Code Sections 6254(r) and 6254.10

These sections of the California Public Records Act were enacted to protect archaeological sites from unauthorized excavation, looting, or vandalism. Section 6254(r) explicitly authorizes public agencies to withhold information from the public relating to "Native American graves, cemeteries, and sacred places maintained by the Native American Heritage Commission." Section 6254.10 specifically exempts from disclosure requests for "records that relate to archaeological site information and reports, maintained by, or in the possession of the California Department of Parks and Recreation, the State Historical Resources Commission, the State Lands Commission, the Native American Heritage Commission, another state agency, or a local agency, including the records that the agency obtains through a consultation process between a Native American tribe and a state or local agency."

Paleontological Resources

State

Paleontological resources are afforded protection by CEQA. Appendix G of the *CEQA Guidelines* provides guidance relative to significant impacts on paleontological resources, stating that a project will normally result in a significant impact on the environment if it will "…disrupt or adversely affect a paleontologic resource or site or unique geologic feature, except as part of a scientific study." Section 5097.5 of the Public Resources Code specifies that any unauthorized removal of paleontological remains is a misdemeanor. Further, the California Penal Code Section 622.5 sets the penalties for the damage or removal of paleontological resources.

The Society of Vertebrate Paleontology (SVP) has established standard guidelines for acceptable professional practices in the conduct of paleontological resource assessments and surveys, monitoring and mitigation, data and fossil recovery, sampling procedures, and specimen preparation, identification, analysis, and curation. Most practicing professional paleontologists in the nation adhere closely to the SVP's assessment, mitigation, and monitoring requirements as

specifically provided in its standard guidelines. Most state regulatory agencies accept the SVP standard guidelines as a measure of professional practice.

Local

The Conservation and Natural Resources Element (the Element) of the County's General Plan indicates that "Historic, cultural, and paleontological resources are an important part of Los Angeles County's identity" (Los Angeles County General Plan, 2015). The Element provides the following goal and policies for the treatment of historic resources:

Goal C/NR 14: Protected historic, cultural, and paleontological resources.

Policy C/NR 14.1: Mitigate all impacts from new development on or adjacent to historic, cultural, and paleontological resources to the greatest extent feasible.

Policy C/NR 14.2: Support an inter-jurisdictional collaborative system that protects and enhances historic, cultural, and paleontological resources.

Policy C/NR 14.3: Support the preservation and rehabilitation of historic buildings.

Policy C/NR 14.4*:* Ensure proper notification procedures to Native American tribes in accordance with Senate Bill 18 (2014).

Policy C/NR 14.5: Promote public awareness of historic, cultural, and paleontological resources.

Policy C/NR 14.6: Ensure proper notification and recovery processes are carried out for development on or near historic, cultural, and paleontological resources.

3.5.4 Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines and the County of Los Angeles Environmental Checklist Form, the project could have a significant impact related to cultural resources if it would:

- Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5 (see Impact 3.5-1 below).
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5 (see Impact 3.5-2 below).
- Disturb any human remains, including those interred outside of formal cemeteries (see Impact 3.5-3 below).
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature (see Impact 3.5-4 below).

3.5.5 Impact Analysis

Historical Resources

Impact 3.5-1: The Specific Plan Program could result in a significant and cumulatively considerable impact to a historical resource as defined in CEQA Guidelines Section 15064.5.

The Proposed Project would result in a less than significant and less than cumulatively considerable impact on a historical resource as defined in CEQA Guidelines Section 15064.5.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Final PEIR identified that the Specific Plan Program would have significant and unavoidable impacts to historic resources. Based on the SCCIC records search, two historic resources were identified within the Specific Plan Program area. These resources include the Mojave Road, which is a California Registered Historical Landmark No. 963; and the Martin Luther King Jr. Medical Center Historic District comprised of four contributing features and seven appurtenant elements. The Mojave Road (19-187085) CHL No. 963, was identified within the Specific Plan Program area, however, no characteristics of the historic road are visible on the surface or anticipated subsurface. The entire segment of road within the Specific Plan Program area has been impacted by previous construction associated with the existing paved Willowbrook Avenue and/or the former Southern Pacific Railroad now Metro Blue Line and Union Pacific Railroad tracks.

Additionally, the Specific Plan Program would involve modifications, rehabilitation, and demolition that could directly impact the Martin Luther King, Jr. Medical Center Campus Historic District and its four contributing buildings and seven appurtenant elements. Impacts to these buildings were determined to be potentially significant. Furthermore, the Final PEIR identified that there could be additional structures that have not been identified as historic and the implementation of the Specific Plan Program could result in the demolition of these structures and cause a significant impact.

In the past, the Project site included residential structures that were removed between the 1930s and 1950s. School buildings were constructed on the Project site but were removed between the 1990s and 2023. The school structures along E. 118th Street existed during the cultural resources pedestrian survey; however, these structures were removed from the site by the property owner, Compton Unified School District, because the structures were being used as homeless encampments and subject to vandalism and stripping of building components. These activities resulted in reoccurring safety issues since the relocation of the school operations in 2017.

Currently, the Project site includes building foundations, surface parking lots, and asphalt school play yard, but no vertical structures are located on the site. Therefore, there are no historic structures located on the Project site.

Cumulative

The geographical area of the cumulative impact to historical resources encompasses approximately a 0.50-mile surrounding the Specific Plan Program area. As development occurs within the cumulative area, impacts to historical resources could occur due to the substantial historical-age resources known to occur in the area. These impacts by cumulative development could represent significant cumulative impacts on historical resources. Because the Specific Plan Program could result in significant impacts to historical resources, the Specific Plan Program's contribution to cumulative impacts to historical resources is cumulatively considerable.

Proposed Project Evaluation

Proposed Project-Specific

Based on the SCCIC records search and pedestrian survey conducted for the Project site, there are no historic structures on the Project site. The nearest listed historic resources include the structures associated with the Martin Luther King, Jr. Medical Center Historic District comprised of four contributing features and seven appurtenant elements located at least 500 feet south of the Project site beyond the existing Charles Drew University structures and one California Registered Historical Landmark (P-19-187085) that is the Mojave Road listed as CHL No. 963. The Mojave Road resources is recorded in the vicinity of the Project site. This resource has been previously impacted through the pavement of streets and construction of railroad tracks. Implementation of the Proposed Project would result in no impacts to historic resources.

Cumulative

Cumulative development in the vicinity of the Project site could result in the demolition or substantial alteration of significant historical resources such as structures associated with the Martin Luther King, Jr. Medical Center Campus. Although cumulative significant impacts could occur, the implementation of the Proposed Project would not impact historic resources. Therefore, the Project would not contribute to cumulative impacts to historic structures.

Applicable Mitigation Measures to the Proposed Project

The Specific Plan Program included Mitigation Measures CUL-1 through CUL-4 to reduce potential impacts to historic resources located within the Specific Plan Program area. These resources are located outside of the Project site. Because there are no remaining buildings located on the Project site, the Proposed Project would not impact historic resources. Therefore, the Mitigation Measures CUL-1 through CUL-4 are not required for the Proposed Project and have been removed.

> **CUL-1 (Removed):** ~~Impacts to four significant historical resources that are eligible for listing and located within the MLK Subarea (Multi-Service Ambulatory Care Center (MACC), Augustus F. Hawkins Comprehensive Medical Health Center, Interns and Physicians Building, and Dr. H. Claude Hudson Auditorium) and the integrity of the Martin Luther King, Jr. Medical Center Campus Historic District (a fifth historic resource that is eligible for listing) shall be reduced to below the level of significance through utilization of the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines of Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings for any proposed alterations, including all site work, structural~~

~~upgrades, architectural, and mechanical systems improvements and repairs. The work shall conform to the standards and guidelines for "rehabilitation." Conformance with the Secretary of the Interior's Standards shall be monitored by an architectural historian or historic architect who meets the Secretary of the Interior's Professional Qualification Standards. Completion of this mitigation measure shall be monitored and enforced by the County of Los Angeles.~~

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

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

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

CUL-4 (Removed): ~~Demolition of structures that meet the eligibility requirements for the CRHR and/or the County of Los Angeles Register shall be avoided. If demolition of a portion of an eligible structure cannot be feasibly avoided as determined by the County of Los Angeles, the alterations of a structure eligible as a historical resource shall be accomplished in accordance with the Secretary of the Interior's *Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings*. To ensure compliance with this measure, the County shall determine the need for a historic resources evaluation of a structure if a structures is proposed for demolition or alteration and is or will be 50 years or older prior to project construction, or if a structure is proposed for demolition or alteration that affect the eligibility of a historic resource in the immediate surroundings of a structure proposed for demolition or alteration.~~

Conclusion

The Final PEIR identified that the Specific Plan Program could have a significant and unavoidable impact on historical resources such as buildings or features associated with the Martin Luther King, Jr. Medical Center Campus Historic District as well as other structures that have not been evaluated as historic resources. Implementation of Mitigation Measures CUL-1 through CUL-4 would reduce the impacts from the implementation of the Specific Plan Program, but impacts would remain significant. Unlike the Specific Plan Program, the Proposed Project would not impact historic resources, and no mitigation measures are required. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in the severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Archaeological Resources

Impact 3.5-2: The Specific Plan Program and Proposed Project could result in a significant and cumulatively considerable impact on an archaeological resource as defined in CEQA Guidelines Section 15064.5.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Final PEIR determined that the Specific Plan Program could result in significant impacts on cultural resources from ground-disturbing activities and/or damage, destruction, or alteration of historic structures. Ground-disturbing activities include project-related excavation, grading, trenching, vegetation clearance, the operation of heavy equipment, or other surface and sub-surface disturbance that could damage or destroy surficial or buried archaeological resources, including prehistoric and historic remains or human burials.

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

Cumulative

The geographical area of the cumulative impact to archaeological resources encompasses approximately 0.50-mile surrounding the Specific Plan Program area. As development occurs within the cumulative area, potential impacts to archaeological resources could occur due to the substantial archaeological resources known to occur in the area. These potential impacts by cumulative development could represent significant cumulative impacts on archaeological resources. Because the Specific Plan Program could result in significant impacts to archaeological resources, the Specific Plan Program's contribution to cumulative impacts to archaeological resources is cumulatively considerable.

Proposed Project Evaluation

Proposed Project-Specific

The Cultural Resources Assessment Report conducted in August 2024 by ESA indicates that based on the age of underlying soils, the proximity to a known Native American trail, village site and burial sites, the Project site is considered to have a high sensitivity for prehistoric archaeological resources. The distance from a water source somewhat diminishes the potential, but water courses moved over time in the region and may have been closer at times in the past. However, a review of historic aerials indicates that the northern portion of the Project site and portions of the main Project site (northern and western portions) have been subject to previous grading, the depths of which are unknown. Additionally, approximately the first three feet of soil is composed of fill, which is not anticipated to contain intact prehistoric archaeological resources but could contain isolated or disturbed cultural materials. Thus, the first three feet is considered to have a low potential, while soils below three feet are considered to have a high potential for encountering intact prehistoric archaeological resources. Therefore, as with the implementation of the Specific Plan Program, the Proposed Project could result in significant impacts to archaeological resources due to the potential for archeological sensitivity.

Cumulative

As development occurs within the cumulative area, potential impacts to archaeological resources could occur due to the high sensitivity for prehistoric archaeological resources in the vicinity. These potential impacts by cumulative development could represent significant cumulative impacts on archaeological resources. Because the Proposed Project could result in significant impacts to archeological resources, the Proposed Project's contribution to cumulative impacts to archaeological resources is cumulatively considerable.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, Mitigation Measure CUL-5 is required for the Proposed Project. However, because Mitigation Measure CUL-5 required a Phase I cultural resources inventory, the inventory (as provided in Appendix B of this Addendum to Final PEIR) was completed for the Proposed Project that included an archeological survey. No resources were found during the survey. Therefore, the portions of the mitigation measure that requires a Phase I cultural resources inventory, as well as processes to follow if resources are found during the survey can be removed for the Proposed Project because these requirements have been completed. The portion of the mitigation measure referring to project-level construction is still required; however, the mitigation measure includes updates to reflect the current procedures to implement sensitivity training of construction personnel, monitoring, and discovery of current unknown resources. Following is the revised Mitigation Measure CUL-5 which retains the intent of the mitigation measure.

> **CUL-5 (Revised):** Avoidance, preservation or data recovery shall occur for archaeological resources that could be affected by ground disturbing activities and are found to be significant resources. To ensure that developments in accordance with the Specific Plan Program do not result in significant impacts to pre-historic or historic archaeological resources, the following shall be implemented.
>
> ~~Individual development projects or other ground disturbing activities such as installation of utilities, shall be subject to a Phase I cultural resources inventory on a project-specific basis prior to the County's approval of project plans. The study shall be carried out by a qualified archaeologist, defined as an archaeologist meeting the Secretary of the Interior's Standards for professional archaeology. The cultural resources inventory would consist of: a cultural resources records search to be conducted at the South Central Coastal Information Center; a Sacred Lands File Search by the Native American Heritage Commission (NAHC) and with interested Native Americans identified by the NAHC; a pedestrian archaeological survey where deemed appropriate by the archaeologist; and recordation of all identified archaeological resources on California Department of Parks and Recreation 523 forms. If potentially significant cultural resources are encountered during the survey, the County shall require that the resources are evaluated for their eligibility for listing in the California Register of Historical Resources and for significance as a historical resource or unique archaeological resource per CEQA Guidelines Section 15064.5. Recommendations shall be made for treatment of these resources if found to be significant. Per CEQA Guidelines Section 15126.4(b)(3), project redesign and preservation in place shall be the preferred means of mitigation to avoid impacts to significant cultural resources, including prehistoric and historic archaeological sites, locations of importance to Native Americans, human remains, historical buildings, structures and landscapes. Methods of avoidance may include, but shall not be limited to, project re-route or re-design, project cancellation, or identification of protection measures such as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures, which may include data recovery or other appropriate measures, in consultation with the County, and local Native American representatives expressing interest.~~
>
> The Applicant shall retain an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for Archaeology (Qualified Archaeologist) to carry

out all mitigation related to archaeological resources. Prior to start of ground-disturbing activities, the Qualified Archaeologist or their designee shall conduct cultural resources sensitivity training for all construction personnel. Construction personnel shall be informed 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, and safety precautions to be taken when working with archaeological monitors. The County shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance.

Archaeological monitoring shall be conducted during ground disturbing activities, such as clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the Project. Monitoring shall be conducted by an archaeologist who is familiar with the types of archaeological resources that could be encountered and who will work under the direct supervision of the Qualified Archaeologist. Monitoring can be reduced to part-time inspections or ceased entirely if determined appropriate by the Qualified Archaeologist, based on field observations.

During project-level construction, should prehistoric or historic subsurface cultural resources be discovered, the archaeological monitor shall be empowered to halt or redirect ground-disturbing activities away from the vicinity of the discovery (within approximately 100 feet) until it has been evaluated. The archaeological monitor shall keep daily logs detailing the types of activities and soils observed, and any discoveries. The Qualified Archaeologist shall ~~all activity in the vicinity of the find shall stop and a qualified archaeologist will be contacted to~~ assess the significance of the find according to CEQA Guidelines Section 15064.5. If any find is determined to be significant, the archaeologist shall determine, in consultation with the County, and local Native American groups expressing interest, appropriate avoidance measures or other appropriate mitigation. Per CEQA Guidelines Section 15126.4(b)(3), project redesign and preservation in place shall be the preferred means to avoid impacts to significant cultural resources. Methods of avoidance may include, but shall not be limited to, project re-route or re-design, project cancellation, or identification of protection measures such as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the Q~~q~~ualified A~~a~~rchaeologist shall develop additional treatment measures within an Archaeological Resources Treatment Plan in consultation with the County and local Native American groups expressing interest, which may include data recovery or other appropriate measures. All significant cultural materials recovered will be, as necessary and at the discretion of the consulting archaeologist and in consultation with local Native American groups expressing interest, subject to scientific analysis, professional museum curation, and documentation according to current professional standards. The treatment plan shall include provisions for the final disposition of the recovered resources, which may include onsite reburial, curation at a public, non-profit institution, or donation to a local Native American Tribe, school, or historical society.

At the conclusion of archaeological monitoring and prior to the release of the grading bond, the Qualified Archaeologist shall prepare a final monitoring report. The report shall include a summary of monitoring results, description of resources unearthed, if any, significance evaluation and treatment of the resources, and the results of the artifact processing, analysis, and research. Appropriate California Department of Parks and Recreation 523 Forms shall be appended to the report, as necessary. The report shall be submitted by the Applicant to the County to signify the satisfactory completion of the

Project and required mitigation measures. The Qualified Archaeologist shall submit the final report to the South Central Coastal Information Center within 30 days of its acceptance by the County.

Conclusion

As with the Specific Plan Program, the Proposed Project has the potential to significantly impact archaeological resources, but these impacts under the Specific Plan Program as well as the Proposed Project would be reduced to less than significant with the implementation of Mitigation Measure CUL-5. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in the severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Human Remains

Impact 3.5-3: The Specific Plan Program and Proposed Project could result in a significant and cumulatively considerable impact on human remains, including those interred outside formal cemeteries.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The SCCIC records search conducted on July 16, 2015, for the Specific Plan Program identified archaeological sites 19-000385, 19-002757, and 19-2792, which indicate that human remains near the Specific Plan Program area had been identified during construction of buildings and pipeline trenching. In the event that human remains are discovered during construction activities within the Specific Plan Program area, including those interred outside of formal cemeteries, the human remains could be inadvertently damaged, which could be a significant impact. Therefore, the Specific Plan Program would have a significant impact to human remains. To reduce potential impact to human remains to less than significant, the Specific Plan Program would implement Mitigation Measure CUL-7 that requires the cessation of grading and construction activities and contacting the coroner if human remains are uncovered.

Cumulative

The geographical area of the cumulative impact to human remains encompasses approximately 0.50-mile surrounding the Specific Plan Program area. As development occurs within the cumulative area, potential impacts to human remains could occur due to human remains/burials known to occur in the Specific Plan Program area. These potential impacts by cumulative development could represent significant cumulative impacts on human remains. Because the Specific Plan Program could result in significant impacts to human remains, the Specific Plan Program's contribution to cumulative impacts to human remains is cumulatively considerable.

Proposed Project Evaluation

Proposed Project-Specific

As with the Specific Plan Program, the Proposed Project could result in potential impacts to human remains based on the presence of human remains discovered in the vicinity, but not within, of the Specific Plan Program area during construction activities associated with archaeological sites 19-000385, 19-002757, and 19-2792. Therefore, as with the Specific Plan Program, the Proposed Project would have a significant impact on human remains during project construction activities.

Cumulative

The geographical area of the cumulative impact to human remains encompasses approximately 0.50-mile surrounding the Project site. As development occurs within the cumulative area, potential impacts to human remains could occur due to human remains/burials known to occur in the vicinity of the Project site. These potential impacts by cumulative development could represent significant cumulative impacts on human remains. Because the Proposed Project could result in significant impacts to human remains, the Project's contribution to cumulative impacts to human remains is cumulatively considerable.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, the Proposed Project is required to implement Mitigation Measure CUL-7. This measure has been revised to provide additional specific procedures to implement in the event human remains are encountered; however, the intent of the measure remains the same.

> **CUL-7 (Revised):** If human remains are encountered, the Applicant ~~County or its contractor~~ shall halt work in the vicinity (within 100 feet) of the find and contact the Los Angeles County Coroner in accordance with PRC Section 5097.98 and Health and Safety Code Section 7050.5. If the County Coroner determines that the remains are of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC) ~~will be notified~~ in accordance with Health and Safety Code Section 7050.5, subdivision (c), and PRC Section 5097.98. The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD). The MLD may, with the permission of the landowner, or his or her 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. Upon the discovery of the Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this mitigation measure, with the MLD regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the MLD on all reasonable options regarding their preferences for treatment. ~~will designate an MLD for the remains per PRC Section 5097.98. Until the landowner has conferred~~

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

Conclusion

As with the Specific Plan Program, the Proposed Project would have a significant impact to human remains during project demolition and construction, but the impact would be reduced to less than significant with Mitigation Measure CUL-7. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in the severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Paleontological Resources

Impact 3.5-4: The Specific Plan Program and Proposed Project could result in a significant and cumulatively considerable direct or indirect impact on a unique paleontological resource or site or unique geologic feature.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Final PEIR identified that the Specific Plan Program area is underlain by younger Quaternary Alluvium, which is unlikely to contain vertebrate fossils. However, the younger Alluvium may be underlain by older Quaternary deposits that are known to contain vertebrate fossils. Fossils have been found within 1.5 miles of areas in similar deposits. Thus, the LACM considers the Specific Plan Program area to have a moderate paleontological sensitivity. While shallow excavation or surface grading is unlikely to uncover paleontological resources, deeper excavation into older sediments may uncover significant fossils. Thus, any deep excavations (five feet below ground surface and deeper) in the Specific Plan Program area could result in impacts to paleontological resources. Therefore, implementation of the Specific Plan Program could result in significant impacts to paleontological resources. As identified in the Final PEIR, the implementation of Mitigation Measure CUL-6 would reduce the potential impact to paleontological resources to less than significant.

Cumulative

The geographical area of the cumulative impact to paleontological resources encompasses approximately 0.50-mile surrounding the Specific Plan Program area. As development occurs within the cumulative area, potential impacts to paleontological resources could occur due to the presence of older Quaternary deposits that are known to contain vertebrate fossils in the area. These potential impacts by cumulative development could represent significant cumulative impacts on paleontological resources. Because the Specific Plan Program could result in

significant impacts to paleontological resources, the Specific Plan Program's contribution to cumulative impacts to paleontological resources is cumulatively considerable.

Proposed Project Evaluation

Proposed Project-Specific

A paleontological resources database search was conducted by the LACM on July 16, 2023 (see Appendix C of this Addendum to Final PEIR). The records search indicated that no fossil localities lie directly within the Project site; however, several fossil localities (LACM VP 3365, LACM VP 3266, LACM VP 1295 and 4206, LACM VP 1344, LACM VP 3382, and LACM IP 2690) were identified nearby from the same sedimentary deposits (Pleistocene deposits from unknown formations) that occur in the Project site (Bell, 2023). These localities yielded fossil specimens of mammoth, horse, bison, canine, bird, rabbit, antelope, artiodactyl, rodent, ground sloth, turtle, uncatalogued vertebrate fossils, acorn barnacle, scaphopod, pond/moon snails, venus clam, piddock, cardita, tellin, lucine, cerith, sand dollar, cowry, tower shell, and dwarf venus. These localities are located between 1 and 2 miles away from the Project site and were found at unknown depths, and depths between 5 and 18 feet below ground surface.

Review of the Geologic map of the Long Beach 30'x 60' quadrangle indicates that the Project site is mapped as containing young alluvium (Qya2) (Saucedo et al. 2016). These deposits are unlikely to contain vertebrate fossils. However, as with the Specific Plan Program area, the young alluvium may be underlain by older Quaternary deposits in the Project site that could contain vertebrate fossils. While shallow excavation or surface grading is unlikely to uncover paleontological resources, deeper excavation into older sediments may uncover significant fossils. Thus, any deep excavations (five feet below ground surface and deeper) in the Project site could result in impacts to paleontological resources. Therefore, implementation of the Proposed Project could result in significant impacts to paleontological resources.

Cumulative

The geographical area of the cumulative impact to paleontological resources encompasses approximately 0.50-mile surrounding the Project site. As development occurs within the cumulative area, potential impacts to paleontological resources could occur due to the presence of older Quaternary deposits that are known to contain vertebrate fossils in the area. These potential impacts by cumulative development could represent significant cumulative impacts on paleontological resources. Because the Project site could result in significant impacts to paleontological resources, the Project's contribution to cumulative impacts to paleontological resources is cumulatively considerable.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, the Proposed Project is required to implement Mitigation Measure CUL-6.

> **CUL-6:** The project applicant shall retain a qualified paleontologist (in accordance with the Society of Vertebrate Paleontologists) to monitor all ground-disturbing activities in native soils or sediments beginning at five feet below ground surface and deeper. If the paleontologist, upon observing initial earthwork, determines there is low potential for

discovery, no further action shall be required and the paleontologist shall submit a memo to the County confirming findings of low potential.

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

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

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

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

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

Conclusion

As with the Specific Plan Program, the Proposed Project could result in significant impacts to paleontological resources. However, as with the Specific Plan Program, the implementation of Mitigation Measure CUL-6 would reduce impact to less than significant. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with

respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in the severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

3.5.6 References

Bell, Alyssa. 2023. Paleontological Resources for the CMWC Wellness Project. July 16.

Environmental Science Associates. 2023. CMWC Wellness Campus Development Project, Cultural Resources Assessment Report. July.

Los Angeles County. 2015. Los Angeles County General Plan, Chapter 9: Conservation and Natural Resources Element. Available at: https://case.planning.lacounty.gov/assets/upl/project/gp_final-general-plan-ch9.pdf. Accessed on August 10, 2024.

Saucedo, George J., H. Gary Greene, Michael P. Kennedy, and Stephen P. Bezore. 2016, *Geologic Map of the Long Beach 30′ × 60′ Quadrangle, California*. California Geological Survey, Sacramento, California.

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3.6 Energy

3.6.1 Introduction

This section analyzes effects on energy resources due to construction and operation of the Proposed Project. This section includes a brief summary of the environmental setting included in the Final PEIR, and the identification of any direct or indirect changes to the setting that may have occurred since the certification of the Final PEIR. In addition, a brief summary of the regulatory setting included in the Final PEIR and any substantive revisions to the regulatory setting that has occurred since the certification of the Final PEIR. This section also includes the thresholds of significance and summary of the energy impacts and mitigation measures addressed in the Final PEIR as well as the potential impacts associated with the Proposed Project's energy consumption. The Proposed Project's anticipated energy use is estimated, the potential for impacts due to inefficient or unnecessary consumption, or conflicts with energy related plans are assessed, and conservation measures are considered to address impacts if they are significant. Finally, this section provides a conclusion of whether (1) the Proposed Project includes substantial changes that would require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact related to energy; (2) substantial changes in the circumstances under which the Proposed Project is undertaken would require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact related to energy; or (3) new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3) exist related to energy.

3.6.2 Environmental Setting

Electricity

Southern California Edison (SCE) is the electricity provider for Los Angeles County. SCE provides electrical services to approximately 15 million people, 180 incorporated cities, 15 counties, 5,000 large businesses, and 280,000 small businesses throughout its 50,000-square-mile service area (SCE, 2024a). The generating capacity of a unit of electricity is expressed in megawatt (MW). One MW provides enough energy to power 1,000 average California homes per day. Net generation refers to the gross amount of energy produced by a unit; minus the amount of energy the unit consumes. Generation is typically measured in megawatt-hours (MWh), kilowatt-hours (kWh), or gigawatt-hours (GWh).

SCE produces and purchases its energy from a mix of conventional and renewable generating sources. **Table 3.6-1**, *Electric Power Mix Delivered to Retail Customers in 2022,* displays the electric power mix that was delivered to retail customers for SCE compared to the statewide power mix for 2022, the most recent year for which data is available. The total amount of energy consumed by SCE customers in 2023 was 79,256 GWh (SCE 2024b).

TABLE 3.6-1
ELECTRIC POWER MIX DELIVERED TO RETAIL CUSTOMERS IN 2022

Energy Resource	2022 SCE	2022 Statewide Power Mix (for comparison)[a]
Eligible Renewable	**33.2%**	**35.8%**
Biomass & bio-waste	0.1%	2.1%
Geothermal	5.7%	4.7%
Small hydroelectric	0.5%	1.1%
Solar	17.0%	17.0%
Wind	9.8%	10.8%
Coal	**0.0%**	**2.1%**
Large Hydroelectric	**3.4%**	**9.2%**
Natural Gas	**24.7%**	**36.4%**
Nuclear	**8.3%**	**9.2%**
Other	**0.1%**	**0.1%**
Unspecified sources of power[b]	**30.3%**	**7.1%**
Total	**100%[c]**	**100%[c]**

NOTES:

a. Percentages are estimated annually by the California Energy Commission based on the electricity sold to California consumers during the previous year. The eligible renewable percentage above does not reflect RPS compliance, which is determined using a different methodology.
b. "Unspecified sources of power" means electricity from transactions that are not traceable to specific generation sources.
c. Totals may not add up exactly due to rounding.

SOURCES: CEC 2024; https://www.energy.ca.gov/filebrowser/download/6072. Accessed August 2024

Natural Gas

Natural gas is a combustible mixture of simple hydrocarbon compounds (primarily methane) that is used as a fuel source. Natural gas consumed in California is obtained from naturally occurring reservoirs and delivered through high-pressure transmission pipelines. Natural gas provides almost one-third of the State's total energy requirements. Natural gas is measured in terms of both cubic feet (cf) or British thermal units (Btu).

Natural gas is used for cooking, space heating, water heating, electricity generation, and as an alternative transportation fuel. The Southern California Gas Company (SoCalGas) is the principal distributor of natural gas in Southern California, serving residential, commercial, and industrial markets. SoCalGas serves approximately 21 million customers in more than 500 communities encompassing approximately 24,000 square miles throughout central and southern California, from the City of Visalia to the US/Mexican border (SoCalGas 2024a).

SoCalGas, along with five other California utility providers, released the *2024 California Gas Report*, presenting a forecast of natural gas supplies and requirements for California through the year 2040 (SoCalGas 2024b). The 2024 California Gas Report predicts gas demand for all sectors (residential, commercial, industrial, energy generation and wholesale exports) and presents best estimates, as well as scenarios for hot and cold years. Overall, SoCalGas predicts a decrease in

natural gas demand in future years due to a decrease in per capita usage, energy efficiency policies, and the State's transition to renewable energy displacing fossil fuels including natural gas.

Transportation Energy

According to the Energy Information Administration, transportation accounts for approximately 42.4 percent of California's total energy consumption (USEIA 2023a). The annual transportation fuel consumption of diesel and gasoline in 2022 in California (the most recent year for which statewide data is available) is approximately 1,846 million gallons and 11,495 million gallons, respectively (CEC 2023). Transportation fuel consumption of diesel and gasoline for Los Angeles County in 2022 is 464 million gallons and 3,070 million gallons, respectively. The estimated Los Angeles County and Statewide transportation fuel consumption is based on retail sale data from the California Energy Commission (CEC) (CEC 2023).

3.6.3 Regulatory Setting

Federal

Energy Policy Act of 1992

The Energy Policy Act set goals, created mandates, and amended utility laws to increase clean energy use and improve overall energy efficiency in the United States. It established regulations requiring certain federal, state, and alternative fuel provider fleets to build an inventory of alternative fuel vehicles. It was amended several times in the Energy Conservation and Reauthorization Act of 1998 and in 2005 via the Energy Policy Act in 2005, which emphasized alternative fuel use and infrastructure development.

Energy Policy Act of 2005

The Energy Policy Act of 2005 includes provisions for renewed and expanded tax credits for electricity generated by qualified energy sources; provides bond financing, tax incentives, grants, and loan guarantees for clean renewable energy and rural community electrification; and establishes a federal purchase requirement for renewable energy. The Renewable Fuel Standard (RFS) program was created under the Energy Policy Act of 2005 and established the first renewable fuel volume mandate in the United States.

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 (EISA) facilitates the reduction of national GHG emissions by requiring the following:

- Increasing the supply of alternative fuel sources by setting mandatory Renewable Fuel Standards (RFS) that requires fuel producers to use at least 36 billion gallons of biofuel in 2022;[1]

[1] The statutory target has not been met primarily due to underproduction of advanced biofuels caused by a variety of factors, such as infrastructure limitations, technological development, and limited federal assistance. The United States Environmental Protection Agency Administrator has the authority to waive the statutory requirements under certain conditions. The Administrator has used this waiver authority multiple times to reduce target volumes. See: Congressional Research Service, 2023.

- Prescribing or revising standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances; and
- While superseded by the United States Environmental Protection Agency (USEPA) and the National Highway Traffic Safety Administration (NHTSA) actions described above (refer to United States Department of Transportation, United States Department of Energy, and United States Environmental Protection Agency, above), (i) establishing miles per gallon targets for cars and light trucks and (ii) directing the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for trucks.

Fuel Economy Standards

On September 15, 2009, the National Highway Traffic Safety Administration (NHTSA) and U.S. Environmental Protection Agency (USEPA) announced a proposed joint rule that would explicitly tie fuel economy to GHG emissions reductions requirements. In April 2020, USEPA and NHTSA amended the Corporate Average Fuel Economy (CAFE) and GHG emissions standards for passenger cars and light trucks and established new less stringent standards, covering model years 2021 through 2026 (Part Two of the Safer Affordable Fuel-Efficient [SAFE] Vehicles Rule). The CAFE and carbon dioxide (CO_2) emissions standards increase in stringency at 1.5 percent per year from model year 2020 levels over model years 2021 through 2026. California, 22 other states, and the District of Columbia filed a petition for review of the final rule on May 27, 2020. On April 22, 2021, NHTSA proposed to formally roll back portions of the SAFE Vehicles Rule, thereby restoring California's right to set more stringent fuel efficiency standards. NHTSA is also planning to issue a new rule to increase the national fuel economy standard for light-duty vehicles beyond those in Part Two of the SAFE Vehicles Rule US DOT 2021). Moreover, on August 5, 2021, President Joe Biden signed an executive order that targets making half of all new vehicles sold in 2030 zero-emissions vehicles, including battery electric, plug-in hybrid electric, or fuel cell electric vehicles (White House Briefing Room 2021). More recently proposed federal motor vehicle tailpipe emissions standards include:

- Revocation of the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule: On March 14, 2022, the USEPA published its Notice of Decision to restore California's waiver, which allows California to set more stringent vehicle fuel efficiency standards, rescinding the SAFE Vehicles Rule (Federal Register Volume 87, page 14332).
- Issuance of the Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards: The issuance of these standards revises the GHG standards for vehicles from model year 2023 through model year 2026 and establishes the most stringent GHG standards ever set for the light-duty vehicle sector, which are expected to result in average fuel economy label values of 40 miles per gallon, while the standards they replace (the SAFE rule standards) would achieve only 32 miles per gallon in model year 2026 vehicles (USEPA 2021).

State

California Building Standards Code (Title 24, Parts 6 and 11)

The California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations [CCR], Title 24, Part 6) were adopted to ensure that building construction and system design and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The current California Building Energy Efficiency Standards (Title 24 standards) are the 2022 Title 24 standards, which became effective January 1, 2023. The 2022 Title 24 standards include efficiency improvements to the non-residential standards, which include alignment with the American Society of Heating and Air-Conditioning Engineers (ASHRAE) 90.1-2019 national standards (CEC 2022).

The California Green Building Standards Code (CCR, Title 24, Part 11), commonly referred to as the CALGreen Code, became effective in 2023. The 2022 CALGreen Code includes mandatory measures for non-residential development related to site development, energy efficiency, water efficiency and conservation; material conservation and resource efficiency; and environmental quality (ICC 2022). For example, the standards encourage efficient electric heat pumps, establish electric-ready requirements for new homes, expand solar photovoltaic and battery storage standards, strengthen ventilation standards, and more.

Renewables Portfolio Standard

The State has adopted regulations to increase the proportion of electricity from renewable sources. In 2008, Executive Order S-14-08 expanded the State's Renewable Portfolio Standard (RPS) goal to 33 percent renewable power by 2020. In 2009, Executive Order S-21-09 directed CARB (under its Assembly Bill [AB] 32 authority) to enact regulations to help the State meet the 2020 goal of 33 percent renewable energy. The 33 percent by 2020 RPS goal was codified with the passage of Senate Bill (SB) X1-2. This new RPS applied to all electricity retailers in the state, including publicly owned utilities (POUs), investor-owned utilities, electricity service providers, and community choice aggregators. In 2018, SB 100 further increased California's RPS and requires retail sellers and local POUs to procure eligible renewable electricity for 44 percent of retail sales by the end of 2024, 52 percent by the end of 2027, and 60 percent by the end of 2030; and requires that CARB should plan for 100 percent eligible renewable energy resources and zero-carbon resources by the end of 2045.

The California Public Utilities Commission (CPUC) and the CEC jointly implement the RPS program. The CPUC's responsibilities include: (1) determining annual procurement targets and enforcing compliance; (2) reviewing and approving each investor-owned utility's renewable energy procurement plan; (3) reviewing contracts for RPS-eligible energy; and (4) establishing the standard terms and conditions used in contracts for eligible renewable energy.

California Health and Safety Code (HSC), Division 25.5/California Global Warming Solutions Act of 2006

In 2006, the California State Legislature adopted AB 32 (codified in the California Health and Safety Code [HSC], Division 25.5 – California Global Warming Solutions Act of 2006), which focuses on reducing GHG emissions in California to 1990 levels by 2020. In 2016, the California

State Legislature adopted SB 32 and its companion bill AB 197; both were signed by Governor Brown. SB 32 and AB 197 amend HSC Division 25.5 and establish a new climate pollution reduction target of 40 percent below 1990 levels by 2030 and include provisions to ensure that the benefits of state climate policies reach disadvantaged communities.

Senate Bill 100

On September 10, 2018, Governor Brown signed SB 100, which requires retail sellers and local publicly owned electric utilities to procure eligible renewable electricity for 44 percent of retail sales by December 31, 2024, 52 percent by December 31, 2027, and 60 percent by December 31, 2030, and that the California Air Resources Board (CARB) should plan for 100 percent eligible renewable energy resources and zero-carbon resources by December 31, 2045. The California Public Utilities Commission (CPUC) and the CEC jointly implement the RPS program. The CPUC's responsibilities include: (1) determining annual procurement targets and enforcing compliance; (2) reviewing and approving each investor-owned utility's renewable energy procurement plan; (3) reviewing contracts for RPS-eligible energy; and (4) establishing the standard terms and conditions used in contracts for eligible renewable energy. With SCE exceeding the 33 percent by 2020 goal, and current new renewable development, SCE is on track to meet the 2030 goal of 60 percent.

Senate Bill 1020

This bill would instead include as regions for these workshops federal extreme nonattainment areas that have communities with minority populations, communities with low-income populations, or both.

Under existing law, it is the policy of the state that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045.

This bill would revise that state policy to instead provide that eligible renewable energy resources and zero-carbon resources supply 90 percent of all retail sales of electricity to California end-use customers by December 31, 2035, 95 percent of all retail sales of electricity to California end-use customers by December 31, 2040, 100 percent of all retail sales of electricity to California end-use customers by December 31, 2045, and 100 percent of electricity procured to serve all state agencies by December 31, 2035, as specified.

CARB's Advanced Clean Cars Program

The Advanced Clean Cars emissions-control program was approved by CARB in 2012 and is closely associated with the Pavley regulations. The program requires an increase in the number of zero-emissions vehicle models for years 2015 through 2025 to control smog, soot and GHG emissions. By 2025, zero-emissions vehicles (ZEVs) must be 22 percent of large volume manufacturers overall production (CARB 2012). This program includes the Low-Emissions Vehicle (LEV) regulations to reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles; and ZEV regulations to require manufacturers to produce an increasing number of pure ZEVs (meaning battery and fuel cell electric vehicles) with the provision to produce plug-in hybrid electric vehicles (PHEV) between 2018 and 2025.

CARB's Advanced Clean Trucks Program

The Advanced Clean Trucks (ACT) regulations were approved on June 25, 2020, and require that manufacturers sell zero-emissions or near-zero-emissions trucks as an increasing percentage of their annual California sales beginning in 2024. Refer to Section 3.8, Greenhouse Gas Emissions, for additional details.

Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling

In 2004, CARB adopted an Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling in order to reduce public exposure to diesel particulate matter emissions (Title 13 California Code of Regulations [CCR] Section 2485 and Title 17 CCR Section 93115) (CARB 2021). This measure does not allow diesel-fueled commercial vehicles to idle for more than five minutes at any given location. While the goal of this measure is primarily to reduce public health impacts from diesel emissions, compliance with the regulation also results in energy savings in the form of reduced fuel consumption from unnecessary idling. Refer to Section 3.3, *Air Quality*, for additional details.

Regional

South Coast Air Quality Management District

As discussed in Section 3.3, *Air Quality*, of this Addendum, the South Coast Air Quality Management District (SCAQMD) is responsible for air quality planning in the South Coast Air Basin (where the Proposed Project is located) and developing rules and regulations to bring the Air Basin into attainment of the ambient air quality standards. As part of its efforts to reduce local air pollution, SCAQMD has promoted a number of programs to promote energy conservation, low-carbon fuel technologies (natural gas vehicles; electric-hybrids, hydraulic-hybrids, and battery-electric vehicles), renewable energy, VMT reduction programs, and market incentive programs.

Sustainable Communities Strategy

Adopted by the State on September 30, 2008, the Sustainable Communities and Climate Protection Act of 2008, or SB 375, establishes mechanisms for the development of regional targets for reducing passenger vehicle GHG emissions. In April 2024, SCAG adopted the 2024–2050 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS), referred to as Connect SoCal 2024. Using growth forecasts and economic trends, Connect SoCal provides a vision for transportation throughout the region for the next 25 years. Connect SoCal successfully achieves and exceeds the GHG emission-reduction targets set by CARB. Compliance with and implementation of Connect SoCal policies and strategies would have the co-benefits of reducing per capita vehicle miles travelled (VMT) and corresponding decreases in per capita transportation-related fuel consumption. Refer to Section 3.8, *Greenhouse Gas Emissions*, for additional details.

Local

OurCounty: Los Angeles Countywide Sustainability Plan

The Los Angeles Countywide Sustainability Plan, also named OurCounty, is a regional sustainability plan for Los Angeles County (Los Angeles County 2019). The following OurCounty goals may apply to the Proposed Project:

Goal 1: Resilient and healthy community environments where residents thrive in place

Goal 2: Buildings and infrastructure that support human health and resilience

Goal 3: Equitable and sustainable land use and development without displacement

Goal 6: Accessible parks, beaches, recreational waters, public lands, and public spaces that create opportunities for respite, recreation, ecological discovery and cultural activities.

Goal 7: A fossil fuel-free LA County

Goal 9: Sustainable production and consumption of resources

Los Angeles County General Plan

The Los Angeles County General Plan 2035 provides the fundamental basis for the County's land use and development policy, and represents the basic community values, ideals, and aspirations to govern a shared environment through 2035. The General Plan addresses all aspects of development including public health, land use, community character, transportation, economics, housing, air quality, and other topics. The General Plan sets forth objectives, policies, standards, and programs for land use and new development, circulation and public access, and service systems to foster healthy, livable, and sustainable communities.

The applicable measures of the Los Angeles County General Plan Air Quality Element, Conservation and Natural Resources Element, Land Use Element, and Mobility Element regarding energy are specified below (Los Angeles County 2022).

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

Policy AQ 3.5: Encourage energy conservation in new development and municipal operations.

Policy AQ 3.6: Support rooftop solar facilities on new and existing buildings.

Goal C/NR 12: Sustainable management of renewable and non-renewable energy resources.

Policy C/NR 12.1: Encourage the production and use of renewable energy resources.

Policy C/NR 12.2: Encourage the effective management of energy resources, such as ensuring adequate resources to meet peak demands.

Policy C/NR 12.3: Encourage distributed systems that use existing infrastructure and reduce environmental impacts.

Goal ED 1: An economic base and fiscal structures that attract and retain valuable industries and businesses.

Policy ED 1.2: Encourage and foster the development of the renewable energy economic sectors.

Goal LU 11: Development that utilize sustainable design techniques.

Policy LU 11.1: Encourage new development to employ sustainable energy practices, such as utilizing passive solar techniques and/or active solar technologies.

Policy LU 11.2: Support the design of developments that provide substantial tree canopy cover, and utilize light-colored paving materials and energy-efficient roofing materials to reduce the urban heat island effect.

Policy LU 11.3: Encourage development to optimize the solar orientation of buildings to maximize passive and active solar design techniques.

Policy LU 11.4: Encourage subdivisions to utilize sustainable design practices, such as maximizing energy efficiency through lot configuration; preventing habitat fragmentation; promoting stormwater retention; promoting the localized production of energy; promoting water conservation and reuse; maximizing interconnectivity; and utilizing public transit.

Policy LU 11.8: Encourage sustainable subdivisions that meet green neighborhood standards, such as Leadership in Energy and Environmental Design–Neighborhood Development (LEEDND).

Goal M 2: Interconnected and safe bicycle-and pedestrian-friendly streets, sidewalks, paths and trails that promote active transportation and transit use.

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

Policy M 2.6*:* Encourage the implementation of future designs concepts that promote active transportation, whenever available and feasible.

Goal M 5: Land use planning and transportation management that facilitates the use of transit.

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

Goal M 7: Transportation networks that minimize negative impacts to the environment and communities.

Policy M 7.3*:* Encourage the use of sustainable transportation facilities and infrastructure technologies, such as liquid and compressed natural gas, and hydrogen gas stations, ITS, and electric car plug-in ports

Los Angeles County 2045 Climate Action Plan

The County's Board of Supervisors adopted the Los Angeles County 2045 Climate Action Plan (2045 CAP) on June 25, 2024 (LA County 2024). The 2045 CAP is an update to the Unincorporated Los Angeles County Community Climate Action Plan (CCAP) 2020 and sets new GHG emissions reduction targets for 2030 (40 percent below 2015 levels), 2035 (50 percent below 2015 levels), and 2045 (83 percent below 2015 levels) consistent with State goals and sets a long-term aspirational goal for carbon neutrality by 2045 (LA County 2024). The 2045 CAP includes five categories for GHG emissions reductions: (1) energy supply, (2) transportation, (3) building energy and water, (4) waste, and (5) agriculture, forestry, and other land uses (LA County 2023). Refer to Section 3.8, Greenhouse Gas Emissions, for additional details.

3.6.4 Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, the Proposed Project could have a significant impact related to energy if it would:

- Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation (see Impact 3.6-1, below).
- Conflict with or obstruct a state or local plan for renewable energy or energy efficiency (see Impact 3.6-2, below).

3.6.5 Impact Analysis

Energy Resources

Impact 3.6-1: The Specific Plan Program and Proposed Project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources, during construction or operation, and the Specific Plan Program and Proposed Project would result in less than significant and less than cumulatively considerable impacts on energy resources.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Final PEIR Section 3.13, *Utilities and Service Systems*, included an energy utility system capacity analysis that assessed the energy demand of the buildout associated with the Specific Plan Program. The analysis identified that all future development under the Specific Plan would be subject to state energy efficiency regulations such as CALGreen and Title 24 energy standards. Furthermore, the Final PEIR notes that the buildout of the Specific Plan Program area would not create energy utility system capacity problems or require new or expanded entitlements. Thus, it was concluded that impacts related to energy infrastructure and services would be less than significant.

Cumulative

The Final PEIR discussed cumulative impacts relating to energy, noting that individual developments under the Specific Plan Program would involve energy consumption typical for urban infill development, and no operational activities would result in extraordinary energy

consumption. The Final PEIR determined that there would not be a significant demand on regional energy infrastructure, there would not be energy utility system capacity problems, and the development of the Specific Plan Program would not result in the construction of new energy facilities or expansion of existing facilities or entitlements. As a result, the Final PEIR concluded that the Specific Plan Program's contribution to cumulative impacts related to the energy infrastructure system and entitlements would be less than cumulatively considerable.

Proposed Project Evaluation

Proposed Project-Specific

An energy analysis that includes the quantification of energy demand for the Proposed Project was prepared. The energy assumptions and modeling data are provided in Appendix E of this Addendum to Final PEIR.

Construction

The Proposed Project's construction activities would consume energy primarily in the form of transportation fuels (e.g., diesel and gasoline) used by haul trucks, heavy-duty equipment, and worker vehicles traveling to and from construction areas. Electricity consumed during construction would result from electricity necessary for a construction office, water conveyance for dust control, and electric-powered equipment. Natural gas is generally not used during construction and is not expected to be used in any meaningful quantity for the Proposed Project.

Construction activities and associated energy use could vary substantially from day to day, depending on the phase and type of construction activity and the number of workers and vendors traveling to the construction areas. The assumptions used for this analysis regarding the construction schedule, and regarding the types, number, and level of usage of construction equipment and vehicles for each activity, are consistent with the assumptions used for the air quality and GHG emissions analyses in this Addendum to Final PEIR.

As discussed in Section 3.0.4, Approach to Environmental Analysis, a reasonable worst-case construction schedule for the individual development areas have been considered for analysis of construction and operational impacts. The construction schedule is provided in Table 3.0-2 and a more detailed breakdown of the construction phases (i.e., demolition, clearing, grading, building construction, architectural coating, and paving) is provided in the Proposed Project assumptions in Appendix C of this Addendum to Final PEIR. The reasonable worst-case construction assumption for full buildout of the Proposed Project includes approximately 11 years starting in 2025 and ending in 2036. **Table 3.6-2,** *Proposed Project Construction Energy Usage*, identifies the anticipated energy usage during the Proposed Project's construction.

For comparison purposes only, and not for the purpose of determining significance, the annual average fuel usage for would represent less than 0.0004 percent of the 2022 annual on-road gasoline consumption, approximately 0.009 percent of the 2022 diesel fuel-related energy consumption in Los Angeles County (CEC 2023). The Proposed Project's electricity consumption during construction would represent approximately 0.00024 percent of the total electricity provided by SCE (SCE 2024b).

TABLE 3.6-2
PROPOSED PROJECT CONSTRUCTION ENERGY USAGE

Energy Type	Total Quantity[a,b]	Annual Average Quantity During Construction[b]
Electricity		
Construction Office	466.2 MWh	40.9 MWh
Electricity from Water (Dust Control)	288.1 MWh	25.3 MWh
Electric Construction Equipment[c]	127.1 MWh	11.2 MWh
Total Electricity	**883.1 MWh**	**193.3 MWh**
Gasoline		
On-Road Construction Vehicles	125,437 gallons	11,014 gallons
Total Gasoline	**125,437 gallons**	**11,014 gallons**
Diesel		
On-Road Construction Vehicles	113,065 gallons	9,928 gallons
Off-Road Construction Equipment	344,539 gallons	30,252 gallons
Total Diesel	**457,604 gallons**	**40,179 gallons**

NOTES:
a. Detailed calculations are provided in Appendix C.
b. Totals may not add up due to rounding of decimals.
c. The modeling assumptions include electric construction equipment that would be utilized for one year of construction. The annual average quantity for electric construction equipment represents an average value over the approximately 11-year construction duration. However, the total quantity for electric construction equipment may occur in a single year.

SOURCES: ESA 2024; CalEEMod 2022, EMFAC 2021

Construction would utilize energy only for necessary on-site activities and to transport construction materials to and from the Project site. Construction equipment would comply with applicable idling restrictions and the use of cleaner, energy-efficient equipment that meet equipment engine standards, as discussed above in Subsection 3.6.3, *Regulatory Setting*, which would contribute to less fuel combustion and energy consumption and reduce the Proposed Project's construction-related energy use. Thus, the Proposed Project would not result in the wasteful, inefficient, and unnecessary consumption of energy, and impacts associated with transportation fuels for construction would be less than significant.

Operation

During operation of the Proposed Project, energy would be consumed for multiple purposes, including, but not limited to HVAC, lighting, and the use of electronics, equipment, and appliances. Energy would also be consumed during Proposed Project operations related to water usage, solid waste disposal, and vehicle trips. **Table 3.6-3,** *Proposed Project Operational Energy Usage*, displays the Proposed Project's energy demand from electricity, natural gas, gasoline, and diesel.

TABLE 3.6-3
PROPOSED PROJECT OPERATIONAL ENERGY USAGE

Energy Type	Annual Quantity[a,b]
Electricity	
Project Site Energy	5,068 MWh
Water Conveyance and Treatment	205 MWh
Proposed Project Subtotal	*5,273 MWh*
Natural Gas	
Building Usage	8,498,980 cf
Transportation	
Gasoline	185,185 gallons
Diesel	36,515 gallons

NOTES:
MWh = megawatt-hours; cf = cubic feet.
a. Detailed calculations are provided in Appendix C.
b. Totals may not add up due to rounding of decimals.
SOURCE: ESA 2024

Electricity

Proposed Project operations will increase the demand for electricity resources including water supply, conveyance, distribution, and treatment. In total, the Proposed Project would require an increase in energy of approximately 5,273 MWh per year. SCE has projected that annual electricity sale to customers in 2036 would be approximately 104,335 GWh (CEC 2024b). The Proposed Project represents approximately 0.005 percent of the SCE's projected network sales for 2036. Under peak conditions, the net increase of approximately 5,273 MWh on an annual basis would generally be equivalent to a peak of 0.6 to 1.2 MW (assuming 8,760 hours or 4,380 hours per year of active electricity demand). In comparison to the SCE power grid base peak demand of 26,917 MW for 2036, the net increase would represent approximately 0.002 to 0.004 percent of the SCE base peak load conditions.

The Proposed Project would comply with the applicable provisions of the Title 24 standards and the CALGreen Code in effect at the time of building permit issuance for energy efficiency. Therefore, the operation of the Proposed Project would not result in the wasteful, inefficient, and unnecessary consumption of electricity and impacts related to electricity consumption would be less than significant.

Natural Gas

The Proposed Project's operation would increase the demand for natural gas. As shown in Table 3.6-3, the operation of the Proposed Project is estimated to consume approximately 8,498,980 cubic feet of natural gas annually. The Proposed Project would comply with the applicable provisions of the Title 24 standards and the CALGreen Code in effect at the time of building permit issuance for energy efficiency.

SoCalGas accounts for anticipated regional demand based on various factors, including growth in employment by economic sector, growth in housing and population, and increasingly demanding State goals for reducing GHG emissions. SoCalGas accounts for an increase in employment and housing between 2018 to 2035. Furthermore, the 2024 California Gas Report estimates that natural gas demand within SoCalGas' planning area will be 739,855 million cf in 2035 (SoCalGas 2024b). Projected demand of natural gas in 2035 was used, as this was the nearest available data year to the Proposed Project's buildout year. As stated above, the Proposed Project's annual net increase in demand for natural gas is estimated to be 8.5 million cf in year 2035. The Proposed Project would account for 0.001 percent of the 2035 forecasted annual consumption in SoCalGas' planning area and would fall within SoCalGas' projected consumption for the area and would be consistent with SoCalGas' anticipated regional demand from population or economic growth.

As would be the case with electricity, the Proposed Project would comply with the applicable provisions of Title 24 and the CALGreen Code in effect at the time of building permit issuance to minimize natural gas demand. As such, the Proposed Project would minimize energy demand. Therefore, with the incorporation of these provisions required in existing regulations, operation of the Proposed Project would not result in wasteful, inefficient, or unnecessary consumption of natural gas.

Transportation Energy

The Proposed Project's estimated operational transportation fuel demand is provided in Table 3.6-3. During operation, the Proposed Project-related traffic would result in the consumption of petroleum-based fuels related to vehicular travel to and from the completed Project site. As summarized in Table 3.6-3, the Proposed Project's estimated net increase in petroleum-based fuel usage would be 185,185 gallons of gasoline and 36,515 gallons of diesel per year.[2] The Proposed Project's annual average fuel usage would represent approximately 0.006 percent of the 2022 annual on-road gasoline and approximately 0.008 percent of the 2022 annual diesel fuel-related energy consumption in Los Angeles County (CEC 2023). The Proposed Project is located in an area accessible to public transportation options and within a Transit Priority Area (TPA) as defined by SCAG, which means within one-half mile from major transit stops and high-quality transit corridors. The Proposed Project is located in proximity to the Metro Rosa Parks/Willowbrook Station and, as such, encourages and promotes public transportation ridership for Proposed Project residents, visitors, and employees and reduces automobile travel to the Project site reducing VMT and associated transportation fuel-demand. Therefore, the Proposed Project would result in negligible fuel usage compared to Countywide fuel consumption. Further, the proximity to high quality transit that encourages sustainable methods of transportation, would ensure that operation of the Proposed Project would not result in wasteful, inefficient, or unnecessary consumption of transportation fuel.

[2] Annual fuel usage was based on the VMT calculated within CalEEMod and corresponding percent fuel type mix from EMFAC2021 On-road Emissions.

Cumulative

Cumulative development within the vicinity of the Project site would include uses that would involve energy consumption quantities that would be typical for urban infill development. No operational activities or land uses would occur that would result in extraordinary energy consumption. Because the Proposed Project would not result in substantial consumption of energy relative to Countywide consumption and would be consistent with state and local regulations, the Proposed Project's impact on energy resources within the Proposed Project vicinity would be less than cumulatively considerable.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project would not result in the wasteful, inefficient, or unnecessary use of energy resources, and impact on energy resources would be less than significant. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Conflict with State or Local Energy Plan

Impact 3.6-2: The Specific Plan Program and Proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and therefore, the Specific Plan Program and the Proposed Project would result in less than significant and less than cumulatively considerable impacts on state and local energy plans.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Final PEIR stated that all future development within the Specific Plan Program area would be subject to the state energy efficiency regulations pursuant to the California Building Code (CBC). The Final PEIR notes that new development under the Specific Plan Program would be required to meet Title 24 energy and CALGreen energy efficiency standards. Compliance with these regulations would result in reductions in energy demand and promote sustainable building designs and features. Therefore, the Proposed Project would result in less than significant impacts related to a state or local energy plan.

Cumulative

The Final PEIR stated that in order for projects to have less than significant impacts in regards to energy, they would be required to comply with existing state regulations and required to meet the Title 24 and CALGreen Energy efficiency standards. Further, it was noted that additional measures could provide additional reductions in energy consumption, such as the use of solar

panels, sky lights, or other LEED-type energy efficiency infrastructure. With implementation of the existing energy conservation regulations and additional energy reduction measures, the Final PEIR stated that the cumulative impacts to energy would be less than significant. Because the Specific Plan Program would include uses that would comply with Title 24 and CalGreen Energy efficiency standards, the Proposed Project's impact on state and local energy plans would be less than cumulatively considerable and less than significant.

Proposed Project Evaluation

Proposed Project-Specific

Construction of the Proposed Project would utilize fuel-efficient trucks and equipment consistent with federal and State regulations discussed above, such as the anti-idling regulation in accordance with CCR, Title 13, Section 2485, and fuel requirements in accordance with CCR, Title 17, Section 93115, as well as the In-Use Off-Road Diesel-Fueled Fleets regulation (13 CCR, Section 2449). As such, the Proposed Project would comply with State measures to reduce the inefficient, wasteful, and unnecessary consumption of energy, such as petroleum-based transportation fuels. While these regulations are intended to reduce construction emissions, compliance with the anti-idling and emissions regulations discussed above would also result in fuel savings from the use of more fuel-efficient engines. Compliance with requirements for diversion of mixed construction debris would reduce truck trips to landfills, which are typically located some distance away from population centers, and increase the amount of waste recovered (i.e., recycled, reused) at material recovery facilities.

Transportation fuels (gasoline and diesel) are produced from crude oil, which can be domestic or imported from various regions around the world. Based on current proven reserves, crude oil production would be sufficient to meet worldwide demand for liquid fuels through 2050 (EIA 2023b). Vehicles that would be used by construction workers would comply with CAFE fuel economy standards, which would result in more efficient use of transportation fuels (lower consumption). Additionally, off-road emissions standards will increase equipment efficiencies as they are phased-in overtime and less-efficient equipment is phased out of construction fleets. These limitations would result in an increase in energy savings in the form of reduced fuel consumption from more fuel-efficient engines. Although these requirements are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in the efficient use of construction-related energy. Additionally, the Project site is ideally located to encourage use of alternative transportation options, with the Metro Rosa Parks/Willowbrook Station within less than half a mile and several bus stations in the area. The Proposed Project design would include locations for bike parking for residents and occupants in accordance with the Los Angeles County Code in effect at the time of building permit issuance. This would support the 2024 Connect SoCal Plan's sustainable transportation goals aimed at reducing VMT within the region. Thus, based on the information above, construction and operation of the Proposed Project would comply with existing energy standards.

As discussed previously, the Proposed Project would comply with the applicable provisions of the Title 24 standards and the CALGreen Code in effect at the time of building permit issuance. The Proposed Project would be designed to include numerous energy-saving features that would allow the Proposed Project to comply with the Title 24 standards and achieve energy savings required

by state regulations in effect at the time of building permit issuance. The facilities proposed as part of the Proposed Project would promote energy conservation, include on-site renewable energy solar facilities, and provide electric vehicle charging stations, in accordance with the policies AQ 3.5, AQ 3.6, C/NR 12.1, LU 11.1, and M 7.3 of the Los Angeles County General Plan.

The land uses and features proposed as part of the Proposed Project would also promote the goals of the OurCounty Los Angeles Countywide Sustainability Plan. The Proposed Project would support several of the overarching goals of OurCounty Los Angeles Countywide Sustainability Plan, including the expansion of equitable development without displacement, providing public spaces for recreation, and encouraging resilient and healthy community environments where residents can thrive. More specifically, the Proposed Project would locate affordable housing near existing and future public transit, have on-site renewable energy solar facilities, provide electric vehicle charging stations, and adhere to all applicable provisions of the CALGreen and Title 24 standards in effect at the time of building permit issuance. Implementation of the Proposed Project's sustainable design features would help to support the OurCounty Los Angeles Countywide Sustainability Plan Strategies 1C, 2B, 3A, 3B, 3C, 6A, 6B, 6C, 7B, and 9C that would result in energy savings throughout the County.

The County recently adopted its 2045 CAP, which proposes strategies to increase renewable energy production and improve energy efficiency. The 2045 CAP also aligns with the goals of the OurCounty Sustainability Plan. The 2045 CAP also includes strategies to reduce energy use in buildings and decarbonize the energy that is used, reduce indoor and outdoor water consumption, and increase the supply of energy to communities with zero-carbon or low-carbon electricity. Specifically, the 2045 CAP aims to reduce electricity use through requiring renewable energy for affordable housing developments (Measure ES3.5); locate residential and community-serving uses in high quality transit areas (Measure T1.1); require all new development to install EV charging stations (Measure T6.3); and utilize water conservation in conjunction with Leadership in Energy and Environmental Design (LEED) standards (Measure E 6.1), all of which would support the State's energy efficiency and renewable energy goals.

Overall, the Proposed Project's features would support and promote the use of renewable energy and energy efficiency through compliance with CALGreen, Title 24 requirements, OurCounty Los Angeles Countywide Sustainability Plan, the County of Los Angeles 2045 CAP, and regional and local general plan policies in effect at the time of building permit issuance, and as with the Proposed Project, would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, the Proposed Project impacts would be less than significant.

Cumulative

Implementation of cumulative projects would increase development within the County of Los Angeles. Future development in the County of Los Angeles would be required to comply with state and local plans for renewable energy or energy efficiency, including the Title 24 standards, CALGreen Code, OurCounty Los Angeles Countywide Sustainability Plan, the County of Los Angeles 2045 CAP, or the goals of the 2024–2050 RTP/SCS with respect to sustainable transportation and energy use, as applicable to the cumulative projects. Since the Proposed

Project would not conflict with the Title 24 standards, CALGreen Code, OurCounty Los Angeles Countywide Sustainability Plan, the County of Los Angeles 2045 CAP, or the goals of the 2024–2050 RTP/SCS with respect to sustainable transportation and energy use, the Proposed Project's contribution to cumulative impacts with respect to potentially significant environmental impacts due to conflicts with or obstruction of a state or local plan for renewable energy or energy efficiency would be less than cumulatively considerable.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and the Proposed Project's impact on energy resources would be less than significant. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

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3.7 Geology and Soils

3.7.1 Introduction

This section addresses current geology and soils conditions, and the potential of the Proposed Project to result in impacts associated with fault rupture, strong seismic ground shaking, liquefaction, landslides, soil erosion or loss of topsoil, unstable geologic location, expansive soils, and wastewater disposal systems. This section includes an update of the environmental setting on and in the vicinity of the Project site and identifies any applicable changes to the geology and soils conditions that may have occurred since the certification of the Final PEIR. In addition, a brief summary of the regulatory setting included in the Final PEIR and any substantive revisions to the regulatory setting that has occurred since the certification of the Final PEIR. This section also includes the thresholds of significance and a brief summary of the impacts associated with geology and soils and mitigation measures addressed in the Final PEIR as well as the potential geology and soils impacts associated with the Proposed Project. Finally, this section provides a conclusion of whether (1) the Proposed Project includes substantial changes that would require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact related to geology and soils; (2) substantial changes in the circumstances under which the Proposed Project is undertaken would require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact related to geology and soils; or (3) new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3) exist related to geology and soils.

The geology and soils analysis of the Proposed Project is based on the Geotechnical Engineering Investigation (Geotechnical Report) prepared by Geotechnologies, Inc. dated November 11, 2021. The report is located in Appendix D of this Addendum to Final PEIR.

The Geotechnical Report provides more detailed evaluations that includes borings to characterize the subsurface conditions and detailed recommendations for general earthwork, grading and structural design compared to the general assessment provided in the Final PEIR for the Specific Plan Program.

3.7.2 Environmental Setting

Regional Geologic Setting

The Project site is located within the Los Angeles Basin. The Los Angeles Basin is located at the northern end of the Peninsular Ranges Geomorphic Province. The basin is bounded by the east and southeast by the Santa Ana Mountains and San Joaquin Hills, to the northwest by the Santa Monica Mountains. Over 22 million years ago the Los Angeles basin was a deep marine basin formed by tectonic forces between the North American and Pacific plates. Since that time, over 5 miles of marine and non-marine sedimentary rock as well as intrusive and extrusive igneous rocks have filled the basin. During the last 2 million years, defined by the Pleistocene and Holocene epochs, the Los Angeles basin and surrounding mountain ranges have been uplifted to form the

present-day landscape. Erosion of the surrounding mountains has resulted in deposition of unconsolidated sediments in low-lying areas by rivers such as the Los Angeles River. Areas that have experienced subtle uplift have been eroded with gullies (Geotechnologies, 2021).

Regional Faulting and Seismicity

Based on criteria established by the California Division of Mines and Geology (CDMG) now called California Geologic Survey (CGS), faults may be categorized as Holocene-active, Pre-Holocene faults, and Age-undetermined faults. Holocene-active faults are those which show evidence of surface displacement within the last 11,700 years. Pre-Holocene faults are those that have not moved in the past 11,700 years. Age-undetermined faults are faults where the recency of fault movement has not been determined.

Buried thrust faults are faults without a surface expression but are a significant source of seismic activity. They are typically broadly defined based on the analysis of seismic wave recordings of hundreds of small and large earthquakes in the southern California area. Due to the buried nature of these thrust faults, their existence is usually not known until they produce an earthquake. The risk for surface rupture potential of these buried thrust faults is inferred to be low. However, the seismic risk of these buried structures in terms of recurrence and maximum potential magnitude is not well established. Therefore, the potential for surface rupture on these surface-verging splays at magnitudes higher than 6.0 cannot be precluded (Geotechnologies, 2021).

Surface Rupture

In 1972, the Alquist-Priolo Special Studies Zones Act (now known as the Alquist-Priolo Earthquake Fault Zoning Act) was passed into law. As revised in 2018, The Act defines “Holocene-active” Faults utilizing the same aging criteria as that used by California Geological Survey (CGS). However, established state policy has been to zone only those faults which have direct evidence of movement within the last 11,700 years. It is this recency of fault movement that the CGS considers as a characteristic for faults that have a high potential for ground rupture in the future.

CGS policy is to delineate a boundary from 200 to 500 feet wide on each side of the Holocene-Active fault trace based on the location precision, the complexity, or the regional significance of the fault. If a site lies within an Earthquake Fault Zone, a geologic fault rupture investigation must be performed that demonstrates that the proposed building site is not threatened by surface displacement from the fault before development permits may be issued.

Ground rupture is defined as surface displacement which occurs along the surface trace of the causative fault during an earthquake. Based on research of available literature and results of site reconnaissance, no known Holocene-active or Pre-Holocene faults underlie the Project site. In addition, the Project site is not located within an Alquist-Priolo Earthquake Fault Zone. The nearest active fault to the Project site is the Newport-Inglewood fault located approximately 1.5 miles to the southwest. The historically active San Andreas Fault is located approximately 42 miles north of the Project site. Based on these considerations, the potential for surface ground rupture at the Project site is considered low (Geotechnologies, 2021).

Liquefaction

Liquefaction is a phenomenon in which saturated silty to cohesionless soils below the groundwater table are subject to a temporary loss of strength due to the buildup of excess pore pressure during cyclic loading conditions such as those induced by an earthquake. Liquefaction-related effects include loss of bearing strength, amplified ground oscillations, lateral spreading, and flow failures.

The Seismic Hazards Zone Map of the South Gate Quadrangle by the State of California, indicates that the Project site is located within an area designated as "Liquefiable." This determination is based on groundwater depth records, soil type and distance to a fault capable of producing a substantial earthquake (Geotechnologies, 2021).

Groundwater was encountered between 50.5 and 55 feet below site grades during exploration. According to the Seismic Hazard Zone Report for the South Gate 7½-Minute Quadrangle, the historically highest groundwater level is at approximately 9 feet below the ground surface.

Lateral Spreading

Lateral spreading is the most pervasive type of liquefaction-induced ground failure. During lateral spread, blocks of mostly intact, surficial soil displace downslope or towards a free face along a shear zone that has formed within the liquefied sediment.

Landslides

The probability of seismically-induced landslides occurring on the Project site is considered low due to the lack of elevation differences across and adjacent to the Project site.

3.7.3 Regulatory Setting

State

Alquist-Priolo Earthquake Fault Zoning Act

Alquist-Priolo Earthquake Fault Zoning Act (formerly the Alquist-Priolo Special Studies Zone Act) of 1972 (revised in 1994) is the State law that addresses hazards from earthquake fault zones. The purpose of this law is to mitigate the hazard of surface fault rupture by regulating development near active faults. As required by the Act, the State has delineated Earthquake Fault Zones (formerly Special Studies Zones) along known active faults in California (CGS, 2015). The nearest Alquist-Priolo Earthquake Fault to the Project site is the Newport-Inglewood Fault.

Seismic Hazard Mapping Act

The Seismic Hazards Mapping Act was passed in 1990 following the Loma Prieta earthquake to reduce threats to public health and safety and to minimize property damage caused by strong ground shaking, liquefaction, landslides, or other hazards caused by earthquakes. This act requires the State Geologist to delineate various seismic hazard zones, and cities, counties, and other local permitting agencies to regulate certain development projects within these zones. Before a development permit is granted for a site within a seismic hazard zone, a geotechnical investigation must be conducted, and appropriate mitigation measures incorporated into the

project's design. For projects that would locate structures for human occupancy within designated Zones of Required Investigation, the Seismic Hazards Mapping Act requires project applicants to perform a site-specific geotechnical investigation to identify the potential site-specific seismic hazards and corrective measures, as appropriate, prior to receiving building permits. The California Geological Survey (CGS) Guidelines for Evaluating and Mitigating Seismic Hazards (CGS, 2008) provides guidance for evaluating and mitigating seismic hazards.

California Building Code

The California Building Code (CBC) has been codified in the California Code of Regulations (CCR) as Title 24, Part 2. Title 24 is administered by the California Building Standards Commission, which, by law, is responsible for coordinating all building standards. Under state law, all building standards must be centralized in Title 24, or they are not enforceable. The purpose of the CBC is to establish minimum standards to safeguard the public health, safety and general welfare through structural strength, means of egress facilities, and general stability by regulating and controlling the design, construction, quality of materials, use and occupancy, location, and maintenance of all buildings and structures within its jurisdiction. Since the certification of the Final PEIR, the CBC has been updated. The 2022 edition of the CBC is based on the 2021 International Building Code (IBC) published by the International Code Council. The code is updated triennially, and the 2022 edition of the CBC was published by the California Building Standards Commission in 2022 and took effect starting January 1, 2023.

Chapter 18 of the CBC covers the requirements of geotechnical investigations (Section 1803), including excavation, grading, and fills (Section 1804). The CBC requires geotechnical investigations be conducted prior to construction unless waived by the designated building official (which could occur when satisfactory data from adjacent areas demonstrates an investigation is not necessary). Chapter 18 also describes analysis of expansive soils and the determination of the depth to groundwater table. Previously, the Thresholds of Significance in Appendix G of the CEQA Guidelines stated that expansive soil would be characterized as defined in Table 18-1-B of the 1994 Uniform Building Code. However, that table is no longer used, and the current CBC definition is as follows:

> **1803.5.3 Expansive Soil.** In areas likely to have expansive soil, the building official shall require soil tests to determine where such soils do exist. Soils meeting all four of the following provisions shall be considered expansive, except that tests to show compliance with Items 1, 2 and 3 shall not be required if the test prescribed in Item 4 is conducted:
>
> 1. Plasticity index (PI) of 15 or greater, determined in accordance with ASTM D 4318
> 2. More than 10 percent of the soil particles pass a No. 200 sieve (75 micrometers), determined in accordance with ASTM D 422
> 3. More than 10 percent of the soil particles are less than 5 micrometers in size, determined in accordance with ASTM D 422
> 4. Expansion index greater than 20, determined in accordance with ASTM D 4829

The CBC also includes earthquake design requirements that consider the occupancy category of the structure, site class, soil classifications, and various seismic coefficients which are used to determine a Seismic Design Category (SDC) for a project. The SDC is a classification system that combines the occupancy categories with the level of expected ground motions at the site and ranges from SDC A (very small seismic vulnerability) to SDC E (very high seismic vulnerability and near a major fault). Design specifications for individual projects are then determined according to the SDC.

NPDES Construction General Permit

The State of California adopted a Statewide NPDES Permit for General Construction Activity (Construction General Permit) on September 2, 2009 (Order No. 2009-0009-DWQ), which has since been amended by Order Nos. 2010-0014-DWQ and 2012-0006-DWQ. The Construction General Permit regulates construction site storm water. Dischargers whose projects disturb one or more acres of soil, or whose projects disturb less than one acre but are part of a larger development plan that in total disturbs one or more acres, are required to obtain coverage under the Construction General Permit for discharges of storm water associated with construction activity. Construction activity subject to this permit includes clearing, grading, and disturbances to the ground, such as stockpiling or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility.

The Construction General Permit requires the development and implementation of an SWPPP that includes specific BMPs designed to prevent pollutants from contacting stormwater and being transported off-site into receiving waters. Types of BMPs include erosion control (e.g., preservation of vegetation), sediment control (e.g., fiber rolls), non-stormwater management (e.g., water conservation), and waste management. The SWPPP also includes descriptions of BMPs to reduce pollutants in storm water discharges after all construction phases have been completed at the site (post-construction BMPs). Routine inspection of all BMPs is required under the provisions of the Construction General Permit. In addition, the SWPPP is required to include a visual monitoring program, a chemical monitoring program for nonvisible pollutants, and a sediment monitoring plan if the site discharges directly to a water body listed on the 303(d) list for sediment.

In the project area, the Construction General Permit is implemented and enforced by the Los Angeles Regional Water Quality Control Board (LARWQCB), which administers the stormwater permitting program. Dischargers are required to electronically submit a Notice of Intent (NOI) and permit registration documents (PRDs) to obtain coverage under this Construction General Permit. Dischargers are responsible for notifying the LARWQCB of violations or incidents of noncompliance, as well as for submitting annual reports identifying deficiencies of the BMPs and how the deficiencies were corrected.

Local

County of Los Angeles Municipal Separate Storm Sewer System Permit

The current Municipal Separate Storm Sewer System (MS4) Permit for County of Los Angeles (Order No. R4-2012-0175) was adopted on November 8, 2012, became effective December 28, 2012, and will expire on December 28, 2017. Order No. R4-2012-0175 is the fourth iteration of the storm water permit for the MS4s in the Los Angeles region, which includes: Los Angeles County Flood Control District, County of Los Angeles, and 84 incorporated cities within the County watersheds excluding the City of Long Beach. The permit contains requirements that are necessary to improve efforts to reduce the discharge of pollutants in storm water runoff to the maximum extent practicable (MEP) and achieve water quality standards. This permit requires that runoff be addressed during the major phases of urban development (planning, construction, and operation) in order to reduce the discharge of pollutants from storm water to the MEP, effectively prohibit non-storm water discharges and protect receiving waters.

The MS4 Permit also includes construction requirements for implementation of minimum construction site BMPs for erosion, sediment, non-storm water management and waste management on construction sites.

County of Los Angeles General Plan

Following are the relevant policies from the Los Angeles County General Plan (County of Los Angeles, 2015)

General Plan—Conservation and Natural Resources Element

Goal – C/NR-5: Protected and useable local surface water resources.

Policy C/NR 5.1: Support the LID philosophy, which seeks to plan and design public and private development with hydrologic sensitivity, including limits to straightening and channelizing natural flow paths, removal of vegetative cover, compaction of soils, and distribution of naturalistic BMPs at regional, neighborhood, and parcel-level scales.

Policy C/NR 5.2: Require compliance by all County departments with adopted Municipal Separate Storm Sewer System (MS4), General Construction, and point source NPDES permits.

Policy C/NR 5.4: Actively engage in implementing all approved Enhanced Watershed Management Programs/Watershed Management Programs and Coordinated Integrated Monitoring Programs/Integrated Monitoring Programs or other County-involved TMDL implementation and monitoring plans.

General Plan—Safety Element

Goal – S 1: An effective regulatory system that prevents or minimizes personal injury, loss of life and property damage due to seismic and geotechnical hazards.

Policy S 1.1: Discourage development in Seismic Hazard and Alquist-Priolo Earthquake Fault Zones.

Policy S 1.2: Prohibit the construction of most structures for human occupancy adjacent to active faults until a comprehensive fault study that addresses the potential for fault rupture has been completed.

County of Los Angeles Low Impact Development Manual

The County of Los Angeles (County) prepared the 2014 Low Impact Development Standards Manual (LID Standards) to comply with the requirements of the National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Permit for stormwater and non-stormwater discharges from the MS4 within the coastal watersheds of Los Angeles County (CAS004001, Order No. R4-2012-0175), referred to as the 2012 MS4 Permit (County of Los Angeles, 2014). The LID Standards included in the February 2014 Low Impact Development Standards Manual provide guidance for the implementation of stormwater quality control measures in new development and redevelopment projects in unincorporated areas of the County with the intention of improving water quality and mitigating potential water quality impacts from stormwater and non-stormwater discharges (County of Los Angeles, 2014).

The LID Manual specifies requirements for development as mandated by the Ordinance. According to the Manual, liquefaction-induced settlement of structures and lateral spreading will need to be evaluated if analyses indicate the potential for liquefaction may increase due to stormwater runoff infiltration. Further, soil amendments must be implemented to avoid potential geotechnical hazards such as liquefaction if the hydraulic conductivity in the soil is not sufficient for the necessary water application rate.

3.7.4 Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines and the County of Los Angeles Environmental Checklist Form, the project could have a significant impact related to geology and soils if it would:

- Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
  - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42 (see Impact 3.7-1, below).
  - Strong seismic ground shaking (see Impact 3.7-2, below).
  - Seismic-related ground failure, including liquefaction (see Impact 3.7-3, below).
  - Landslides (see Impact 3.7-4, below).
- Result in substantial soil erosion or the loss of topsoil (see Impact 3.7-5, below).
- Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse (see Impact 3.7-6, below).
- Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property (see Impact 3.7-7, below).

- Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of wastewater (see Impact 3.7-8).
- Conflict with the Hillside Management Area Ordinance (L.A. County Code, Title 22, Chapter 22.104) (see Impact 3.7-9, below).

3.7.5 Impact Analysis

Fault Rupture

Impact 3.7-1: The Specific Plan Program and Proposed Project would result in no impacts and no cumulative exposure of people or structures to adverse effects, including the risk of loss, injury or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the Project site or based on other substantial evidence of a known fault.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Initial Study/Notice of Preparation and Final PEIR identified that seismically-induced ground rupture is defined as the physical displacement of surface deposits in response to an earthquake's seismic waves. The magnitude, sense, and nature of fault rupture can vary for different faults or even along different strands of the same fault. Ground rupture is considered more likely among active faults. The Los Angeles Basin contains both active and potentially active faults and is considered a region of high seismic activity. The Specific Plan Program area is not located within or adjacent to an Alquist-Priolo Fault Rupture Hazard Zone fault and is, therefore, unlikely to experience surface fault rupture (California Department of Conservation [DOC], 2015; County of Los Angeles, 2014). The closest active fault to the Specific Plan Program area is the Newport-Inglewood Fault located approximately 1.8 miles southwest of the Specific Plan Program area (USGS, 2015). Due to the distance between the Specific Plan Program area and the active fault, the Specific Plan Program area would not result in impacts related to the rupture of a known earthquake fault.

Cumulative

The Final PEIR did not address the cumulative impact on fault ruptures since the Specific Plan Program area is not located within an Alquist-Priolo site, earthquake fault zone, or quaternary fault that would result in fault ruptures. Therefore, the Specific Plan Program would result in no impacts to geologic hazards such as fault ruptures and would not contribute a cumulative considerable impact.

Proposed Project Evaluation

Proposed Project-Specific

As discussed in the Geotechnical Report prepared for the Proposed Project by Geotechnologies, Inc., in November 2021, there are no known Holocene-active or pre-Holocene faults underlying the Project site. Additionally, according to the Department of Conservation, Alquist-Priolo Site Investigation Reports, the Project site is not underlain or adjacent to an Alquist-Priolo site, and

earthquake fault zone, or quaternary faults (DOC, 2024). Furthermore, the Project site is not located within an Alquist-Priolo Earthquake Fault Zone and therefore, the potential for surface ground rupture at the Project site is considered low. Thus, the Proposed Project would not expose people or structures to fault rupture impacts.

Cumulative

As with the Specific Plan Program, the Proposed site is not located within an Alquist-Priolo site, earthquake fault zone, or quaternary fault that would result in a geologic hazard such as fault ruptures. Additionally, geologic hazards are specific to individual sites and hazards present on one site do not add to the hazards present on another site. Therefore, based on the above, the Proposed Project would not result impacts to geologic hazards such as fault ruptures and would not contribute to cumulative geological hazards such as fault ruptures.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the implementation of the Proposed Project would not result in geologic hazards related to fault ruptures. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Strong Seismic Ground Shaking

Impact 3.7-2: The Specific Plan Program and Proposed Project would have a less than significant and less than cumulatively considerable impact to the exposure of people or structures to adverse effects, including the risk of loss, injury or death involving strong seismic ground shaking.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

As discussed in the Final PEIR, the Specific Plan Program area is located in a seismically active region and is located in the near vicinity of the active Newport-Inglewood fault. People and structures within the Specific Plan Program area could be subject to strong seismic ground shaking. However, conforming to the California Building Code (CBC) and Uniform Building Code (UBC) would reduce impacts from strong seismic ground shaking to the maximum extent possible under currently accepted engineering practices. Therefore, the Specific Plan Program would result in less than significant impacts related to exposing people or structures to strong seismic ground shaking.

Cumulative

The study area for potential cumulative geology and soils impacts involving strong seismic ground shaking includes the Specific Plan Program area and areas immediately adjacent. People and structures within the Specific Plan Program area could be exposed to indirect hazards from unstable structures immediately adjacent to the Specific Plan Program area. Future cumulative development could be located in areas susceptible to strong seismic ground shaking similar to the Specific Plan Program area. Because future development could be exposed to geologic hazards including strong seismic ground shaking, people and structures could be exposed to a high potential for seismic ground shaking. However, compliance with the CBC and UBC would reduce impacts from strong seismic ground shaking for future cumulative development to the maximum extent possible under currently accepted engineering practices. Because the Specific Plan Program would result in less than significant impacts related to geologic hazards including strong seismic ground shaking, the Specific Plan Program's contribution to strong seismic ground shaking would be less than cumulative considerable, and therefore, less than cumulatively significant.

Proposed Project Evaluation

Proposed Project-Specific

As discussed above, the nearest active fault to the Project site is the Newport-Inglewood fault located approximately 1.5 miles to the southwest and the historically active San Andreas Fault is located approximately 42 miles north of the Project site. Since the Proposed Project is located within the Specific Plan Program area, it would also be located in a seismically active region and could be subject to strong seismic ground shaking. However, as with all structures constructed under the Specific Plan Program, the Proposed Project would be required to conform with the CBC and UBC, thus reducing impacts to the maximum extent feasible. Therefore, as with the Specific Plan Program, the Proposed Project would result in less than significant impacts related to exposing people or structures to strong seismic ground shaking.

Cumulative

Geological hazards are site-specific and are not cumulative in that developing on a site would not increase geological hazards on surrounding sites. Adherence by cumulative projects to the CBC and local regulations would reduce potential cumulative strong seismic ground shaking impacts to less than significant. Based on the above, the potential ground shaking impacts associated with the Proposed Project would be less than significant and would contribute a less than cumulative considerable impact related to geological hazards such as strong seismic ground shaking.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the implementation of the Proposed Project would result in less than significant geologic hazards impacts related to strong seismic ground shaking. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that

require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Liquefaction and Lateral Spreading

Impact 3.7-3: The Specific Plan Program and Proposed Project would have a less than significant and less than cumulatively impact to the exposure of people or structures to adverse effects, including the risk of loss, injury or death involving liquefaction and lateral spreading.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

As discussed in the Final PEIR, the Specific Plan Program would involve new development and redevelopment of several structures in an area classified as having high potential for liquefaction and liquefaction-induced lateral spreading. Although a certain depth at an individual site is not necessarily an indicator to the area-wide or regional depth to groundwater, and levels are variable, there are areas in the Specific Plan Program where the depth to groundwater is between 30 to 40 feet below the ground surface and therefore, are potentially susceptible to liquefaction during a moderate to high acceleration seismic shaking. However, conforming to the CBC would reduce impacts from liquefaction and liquefaction-induced lateral spreading within the Specific Plan Program area to the maximum extent possible under currently accepted engineering practices. Therefore, the implementation of the Specific Plan Program would result in less than significant impacts related to exposing people or structures to liquefaction and liquefaction-induced lateral spreading.

Cumulative

The study area for potential cumulative geology and soils impacts involving liquefaction and lateral spreading includes the Specific Plan Program area and areas immediately adjacent to the Specific Plan Program area because the direct geology and soil impacts are site specific and people and structures within the Specific Plan Program could be exposed to indirect hazards from unstable structures immediately adjacent to the Specific Plan Program area. Future cumulative development could be located in areas susceptible to liquefaction and lateral spreading similar to the Specific Plan Program. Because future development could be exposed to these impacts, people and structures could be exposed to a high potential for liquefaction and lateral spreading. However, compliance with the CBC and County ordinances would reduce potential impacts from liquefaction and liquefaction-induced lateral spreading for future cumulative development to the maximum extent possible under currently accepted engineering practices. Because the Specific Plan Program would result in less than significant impacts related to geologic hazards including liquefaction and liquefaction-induced lateral spreading, the Specific Plan Program's contribution to cumulative liquefaction and liquefaction-induced lateral spreading would be less than cumulatively considerable, and therefore, less than cumulatively significant.

Proposed Project Evaluation

Proposed Project-Specific

As discussed in the Geotechnical Report prepared for the Project site, the Seismic Hazards Zone Map of the South Gate Quadrangle by the State of California indicates that the Project site is located within an area designated as "Liquefiable." This determination is based on groundwater depth records, soil type and distance to a fault capable of producing a substantial earthquake. Additionally, based on the DOC Liquefaction Zones Map, the Project site is located within a Liquefaction Zone (DOC, 2022a). However, the Geotechnical Report's recommendation that the Proposed Project structures be supported by a mat foundation system would comply with the CBC and County ordinances to reduce potential liquefaction impacts to less than significant. Therefore, the Proposed Project would result in less than significant impact from the exposure of people and structures to liquefaction and liquefaction-induced lateral spreading.

Cumulative

As stated above, geological hazards are site-specific and are not cumulative in that developing on a site would not increase geological hazards on surrounding sites. Adherence by cumulative projects to the CBC and local regulations would reduce potential cumulative liquefaction impacts to less than significant. Because, the Proposed Project would have a less than significant impact related to exposing people or structures to liquefaction and liquefaction-induced lateral spreading, the Proposed Project's contribution to liquefaction and liquefaction-induced lateral spreading impacts would be less than cumulatively considerable, and therefore, less than cumulatively significant.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the implementation of the Proposed Project would result in less than significant geologic hazards related to liquefaction and liquefaction-induced lateral spreading with adherence of the CBC and local regulations. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Landslides

Impact 3.7-4: The Specific Plan Program and Proposed Project would result in no impact and no cumulatively considerable potential to expose people or structures to adverse effects, including the risk of loss, injury or death involving landslides would occur.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Initial Study/Notice of Preparation and Final PEIR stated that the Specific Plan Program area is a flat, level area with no hills or cliffs, where the risk of landslides is very low. As a result, impacts related to landslide hazards would not result from the implementation of the Specific Plan Program.

Landslides are one of the various types of downslope movements in which rock, soil, and other debris are displaced due to the effects of gravity. The potential for material to detach and move down slope depends on multiple factors including the type of material, water content, and steepness of terrain. As discussed in the Final PEIR, the Specific Plan Program area is flat with no hills or cliffs, where the risk of landslides is considered very low. Thus, impacts related to landslide hazards would not result from implementation of the Specific Plan Program.

Cumulative

The Final PEIR did not address cumulative landslide impacts because the Specific Plan Program site is located on relatively flat terrain. Therefore, the Specific Plan Program would result in no impacts to geologic hazards including landslides and would not contribute a cumulative considerable impact related to geological hazards such as landslides.

Proposed Project Evaluation

Proposed Project-Specific

As with the Specific Plan Program, the Proposed Project is located on relatively flat terrain with little elevation change across the Project site and therefore, the potential for landsliding is considered very low. Additionally, based on the DOC Landslide Inventory (Beta) Map, the Project site is not located within a landslide zone (DOC, 2022b). Therefore, no impacts related to landslide hazards would result from implementation of the Proposed Project.

Cumulative

As with the Specific Plan Program, the Proposed Project would not result in geological hazards such as landslides because the Project site is on relatively flat terrain and not located within a landslide zone. Therefore, the Proposed Project would not contribute to a cumulative landslide impact.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the implementation of the Proposed Project would result in no impacts to geologic hazards related to landslides. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Soil Erosion or Loss of Topsoil

Impact 3.7-5: The Specific Plan Program and Proposed Project would have a less than significant and less than cumulatively considerable effect from soil erosion or loss of topsoil.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

Although the Specific Plan Program site is located within a developed urban area, the Final PEIR stated that construction activities may include excavation, grading, and other soil-disturbing activities that could result in soil erosion or loss of topsoil during rain or high-wind events. However, for projects disturbing more than an acre of ground surface, the Construction General Permit requires the preparation and implementation of a SWPPP that would include erosion control and sediment control BMPs such as sandbags and covering soil stockpiles, which would ensure that soil erosion and loss of topsoil on the construction site would be minimized. Specific developments as part of the Specific Plan Program that disturb less than an acre of ground surface would be required to implement at a minimum the BMPs identified in the Los Angeles County MS4 Permit (RWQCB Order No. R4-2010-0175), which include erosion control and sediment control strategies for small construction sites. Compliance with Construction General Permit and MS4 Permit requirements would ensure less than significant impacts related to erosion and topsoil during construction of specific developments in the Specific Plan Program area.

The Final PEIR stated that the Specific Plan Program area is developed and estimated to be between 80 to 90 percent impervious; new development and redevelopment projects proposed by the Specific Plan Program would not alter the ratio of pervious to impervious surfaces in the Specific Plan Program area. Therefore, the chance of soil erosion and topsoil loss occurring during operation of the new development is low. Depending on the Specific Plan Program Zoning designation, a minimum of between 10 and 20 percent of each lot must be landscaped with trees, ground cover, shrubbery and flowers as required by the Specific Plan Program; these landscaped areas could erode and lose topsoil if not properly designed. However, as part of compliance with the Los Angeles County Low Impact Development (LID) Standards, any specific project under the Specific Plan Program qualifying as a new development or a redevelopment project would be designed to reduce offsite runoff, promote rainwater harvesting, and reduce erosion and hydrologic impacts downstream. By reducing the velocity and quantity of stormwater onsite, the potential for erosion and topsoil loss in landscaped areas caused by runoff is also reduced. The

presence of vegetation in landscaped areas would reduce the ability of soil to be eroded and lost by wind erosion. Impacts related to erosion and topsoil loss during operation of proposed developments under the Specific Plan Program would be less than significant.

Cumulative

The Final PEIR identified that topsoil and erosion impacts are typically site-specific. All cumulative projects adjacent to the Specific Plan Program area disturbing more than an acre of ground surface would be required to implement erosion control and sediment control BMPs as required by their site-specific SWPPPs per Construction General Permit requirements. Cumulative projects not falling into this disturbance category would be required at a minimum to implement erosion and sediment control BMPs listed in the MS4 Permit. Therefore, cumulative developments would result in less than significant erosion and topsoil loss impacts because these projects would be required to comply with existing regulations. Because the Specific Plan Program would result in less than significant soil erosion and loss of topsoil impacts. The Specific Plan Program's contribution to cumulative soil erosion and loss of topsoil impacts would be less than cumulatively significant.

Proposed Project Evaluation

Proposed Project-Specific

Implementation of the Proposed Project would increase the amount of impervious surfaces on the Project site. This increase would reduce the amount of topsoil exposed during storms, and therefore, could result in a reduction of erosion and loss of topsoil compared to existing conditions. However, for individual developments within the Project site, some construction areas may encompass more than one acre and some may encompass less than one acre.

As stated above, if individual developments include construction areas of more than an acre of ground surface, the Construction General Permit requires the preparation and implementation of a SWPPP that would include erosion control and sediment control BMPs such as sandbags and covering soil stockpiles. The implementation of these typical BMPs would ensure that soil erosion and loss of topsoil on the construction site would be minimized. Individual development on the Project site that include construction areas of less than an acre of ground surface would be required to implement, at a minimum, the BMPs identified in the Los Angeles County MS4 Permit (RWQCB Order No. R4-2010-0175), which include erosion control and sediment control strategies for small construction sites. Therefore, adherence to these requirements by the Proposed Project would result in less than significant erosion and topsoil loss impacts during construction activities. In addition, with the Proposed Project increasing the amount of impervious surfaces on the Project site and incorporating landscape areas throughout the site, impacts related to erosion and topsoil loss during operation of the Proposed Project would be less than significant.

Cumulative

As stated above, topsoil and erosion impacts are typically site-specific. All cumulative projects adjacent to the Project site that disturb more than an acre of ground surface would be required to implement erosion control and sediment control BMPs as required by their site-specific SWPPPs per Construction General Permit requirements. Cumulative projects not falling into this

disturbance category would be required, at a minimum, to implement erosion and sediment control BMPs listed in the MS4 Permit. Therefore, compliance to these requirements by cumulative projects would result in less than significant impacts. Because the Proposed Project would also be required to comply with these requirements, the Proposed Project's contribution to cumulative soil erosion and loss of topsoil impacts would be less than cumulatively considerable, and thus less than cumulatively significant.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the implementation of the Proposed Project would result in less than significant impacts related to soil erosion and loss of topsoil. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Geologic Instability

Impact 3.7-6: The Specific Plan Program and Proposed Project would have a less than significant and less than cumulatively considerable instability effects from on-or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

As stated in the Final PEIR, the Specific Plan Program area would have no impact on the Specific Plan Program area related to landslides given that the topography is flat. Furthermore, as stated in the Final PEIR, development in accordance with the Specific Plan Program requires conformance with the CBC and the County ordinances that would reduce impacts from liquefaction and liquefaction-induced lateral spreading within the Specific Plan Program area to the maximum extent possible under currently accepted engineering practices. These engineering practices could include densification of soils, soil reinforcement, and drainage/dewatering to reduce pore water pressure within the soil. Therefore, the Specific Plan Program would result in less than significant impacts related to liquefaction and liquefaction-induced lateral spreading.

Because historical groundwater levels are within 40 feet of the surface in the Specific Plan Program area, settlement of the ground surface can occur when liquefied ground reconsolidates following an earthquake. However, development under the Specific Plan Program would be required to adhere to County building code requirements, which include the preparation of a geotechnical investigation by a state licensed geotechnical engineer. The required geotechnical report for any new development or redevelopment would determine the susceptibility of the

Project site to settlement, subsidence or collapse and prescribe appropriate engineering techniques for reducing its effects. Site preparation measures such as use of engineered fill, surcharging, wick drains, compaction requirements, structural slabs could be used. These measures would be evaluated, and the most effective, feasible, and economical measures recommended in a geotechnical report would be incorporated into the site design in accordance with the building requirements. Therefore, with adherence to building code requirements, the potential for unstable soils resulting in settlement, subsidence, or collapse to adversely affect structures and improvements would be reduced to less than significant.

Cumulative

The Final PEIR stated that the study area for potential cumulative geology and soils impacts involving landslides, liquefaction, lateral spreading, settlement, subsidence and collapsible soils includes the Specific Plan Program area and areas immediately adjacent to the Specific Plan Program area because the direct geology and soil impacts are site specific and people and structures within the Specific Plan Program could be exposed to indirect hazards from unstable structures immediately adjacent to the Specific Plan Program area. The topography of the Specific Plan Program area and vicinity is flat and therefore, no cumulative impacts from landslides would occur. The Final PEIR stated that future cumulative development could be located in areas susceptible to liquefaction, lateral spreading, settlement, subsidence and collapsible soils similar to the Specific Plan Program. Because future development could be exposed to these impacts, people and structures could be exposed to hazards from these impacts. However, as required for all new developments, conforming to the CBC and local ordinances would reduce potential impacts from liquefaction, lateral spreading, settlement, subsidence and collapsible soils for future cumulative development to the maximum extent possible under currently accepted engineering practices such as the site preparation and design measures identified above. Because the Specific Plan Program would result in less than significant impacts related to geologic hazards including geologic instability, the Specific Plan Program's contribution to geologic instability would be less than cumulatively considerable, and thus, less than cumulatively significant.

Proposed Project Evaluation

Proposed Project-Specific

As with the Specific Plan Program, the Project site would have no impact on the Specific Plan Program area related to landslides given that the topography contains relatively flat terrain. As discussed above, the Proposed Project is located within an area designated as "Liquefiable." However, the Geotechnical Report's recommendation that the Proposed Project structures be supported by a mat foundation system would comply with the CBC and County ordinances to reduce potential liquefaction impacts to less than significant. Therefore, the Proposed Project would result in less than significant stability impacts due to liquefaction and liquefaction-induced lateral spreading.

The Project site could result in seismically-induced settlement (collapse). However, the Geotechnical Report's recommendation that the Proposed Project construction activities include over-excavation and compaction, and proposed structures be supported by a mat foundation

system that would comply with the CBC and County ordinances to reduce potential seismically-induced settlement impacts to less than significant.

Cumulative

Areas in the vicinity of the Project site contain relatively flat terrain and therefore, cumulative development would have no landslide impacts. Future cumulative development in the vicinity of the Project site could be located in areas susceptible to liquefaction, lateral spreading, settlement, subsidence and collapsible soils similar to the Project site. However, as required for all new developments, conforming to the CBC and local ordinances would reduce potential impacts to cumulative projects from liquefaction, lateral spreading, settlement, subsidence and collapsible soils. Because the Proposed Project would result in less than significant impacts related to geologic hazards including geologic instability, the Proposed Project's contribution to geologic instability would be less than cumulatively considerable, and thus, less than cumulatively significant.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the implementation of the Proposed Project would result in no landslide impacts and less than significant impacts related to geologic instability involving liquefaction, lateral spreading, settlement, subsidence and collapsible soils. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Expansive Soils

Impact 3.7-7: The Specific Plan Program and Proposed Project would have a less than significant and less than cumulatively considerable geologic effects from expansive soil that could create substantial direct or indirect risks to life or property.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Initial Study/Notice of Preparation and Final PEIR identified that the Specific Plan Program area is underlain by young Quaternary Alluvium, which are dominated by loose to moderately dense sandy sediments (CDOC, 1998), which are not typically expansive. Compliance with the CBC and County ordinances require soil characteristics such as expansive soils to be taken into account during foundation design. Because expansive soils would be considered during design as required by the CBC and County ordinances, the Final PEIR identified potential expansive soil impacts to developments associated with the Specific Plan Program to be less than significant.

Cumulative

The Final PEIR did not address the cumulative impact on expansive soils since the soils within the Specific Plan Program area are dominated by loose to moderately dense sandy sediments that are not typically expansive. However, because development under the Specific Plan Program would be required to comply with the CBC and County ordinances in the design of foundations and consider expansive soils, potential impacts would be less than significant. As a result, the Specific Plan Program's contribution to cumulative expansive soil impacts would be less than cumulatively considerable.

Proposed Project Evaluation

Proposed Project-Specific

The Geotechnical Report prepared for the Proposed Project identified that onsite soils are in the Low to Moderate expansion range. Because development under the Proposed Project would be required to comply with the CBC and County ordinances in the design of foundations and consider expansive soils, potential expansive soil impacts would be less than significant.

Cumulative

Future cumulative development in the vicinity of the Project site could be located in areas susceptible to expansive soils. However, cumulative development would be required to comply with the CBC and County ordinances in the design of foundations and consider expansive soils, and therefore, potential impacts would be less than significant. Because the Proposed Project would result in less than significant impacts associated with expansive soils due to the requirement to comply with the CBC and County Ordinances, the Proposed Project's contribution to cumulative expansive soil impacts would be less than cumulatively considerable.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the implementation of the Proposed Project would result in less than significant impacts related to expansive soils. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Soils and Waste Water Disposal Systems

Impact 3.7-8: The Specific Plan Program and Proposed Project would not include the use of septic tanks or alternative waste water systems, and therefore, the Specific Plan Program and Proposed Project would not result in impacts or contribute to cumulative impacts from soils that support these systems.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Initial Study/Notice of Preparation and Final PEIR identified that the Specific Plan Program area is served by a sewer system. Septic tanks would not be utilized by the Specific Plan Program. All development associated with the Specific Plan Program would connect to and be served by the existing public sewer system for wastewater discharge and treatment. Therefore, the Specific Plan Program would not result in soil impacts from the use of septic tanks or systems that are an alternative to sewer lines.

Cumulative

The Final PEIR did not address the cumulative soil impacts from the use of septic tanks or systems that are an alternative to sewer lines because the Specific Plan Program did not include a provision to use these types of systems. Therefore, the Specific Plan Program would not contribute to cumulative soil impacts from the use of septic tanks or systems that are an alternative to sewer lines.

Proposed Project Evaluation

Proposed Project-Specific

The Proposed Project would include sewer lines to connect to the existing sewer system. No septic tanks would be used on the Project site. Therefore, the Proposed Project would result in no soil impacts from the use of septic tanks or systems that are an alternative to sewer lines.

Cumulative

The area in the vicinity of the Project site is currently served by existing sewer lines and no septic tanks. Therefore, soil impacts from the use of septic tanks or systems that are an alternative to sewer lines from cumulative development are not expected to occur. Because the Proposed Project would not include the use of septic tanks, the Proposed Project would not contribute to cumulative soil impacts from the use of septic tanks or systems that are an alternative to sewer lines.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the implementation of the Proposed Project would not impact soils from the use of septic tanks or systems that are an alternative to sewer lines. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major

revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Hillside Management Area Ordinance

Impact 3.7-9: The Specific Plan Program and Proposed Project would not conflict with the Hillside Area Ordinance, and therefore, the Proposed Project would not result in impacts or contribute to cumulative impacts associated with the standards within the Hillside Area Ordinance.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Initial Study/Notice of Preparation and Final PEIR identified that the Specific Plan Program area is not located within a Hillside Management Area or within an area that is subject to hillside design standards. The Specific Plan Program area has a relatively flat topography and is not adjacent to a hillside. As a result, the Specific Plan Program would not conflict with the Hillside Management Area Ordinance, or any hillside standards, and no impact would occur.

Cumulative

The Final PEIR did not address the cumulative impact on the Hillside Management Area Ordinance because the Specific Plan Program is not within a Hillside Management Area or within an area that is subject to hillside design standards. Therefore, the Proposed Project would not contribute to any cumulative impacts related to the Hillside Management Area Ordinance, or any hillside standards.

Proposed Project Evaluation

Proposed Project-Specific

As with the Specific Plan Program area, the Project site is not located within a Hillside Management Area or within an area that is subject to hillside design standards. Therefore, the implementation of the Proposed Project would not conflict with the Hillside Management Area Ordinance, or any hillside design standards, and no impact would occur.

Cumulative

Cumulative development in the vicinity of the Project site is not located within a Hillside Management Area or within an area that is subject to hillside design standards. Therefore, cumulative development would not conflict with the Hillside Management Area Ordinance, or any hillside standards. Because the Proposed Project is not located within a Hillside Management Area or within an area that is subject to hillside design standards, the Proposed Project would not contribute to cumulative impacts associated with any cumulative conflicts with hillside design standards.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the implementation of the Proposed Project would not result in conflicts with the Hillside Management Area Ordinance, or any hillside design standards, and no impacts would occur. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

3.7.6 References

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3.8 Greenhouse Gas Emissions

3.8.1 Introduction

This section addresses greenhouse gas emissions related to how emissions are generated and how they can be reduced, and the potential of the Proposed Project to impact those resources. This section includes a brief summary of the environmental setting included in the Final PEIR, and the identification of any direct or indirect changes to the setting due to greenhouse gas emissions that may have occurred since the certification of the Final PEIR. In addition, a brief summary of the regulatory setting included in the Final PEIR and any substantive revisions to the regulatory setting that has occurred since the certification of the Final PEIR. This section also includes the thresholds of significance and a brief summary of the greenhouse gas emission impacts and mitigation measures addressed in the Final PEIR as well as the potential impacts associated with the Proposed Project emissions. Finally, this section provides a conclusion of whether (1) the Proposed Project includes substantial changes that would require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact related to greenhouse gas emissions; (2) substantial changes in the circumstances under which the Proposed Project is undertaken would require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact related to greenhouse gas emissions; or (3) new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3) exist related to greenhouse gas emissions.

3.8.2 Environmental Setting

Global Climate Change

Global climate change refers to changes in average climatic conditions on Earth as a whole, including changes in temperature, wind patterns, precipitation, and storms. Historical records indicate that global climate changes have occurred in the past due to natural phenomena; however, current data increasingly indicate that the current global conditions differ from past climate changes in rate and magnitude. The current changes in global climate have been attributed to anthropogenic (human-caused) activities by the Intergovernmental Panel on Climate Change (Intergovernmental Panel on Climate Change (IPCC) 2014). The term GHG refers to gases that trap long-wave radiation or heat in the atmosphere, which heats the surface of the Earth. Without human intervention, the Earth maintains an approximate balance between the GHG emissions in the atmosphere and the storage of GHGs in the oceans and terrestrial ecosystems. GHGs are the result of both natural and anthropogenic activities. Forest fires, decomposition, industrial processes, landfills, and consumption of fossil fuels for power generation, transportation, heating, and cooking are the primary sources of GHG emissions.

The Federal Government and State of California recognized that anthropogenic GHG emissions are contributing to changes in the global climate, and that such changes are having and will have adverse effects on the environment, the economy, and public health. While worldwide contributions of GHG emissions are expected to have widespread consequences, it is not possible

to link particular changes to the environment of California or elsewhere to GHGs emitted from a particular source or location. In other words, emissions of GHGs have the potential to cause global impacts rather than local impacts. Increased concentrations of GHGs in the Earth's atmosphere have been linked to global climate change and such conditions as rising surface temperatures, melting icebergs and snowpack, rising sea levels, and the increased frequency and magnitude of severe weather conditions (IPCC 2014). Existing climate change models also show that climate warming portends a variety of impacts on agriculture, including loss of microclimates that support specific crops, increased pressure from invasive weeds and diseases, and loss of productivity due to changes in water reliability and availability (CNRA 2018). In addition, rising temperatures and shifts in microclimates associated with global climate change are expected to increase the frequency and intensity of wildfires (United States Global Change Research Program 2018).

State law defines GHGs to include the following compounds: carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6) (see e.g., State CEQA Guidelines Section 15364.5 and Health and Safety Code, Section 38505(g)). The most common GHG that results from human activity is CO_2, which represents 76 percent of total anthropogenic GHG emissions in the atmosphere (as of 2010 data), followed by CH_4 and N_2O. Scientists have established a Global Warming Potential (GWP) to gauge the potency of each GHG's ability to absorb and re-emit long-wave radiation and these GWP ratios are available from the IPCC (IPCC 2014). The GWP of a gas is determined using CO_2 as the reference gas with a GWP of 1 over 100 years. For example, a gas with a GWP of 10 is 10 times more potent than CO_2 over 100 years. The sum of each GHG multiplied by its associated GWP is referred to as carbon dioxide equivalents (CO_2e). The measurement unit CO_2e is used to report the combined potency of GHG emissions.

Historically, GHG emission inventories have been calculated using the GWPs from the IPCC's Second Assessment Report (SAR). In 2007, IPCC updated the GWP values based on the latest science at the time in its Fourth Assessment Report (AR4). The updated GWPs in the IPCC AR4 have begun to be used in recent GHG emissions inventories. In 2013, IPCC again updated the GWP values based on the latest science in its Fifth Assessment Report (AR5) (IPCC 2013). However, United Nations Framework Convention on Climate Change (UNFCCC) reporting guidelines for national inventories require the use of GWP values from the AR4. To comply with international reporting standards under the UNFCCC, official emission estimates for California and the United States are reported using AR4 GWP values. Therefore, statewide and national GHG inventories have not yet updated their GWP values to the AR5 values. By applying the GWP ratios, project-related CO_2e emissions can be tabulated in metric tons per year. Typically, the GWP ratio corresponding to the warming potential of CO_2 over a 100-year period is used as a baseline. Compounds that are regulated as GHGs are discussed below and their respective GWPs are summarized in **Table 3.8-1**, *Regulated Greenhouse Gas's Reported GWP Values*.

TABLE 3.8-1
REGULATED GREENHOUSE GAS'S REPORTED GWP VALUES

Regulated GHG Compound	IPCC SAR GWP	IPCC AR4 GWP	IPCC AR5 GWP
Carbon Dioxide (CO_2)	1	1	1
Methane (CH_4)	21	25	28
Nitrous Oxide (N_2O)	310	298	265
Hydrofluorocarbons (HFCs)	140 to 11,700	124 to 14,800	138 to 12,400
Perfluorocarbons (PFCs)	6,500 to 9,200	7,390 to 17,700	6,630 to 17,400
Sulfur Hexafluoride (SF_6)	23,900	22,800	23,500
Nitrogen Trifluoride (NF_3)	—	17,200	16,100

SOURCES: Intergovernmental Panel on Climate Change, *Climate Change 2014: Synthesis Report. Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change*, 2014, accessed April 2021, https://www.ipcc.ch/report/ar5/syr/.

Carbon Dioxide (CO_2): CO_2 is the most abundant GHG in the atmosphere and is primarily generated from fossil fuel combustion from stationary and mobile sources. CO_2 is the reference gas (GWP of 1) for determining the GWPs of other GHGs.

Methane (CH_4): CH_4 is emitted from biogenic sources (i.e., resulting from the activity of living organisms), incomplete combustion in forest fires, landfills, manure management, and leaks in natural gas pipelines. The GWP of CH_4 is 21 in the IPCC SAR, 25 in the IPCC AR4, and 28 in the IPCC AR5.

Nitrous Oxide (N_2O): N_2O produced by human-related sources including agricultural soil management, animal manure management, sewage treatment, mobile and stationary combustion of fossil fuel, adipic acid production, and nitric acid production. The GWP of N_2O is 310 in the IPCC SAR, 298 in the IPCC AR4, and 265 in the IPCC AR5.

Hydrofluorocarbons (HFCs): HFCs are fluorinated compounds consisting of hydrogen, carbon, and fluorine. They are typically used as refrigerants in both stationary refrigeration and mobile air conditioning systems. The GWPs of HFCs ranges from 140 for HFC-152a to 11,700 for HFC-23 in the IPCC SAR, 124 for HFC-152a to 14,800 for HFC-23 in the IPCC AR4, and 138 for HFC-152a to 12,400 for HFC-23 in the IPCC AR5.

Perfluorocarbons (PFCs): PFCs are fluorinated compounds consisting of carbon and fluorine. They are primarily created as a byproduct of aluminum production and semiconductor manufacturing. The GWPs of PFCs range from 6,500 to 9,200 in the IPCC SAR, 7,390 to 17,700 in the IPCC AR4, and 6,630 to 17,400 in the IPCC AR5.

Sulfur Hexafluoride (SF_6): SF_6 is a fluorinated compound consisting of sulfur and fluoride. It is a colorless, odorless, nontoxic, nonflammable gas. It is most commonly used as an electrical insulator in high voltage equipment that transmits and distributes electricity. SF_6 has a GWP of 23,900 in the IPCC SAR, 22,800 in the IPCC AR4, and 23,500 in the IPCC AR5.

Nitrogen Trifluoride (NF_3): NF_3 is a fluorinated compound consisting of nitrogen and fluoride. It is an inorganic, colorless, non-flammable, toxic gas with a slightly musty odor. NF_3 is a

chemical released in some high-tech industries, including in the manufacture of many electronics and semi-conductors. NF_3 has a GWP of 17,200 in the IPCC AR4, and 16,100 in the IPCC AR5.

The California Air Resources Board (CARB) compiles the State's GHG emissions inventory. The most updated inventory is referred to as the 2023 edition, which reports the State's GHG emissions inventory from calendar year 2021. Based on the 2021 GHG inventory data (i.e., the latest year for which data are available from CARB), California emitted 381.3 million metric tons of CO2e (MMTCO2e), which includes emissions resulting from imported electrical power (CARB 2024). Between 1990 and 2024, the population of California grew by approximately 32 percent (from 29.8 to 39.1 million residents) (USCB 1995; CDF 2024). In addition, the California economy, measured as gross State product, grew from approximately $733 billion in 1990 to $3.6 trillion in 2022, representing an increase of approximately five times the 1990 gross state product (CDF 2023). According to CARB, as of 2016, statewide GHG emissions dropped below the 2020 GHG limit (431 $MMTCO_2e$) and have remained below the limit since that time.

Table 3.8-2, *State of California Greenhouse Gas Emissions*, identifies and quantifies statewide anthropogenic GHG emissions and sinks (e.g., carbon sequestration due to forest growth) in 1990 and 2021. As shown in the table, the transportation sector is the largest contributor to statewide GHG emissions at approximately 38 percent in 2021.

TABLE 3.8-2
STATE OF CALIFORNIA GREENHOUSE GAS EMISSIONS

Category	Total 1990 Emissions using IPCC SAR ($MMTCO_2e$)	Percent of Total 1990 Emissions	Total 2021 Emissions using IPCC AR4 ($MMTCO_2e$)	Percent of Total 2021 Emissions
Transportation	150.7	35%	145.6	38%
Electric Power	110.6	26%	62.4	16%
Commercial	14.4	3%	13.3	4%
Residential	29.7	7%	25.5	7%
Industrial	103.0	24%	73.9	19%
Recycling and Waste[a]	—	—	8.4	2%
High GWP/Non-Specified[b]	1.3	<1%	21.3	6%
Agriculture/Forestry	23.6	6%	30.9	8%
Forestry Sinks	-6.7	—	__[c]	—
Net Total (IPCC SAR)	**426.6**	**100%**	**—**	**—**
Net Total (IPCC AR4)[d]	**431**	**100%**	**381.3**	**100%**

NOTES:

IPCC = Intergovernmental Panel on Climate Change; SAR = Second Assessment Report; AR4 = Fourth Assessment Report; $MMTCO_2e$ = million metric tons of carbon dioxide equivalent; GWP = global warming potential
Totals may not add up exactly due to rounding.

a. Included in other categories for the 1990 emissions inventory.
b. High GWP gases are not specifically called out in the 1990 emissions inventory.
c. Revised methodology under development (not reported for 2021).
d. CARB revised the state's 1990 level GHG emissions using GWPs from the IPCC AR4.

SOURCE: CARB 2024

3.8.3 Effects of Global Climate Change

The scientific community's understanding of the fundamental processes responsible for global climate change has improved over the past decade, and its predictive capabilities are advancing. However, there remain significant scientific uncertainties in, for example, predictions of local effects of climate change, occurrence, frequency, and magnitude of extreme weather events, effects of aerosols, changes in clouds, shifts in the intensity and distribution of precipitation, and changes in oceanic circulation. Due to the complexity of the Earth's climate system and inability to accurately model it, the uncertainty surrounding climate change may never be completely eliminated. Nonetheless, the IPCC's AR5 states that, "it is *extremely likely* that more than half of the observed increase in global average surface temperature from 1951 to 2010 was caused by the anthropogenic increase in greenhouse gas concentrations and other anthropogenic forces [*sic*] together" (IPCC 2013). A report from the National Academy of Sciences concluded that 97 to 98 percent of the climate researchers most actively publishing in the field support the tenets of the IPCC in that climate change is very likely caused by human (i.e., anthropogenic) activity (Anderegg et al. 2010). According to CARB, the potential impacts in California due to global climate change may include: loss in snow pack; sea level rise; more extreme heat days per year; more high ozone days; more large forest fires; more drought years; increased erosion of California's coastlines and sea water intrusion into the Sacramento and San Joaquin Deltas and associated levee systems; and increased pest infestation (Cal EPA 2006). Below is a summary of some of the potential effects that could be experienced in California as a result of global warming and climate change.

Air Quality

Higher temperatures, conducive to air pollution formation, could worsen air quality in California. Climate change may increase the concentration of ground-level ozone, but the magnitude of the effect, and therefore, its indirect effects, are uncertain. If higher temperatures are accompanied by drier conditions, the potential for large wildfires could increase, which, in turn, would further worsen air quality. However, if higher temperatures are accompanied by wetter, rather than drier conditions, the rains would tend to temporarily clear the air of particulate pollution and reduce the incidence of large wildfires, thus ameliorating the pollution associated with wildfires. Additionally, severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks throughout the state (California Energy Commission (CEC) 2006).

In 2018, the California Natural Resources Agency (CNRA) published the Safeguarding California Plan: 2018 Update, as a continuation of the policy vision Governor's Executive Order S-13-2008 and the 2009 CNRA California Climate Adaptation Strategy (CRNA 2018). The CNRA plan lists specific actions and recommendations for State and local agencies to best adapt to the anticipated risks posed by a changing climate. In accordance with the 2009 CNRA California Climate Adaptation Strategy, the CEC developed the Cal-Adapt website, which became operational in 2011, that synthesizes climate change scenarios and impacts to benefit local decision makers (CRNA 2009). As stated in the CNRA Safeguarding California Plan: 2018 Update, "the Cal-Adapt.org web portal is at the forefront of resources for specific communities to understand how climate change will raise temperatures and exacerbate extreme heat events, drought, snowpack

loss, wildfire, and coastal flooding." The information provided on the Cal-Adapt website represents a projection of potential future climate scenarios. The data are comprised of the average values (i.e., temperature, sea-level rise, snowpack) from a variety of scenarios and models and are meant to illustrate how the climate may change based on a variety of different potential social and economic factors. According to the Cal-Adapt website, the portion of Los Angeles County in which the Proposed Project site is located could result in an average increase in temperature of approximately 4.3°F to 7.3°F by 2070–2099, compared to the baseline 1961–1990 period (73.0°F), which is a potential increase of approximately 6 to 10 percent (Cal Adapt 2024). Data suggests that the predicted future increase in temperatures as a result of climate change could potentially interfere with efforts to control and reduce ground-level ozone in the region.

Water Supply

Uncertainty remains with respect to the overall impact of global climate change on future water supplies in California. Studies have found that, "Considerable uncertainty about precise impacts of climate change on California hydrology and water resources will remain until we have more precise and consistent information about how precipitation patterns, timing, and intensity will change (Pacific Institute for Studies in Development, Environment, and Security, 2003)." For example, some studies identify little change in total annual precipitation in projections for California, while others show significantly more precipitation. Warmer, wetter winters would increase the amount of runoff available for groundwater recharge; however, this additional runoff would occur at a time when some basins are either being recharged at their maximum capacity or are already full. Conversely, reductions in spring runoff and higher evapotranspiration because of higher temperatures could reduce the amount of water available for recharge (Pacific Institute for Studies in Development, Environment, and Security 2003).

The California Department of Water Resources report on climate change and effects on the State Water Project (SWP), the Central Valley Project, and the Sacramento-San Joaquin Delta, concludes that "climate change will likely have a significant effect on California's future water resources…[and] future water demand." It also reports that "much uncertainty about future water demand [remains], especially [for] those aspects of future demand that will be directly affected by climate change and warming. While climate change is expected to continue through at least the end of this century, the magnitude and, in some cases, the nature of future changes is uncertain." It also reports that the relationship between climate change and its potential effect on water demand is not well understood, but "[i]t is unlikely that this level of uncertainty will diminish significantly in the foreseeable future." Still, changes in water supply are expected to occur, and many regional studies have shown that large changes in the reliability of water yields from reservoirs could result from only small changes in inflows (California Department of Water Resources 2006). In its *Fifth Assessment Report*, the IPCC states "Changes in the global water cycle in response to the warming over the 21st century will not be uniform. The contrast in precipitation between wet and dry regions and between wet and dry seasons will increase, although there may be regional exceptions" (IPCC 2013). The *Sixth Assessment Report* further states, "Continued global warming is projected to further intensify the global water cycle, including its variability, global monsoon precipitation and the severity of wet and dry events" (IPCC 2021).

Hydrology and Sea Level Rise

As discussed above, climate changes could potentially affect the amount of snowfall, rainfall and snow pack; the intensity and frequency of storms; flood hydrographs (flash floods, rain or snow events, coincidental high tide, and high runoff events); sea level rise and coastal flooding; coastal erosion; and the potential for salt water intrusion. Sea level rise can be a product of global warming through two main processes: expansion of seawater as the oceans warm and melting of ice over land. A rise in sea levels could result in coastal flooding and erosion and could jeopardize California's water supply. Increased storm intensity and frequency could affect the ability of flood-control facilities, including levees, to handle storm events.

Agriculture

California has a $59 billion agricultural industry that produces half the country's fruits and vegetables. Higher CO_2 levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, water demand could increase, crop-yield could be threatened by a less reliable water supply, and greater ozone pollution could render plants more susceptible to pest and disease outbreaks. In addition, temperature increases could change the time of year certain crops such as wine grapes bloom or ripen, and thus affect their quality (California Department of Food and Agriculture 2023; California Climate Change Center 2006).

Ecosystems and Wildlife

Increases in global temperatures and the potential resulting changes in weather patterns could have ecological effects on a global and local scale. Increasing concentrations of GHGs are likely to accelerate the rate of climate change. Scientists expect that the average global surface temperature could rise by 2-11.5°F (1.1-6.4°C) by 2100, with significant regional variation (National Research Council of the National Academies 2010). Soil moisture is likely to decline in many regions, and intense rainstorms are likely to become more frequent. Sea level could rise as much as two feet along most of the U.S. coast. Rising temperatures could have four major impacts on plants and animals: (1) timing of ecological events, (2) geographic range, (3) species' composition within communities, and (4) ecosystem processes such as carbon cycling and storage (Parmesan 2004; Parmesan et al. 2004).

3.8.4 Regulatory Setting

Federal

Light-Duty Vehicle GHG and Fuel Efficiency Standards

In August 2018, USEPA and NHTSA proposed the Safer Affordable Fuel-Efficient Vehicles Rule that would, maintain the Corporate Average Fuel Economy (café) and CO_2 standards applicable in model year 2020 for model years 2021 through 2026. The estimated CAFE and CO_2 standards for model year 2020 are 43.7 mpg and 204 grams of CO_2 per mile for passenger cars and 31.3 mpg and 284 grams of CO_2 per mile for light trucks, projecting an overall industry average of 37 mpg, as compared to 46.7 mpg under the standards issued in 2012. The proposal would also exclude CO_2-equivalent emission improvements associated with air conditioning

refrigerants and leakage (and, optionally, offsets for nitrous oxide and methane emissions) after model year 2020. The proposed Safer Affordable Fuel-Efficient Vehicles Rule's public comment period was extended to October 26, 2018. As of March 31, 2020, the SAFE Vehicles Rule, issued by NHTSA and EPA, was finalized and set fuel economy and CO_2 standards that increase 1.5 percent in stringency each year for model years 2021 through 2026 for passenger cars and light trucks. (This is less stringent than the 2012 proposed standard, which would have required increases of 5 percent each year.) The anticipated average required fuel economy will be 40.4 mpg by MY2026 (NHSTA 2020).

On January 20, 2021, President Biden issued Executive Order 13990 "Protecting Public Health and the Environment and Restoring Science To Tackle the Climate Crisis" directing USEPA to consider whether to propose suspending, revising, or rescinding the standards previously revised under the "The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021–2026 Passenger Cars and Light Trucks," promulgated in April 2020. As of August 2021, USEPA is proposing to revise the GHG standards to be more stringent than the SAFE rule standards in each model year from 2023 through 2026 (USEPA 2021). More recently proposed federal standards for motor vehicle tailpipe emissions include:

- Revocation of the SAFE Vehicles Rule: On March 14, 2022, USEPA published its Notice of Decision to restore California's waiver, which allows California to set more stringent vehicle fuel efficiency standards, rescinding the SAFE Vehicles Rule (Federal Register Volume 87, page 14332).
- Issuance of the Revised 2023 and Later Model Year Light-Duty Vehicle GHG Emissions Standards: The issuance of these standards revises the GHG emissions standards for vehicles from model years 2023–2026 and establishes the most stringent GHG emissions standards ever set for the light-duty-vehicle sector. These standards are expected to result in average fuel economy label values of 40 miles per gallon, while the standards they replace (the SAFE rule standards) would achieve only 32 miles per gallon in model year 2026 vehicles (USEPA 2021).

Heavy-Duty Engines and Vehicles Fuel Efficiency Standards

On October 25, 2010, USEPA and the U.S. Department of Transportation proposed the first national standards to reduce greenhouse gas emissions and improve fuel efficiency of heavy-duty trucks and buses (also known as "Phase 1"). The Phase 1 standards generally set standards for reductions in carbon dioxide emissions and fuel consumption for model year 2014 through 2018 engines. Building on the success of the Phase 1 standards, USEPA and U.S. Department of Transportation jointly finalized additional standards (called "Phase 2") for medium- and heavy-duty vehicles through model year 2027 that further improve fuel efficiency and cut carbon pollution. The Phase 2 final standards are expected to lower CO_2 emissions by approximately 1.1 billion metric tons. On March 29, 2024, the USEPA announced the final Greenhouse Gas Emissions Standards for Heavy-Duty Vehicles – Phase 3 that sets stronger standards to reduce greenhouse gas emissions from heavy-duty vehicles beginning in model year 2027 to model year 2032. The Phase 3 standards will be applicable to heavy-duty vocational vehicles (such as delivery trucks, refuse haulers, public utility trucks, transit, shuttle, school buses, etc.) and tractors (such as day cabs and sleeper cabs on tractor-trailer trucks) and the Phase 3 final standards are expected to lower CO_2 emissions by approximately 1.0 billion metric tons (USEPA 2024).

State

California has promulgated a series of executive orders, laws, and regulations aimed at reducing both the level of GHGs in the atmosphere and emissions of GHGs from commercial and private activities within the State.

AB 32

In 2006, the California State Legislature adopted AB 32 (codified in the California Health and Safety Code [HSC], Division 25.5, California Global Warming Solutions Act of 2006), which focuses on reducing GHG emissions in California to 1990 levels by 2020. HSC Division 25.5 defines GHGs as CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6 and represents the first enforceable statewide program to limit emissions of these GHGs from all major industries with penalties for noncompliance. The law further requires that reduction measures be technologically feasible and cost effective. Under HSC Division 25.5, CARB has the primary responsibility for reducing GHG emissions. CARB is required to adopt rules and regulations directing state actions that would achieve GHG emissions reductions equivalent to 1990 statewide levels by 2020.

Senate Bill 32

In 2016, the California State Legislature adopted Senate Bill (SB) 32 and its companion bill AB 197, and both were signed by Governor Brown (Office of Edmund G. Brown Jr. 2016). SB 32 and AB 197 amend HSC Division 25.5, establish a new GHG reduction target of 40 percent below 1990 levels by 2030, and include provisions to ensure the benefits of state climate policies reach into disadvantaged communities.

Executive Order B-55-18

Executive Order B-55-18 was signed by Governor Edmund G. Brown Jr. on September 10, 2018 (Office of the Governor 2018). The order establishes an additional statewide policy to achieve carbon neutrality by 2045 and maintain net negative emissions thereafter. As per Executive Order B-55-18, CARB is directed to work with relevant state agencies to develop a framework for implementation and accounting that tracks progress toward this goal and to ensure future Climate Change Scoping Plans identify and recommend measures to achieve the carbon neutrality goal. California is making progress towards the 2045 goal, however the pathway to carbon neutrality is still under development. According to CARB, there will be a strong reliance on energy efficiency, electrification, low carbon fuels (including low-carbon electricity), and CO_2 removal in future policies and strategies for reaching the ambitious goal. The path to carbon neutrality lies in striving for zero emissions from all new sources and maximum sequestration to offset existing sources.

Assembly Bill 1279 and 2022 Climate Change Scoping Plan

The Legislature enacted AB 1279 (CLI 2022), The California Climate Crisis Act, on September 16, 2022. AB 1279 establishes the policy of the State to achieve net zero GHG emissions, carbon neutrality, as soon as possible, but no later than 2045 and to achieve and maintain net negative GHG emissions thereafter. Additionally, AB 1279 ensures that by 2045 Statewide anthropogenic greenhouse gas emissions are reduced at least 85 percent below 1990 levels. SB 1279 also requires CARB to ensure that the 2022 Climate Change Scoping Plan identifies and recommends

measures to achieve carbon neutrality, and to identify and implement policies and strategies for carbon dioxide removal solutions and carbon capture, utilization, and storage technologies. It also requires CARB to submit an annual report on progress in achieving the Scoping Plan's goals.

The *2022 Scoping Plan for Achieving Carbon Neutrality* (2022 Scoping Plan), adopted by CARB in December 2022, updates and expands on prior scoping plans. This plan responds to more recent legislation, outlining a technologically feasible, cost-effective, and equity-focused path to achieve the state's climate target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045 and achieving carbon neutrality[1] by 2045 or earlier (CARB 2022a). The 2022 Scoping Plan outlines the strategies the state will implement to achieve carbon neutrality by reducing GHG emissions to meet the anthropogenic target, and by expanding actions to capture and store carbon through the state's natural and working lands and using a variety of mechanical approaches.

The major element of the 2022 Scoping Plan is the decarbonization of every sector of the economy. This effort requires the following key actions:

- Rapidly move to zero-emissions transportation for cars, buses, trains, and trucks.
- Phase out the use of fossil-fuel gas for heating.
- Clamp down on chemicals and refrigerants.
- Provide communities with sustainable options such as walking, biking, and public transit to reduce reliance on cars.
- Continue to build out solar arrays, wind turbine capacity, and other resources to provide clean, renewable energy to displace fossil-fuel–fired electrical generation.
- Scale up new options such as renewable hydrogen for hard-to-electrify end uses and biomethane where needed.

Despite these efforts, some amount of residual emissions will remain from hard-to-abate industries such as cement, internal combustion vehicles still on the road, and other GHG emissions sources, including high-GWP chemicals used as refrigerants. The 2022 Scoping Plan addresses the remaining emissions by re-envisioning natural and working lands (such as forests, shrublands/chaparral, croplands, and wetlands) to ensure that they incorporate and store as much carbon as possible. However, the modeling for the 2022 Scoping Plan indicates that natural and working lands, on their own, will not provide enough sequestration and storage to address all residual emissions. Therefore, it will be necessary to research, develop, and deploy additional methods of capturing CO_2 that include pulling it from smokestacks of facilities, or drawing it out of the atmosphere itself and then safely and permanently utilizing and storing it (CARB 2022a).

[1] *Carbon neutrality* means "net zero" emissions of GHGs. In other words, it means that GHG emissions generated by sources such as transportation, power plants, and industrial processes must be less than or equal to the amount of CO_2 that is stored, both in natural sinks and through mechanical sequestration. AB 1279 (discussed below) uses the terminology "net zero" and the 2022 Scoping Plan uses the terminology "carbon neutrality" or "carbon neutral." For purposes of this EIR, these terms mean the same thing and are used interchangeably.

The 2022 Scoping Plan shows that the state must take unprecedented and substantial action to achieve its climate goals, far beyond anything CARB has considered in prior scoping plans. In CARB's own words, the 2022 Scoping Plan "is the most comprehensive and far-reaching Scoping Plan developed to date" and "[m]odeling for this Scoping Plan shows that this decade must be one of transformation on a scale never seen before to set us up for success in 2045" (CARB 2022a).

The 2022 Scoping Plan includes the Scoping Plan Scenario, which "builds on and integrates efforts already underway to reduce the state's GHG, criteria pollutant, and toxic air contaminant emissions by identifying the clean technologies and fuels that should be phased in as the state transitions away from combustion of fossil fuels" (CARB 2022a). The 2022 Scoping Plan approaches decarbonization from two perspectives: (1) managing a phasedown of existing energy sources and technology and (2) ramping up, developing, and deploying alternative clean energy sources and technology over time. Under the Scoping Plan Scenario, the demand for liquid petroleum will decrease by 94 percent and total fossil fuels by 86 percent in 2045 relative to 2022 (CARB 2022a).

Additionally, carbon removal will be necessary to achieve net negative emissions to address historical GHGs already in the atmosphere. The 2022 Scoping Plan does not specify how the residual emissions will be removed, as this will require the development of new CCS and DAC technologies, which will require governmental or other incentive support to overcome technology and market barriers (CARB 2022a).

The 2022 Scoping Plan also discusses the role of local governments in meeting the state's GHG emissions reduction goals because local governments have jurisdiction and land use authority related to community-scale planning and permitting processes, local codes and actions, outreach and education programs, and municipal operations. The efforts of local governments to reduce GHG emissions within their jurisdictions are critical to achieving the state's long-term climate goals. Furthermore, local governments make critical decisions on how and when to deploy transportation infrastructure and can choose to support transit, walking, bicycling, and neighborhoods that allow people to transition away from cars; they can adopt building ordinances that exceed statewide building code requirements; and they play a critical role in facilitating the rollout of Zero Emission Vehicles (ZEV) infrastructure. The 2022 Scoping Plan encourages local governments to take ambitious, coordinated climate actions at the community scale—actions that are consistent with and supportive of the state's climate goals (CARB 2022a). These actions could include:

- Develop local Climate Action Plans (CAPS) and strategies consistent with the state's GHG emissions reduction goals.
- Incorporate state-level GHG emissions priorities into local governments' processes for approving land use and individual plans and individual projects.
- Implement CEQA mitigation, as needed, to reduce GHG emissions associated with new land use development projects.
- Leverage opportunities for regional collaboration.

Cap-and-Trade Program

The Climate Change Scoping Plan identifies a Cap-and-Trade Program as a key strategy CARB will employ to help California meet its GHG reduction targets for 2020 and 2030, and ultimately achieve an 80 percent reduction from 1990 levels by 2050. Pursuant to its authority under HSC Division 25.5, CARB designed and adopted a California Cap-and-Trade Program to reduce GHG emissions from major sources (deemed "covered entities") by setting a firm cap on statewide GHG emissions and employing market mechanisms to achieve the State's emission-reduction mandate of returning to 1990 levels of emissions by 2020 and 40 percent below 1990 levels by 2030 (17 CCR §§ 95800 to 96023). Under the Cap-and-Trade Program, an overall limit is established for GHG emissions from capped sectors (e.g., electricity generation, petroleum refining, cement production, and large industrial facilities that emit more than 25,000 metric tons CO_2e per year), caps decline over time, and facilities subject to the cap can trade permits to emit GHGs. The statewide cap for GHG emissions from the capped sectors commenced in 2013 and declines over time, achieving GHG emission reductions throughout the Program's duration (17 CCR §§ 95800 to 96023). On July 17, 2017, the California legislature passed AB 398, extending the Cap-and-Trade program through 2030.

The Cap-and-Trade Regulation provides a firm cap, ensuring that the 2020 statewide emission limit will not be exceeded. An inherent feature of the Cap-and-Trade Program is that it does not guarantee GHG emissions reductions in any discrete location or by any particular source. Rather, GHG emissions reductions are only guaranteed on a statewide basis.

If California's direct regulatory measures reduce GHG emissions more than expected, then the Cap-and-Trade Program will be responsible for relatively fewer emissions reductions. If California's direct regulatory measures reduce GHG emissions less than expected, then the Cap-and-Trade Program will be responsible for relatively more emissions reductions. In other words, the Cap-and-Trade Program functions similarly to an insurance policy for meeting California's GHG emissions reduction mandates.

Transportation Sector

In September 2020, Governor Newsom issued EO N-79-20 requiring sales of all new passenger vehicles to be zero-emissions by 2035, as well as additional measures to eliminate harmful emissions from the transportation sector. Following the EO, CARB will develop regulations to mandate that 100 percent of in-state sales of new passenger cars and trucks are zero-emission by 2035—a target which would achieve more than a 35 percent reduction in greenhouse gas emissions and an 80 percent improvement in NO_X emissions from cars statewide. In addition, the CARB will develop regulations to mandate that all operations of medium- and heavy-duty vehicles shall be 100 percent zero emission by 2045 where feasible, with the mandate going into effect by 2035 for drayage trucks. To ensure needed infrastructure to support zero-emission vehicles, the order requires state agencies, in partnership with the private sector, to accelerate deployment of affordable fueling and charging options. It also requires support of new and used zero-emission vehicle markets to provide broad accessibility to zero-emission vehicles for all Californians. The executive order will not prevent Californians from owning gasoline-powered cars or selling them on the used car market (Office of the Governor 2020).

Energy Sector

The CEC has adopted Energy Efficiency Standards for Residential and Nonresidential Buildings (CCR, Title 24, Part 6) to reduce energy consumption in the state. The standards are updated periodically (typically every three years) to allow for the consideration and inclusion of new energy efficiency technologies and methods, where the current California Building Energy Efficiency Standards (Title 24 standards) are the 2022 Title 24 standards, which became effective January 1, 2023. The 2022 Title 24 standards encourage efficient electric heat pumps, establish electric-ready requirements for new homes, expand solar photovoltaic and battery storage standards, strengthen ventilation standards, and more. Buildings whose permit applications are applied for on or after January 1, 2023, must comply with the 2022 standards (CEC 2022).

Part 11 of the Title 24 Building Energy Efficiency Standards is referred to as the California Green Building Standards (CALGreen) Code. The CALGreen Building Code establishes mandatory measures for new residential and non-residential buildings. The CALGreen Code includes mandatory measures for non-residential development related to site development, energy efficiency, water efficiency and conservation; material conservation and resource efficiency; and environmental quality. The 2022 CALGreen Code: revises standards for electric vehicle charging for new construction, primarily multi-family dwellings and hotels/motels, including increased requirements for electric vehicle (EV) parking spaces and electric vehicle supply equipment (EVSE) Level 2 chargers, establishes heat pumps as a baseline technology, strengthens ventilation standards, establishes electric-ready requirements for new homes, and sets minimum solar photovoltaic and battery energy storage capacity for high-rise multifamily and commercial buildings, including office buildings, grocery stores, and schools, and more (CBSC 2024).

On September 2018, Governor Jerry Brown signed SB 100, which is now known as the 100 Percent Clean Energy Act of 2018. The Act declares that CARB should plan for 100 percent total retail sales of electricity in California come from eligible renewable energy resources and zero-carbon resources by December 31, 2045. SB 100 also set interim goals, accelerating the Renewables Portfolio Standard (RPS), to 52 percent from renewable energy sources by 2027 and 60 percent by 2030.

The CPUC and the CEC jointly implement the RPS program. The CPUC's responsibilities include: (1) determining annual procurement targets and enforcing compliance; (2) reviewing and approving each investor-owned utility's renewable energy procurement plan; (3) reviewing contracts for RPS-eligible energy; and (4) establishing the standard terms and conditions used in contracts for eligible renewable energy.

Executive Order B-55-18

On September 10, 2018, Governor Brown signed EO B-55-18. This Executive Order set a new statewide goal to achieve carbon neutrality no later than 2045 and achieve and maintain net negative emissions thereafter. This goal is in addition to existing statewide GHG reduction targets.

Senate Bill 1383

This bill (Chapter 395, Statutes of 2016) creates goals for short-lived climate pollutant (SLCP) reductions in various industry sectors. The SLCPs included under this bill—including methane, fluorinated gases, and black carbon—are GHGs that are much more potent than carbon dioxide and can have detrimental effects on human health and climate change. SB 1383 requires the CARB to adopt a strategy to reduce methane by 40 percent, hydrofluorocarbon gases by 40 percent, and anthropogenic black carbon by 50 percent below 2013 levels by 2030. The methane emission reduction goals include a 75 percent reduction in the level of statewide disposal of organic waste from 2014 levels by 2025. In 2017, CARB adopted a SLCP Reduction Strategy to implement SB 1383 (CARB 2017).

Assembly Bill 1279

AB 1279 (Muratsuchi, also known as the California Climate Crisis Act) was approved by California Legislature and signed by Governor Newsom in September 2022. AB 1279 requires the State to both achieve net zero GHG emissions as soon as possible, but no later than 2045, and achieve and maintain net negative GHG emissions thereafter, and to ensure that by 2045, statewide anthropogenic GHG emissions are reduced to at least 85 percent below the 1990 levels. AB 1279 requires CARB to work with relevant State agencies to ensure that updates to the CARB scoping plan identify and recommend measures to achieve these policy goals and to identify and implement a variety of policies and strategies that enable carbon dioxide removal solutions and carbon capture, utilization, and storage technologies in California. Additionally, this bill would require the CARB to submit an annual report.

Senate Bill 1020

SB 1020, signed on September 16, 2022, revises SB 100 to require that renewable energy resources and zero-carbon resources supply 90 percent of all retail sales of electricity to end-use customers by December 31, 2035; 95 percent of all retail sales to end users by December 31, 2040; 100 percent of all retail sales to end users by December 31, 2045; and 100 percent of electricity procured to serve all state agencies by December 31, 2035.

Assembly Bill 1757

AB 1757 of 2022 requires the CNRA, by January 1, 2024 acting in collaboration with CARB, CalEPA, the California Department of Food and Agriculture, and an expert advisory committee to set targets for natural carbon sequestration and nature-based climate solutions for 2030, 2038, and 2045. The targets must be integrated into the Scoping Plan and other state policies. CARB must ensure that double-counting of emissions reductions is avoided. Emissions reduction projects and actions that receive state funding will not be eligible to generate credits under any market-based compliance mechanism. CARB, by January 1, 2025, must develop standard methods for state agencies to track GHG emissions and reductions, carbon sequestration, and, where feasible, additional benefits from natural and working lands over time. The CNRA, by January 1, 2025 acting in collaboration with CARB, CalEPA, and the California Department of Food and Agriculture must review and update the Climate Smart Strategy to achieve the targets, and must post data on its website on progress made toward targets, including on state expenditures made to implement the targets.

Senate Bill 1206

SB 1206 of 2022 prohibits the sale or distribution of bulk HFC gases or bulk blends containing HFCs that exceed 2,200 GWP in 2025, 1,400 GWP in 2030, and 750 GWP in 2033, unless the HFCs are reclaimed or for use in medical metered-dose inhalers. SB 1206 also requires the state to use reclaimed refrigerant with a GWP greater than 750 to service existing equipment owned/operated by the state, starting in 2025. Additionally, SB 1206 requires CARB to initiate a rulemaking requiring low- and ultra-low-GWP alternatives to HFCs in all sectors where it is practicable for entities in the sector to comply with the requirement.

Senate Bill 27

SB 27 of 2021 requires the CNRA, in coordination with other state agencies, to establish the Natural and Working Lands Climate Smart Strategy by July 1, 2023. SB 27 also requires CARB to establish specified CO2 removal targets for 2030 and beyond as part of its Scoping Plan. Under SB 27, the CNRA must establish and maintain a registry to identify projects in the state that drive climate action on natural and working lands and are seeking funding. The CNRA also must track carbon removal and GHG emissions reduction benefits derived from projects funded through the registry. This law is reflected in the 2022 Scoping Plan as CO2 removal and carbon capture targets of 20 MMTCO2e by 2030 and 100 MMTCO2e by 2045 in support of carbon neutrality.

Senate Bill 596

SB 596 of 2022 requires CARB to develop a comprehensive strategy for the state's cement sector by July 1, 2023, to achieve net zero GHG emissions associated with the use of cement in the state as soon as possible, but no later than December 31, 2045. The law establishes an interim target of 40 percent below the 2019 average GHG intensity of cement by December 31, 2035. Under SB 596, CARB must take all of the following actions:

- Define a metric for GHG intensity and establish a baseline from which to measure GHG intensity reductions.
- Evaluate the feasibility of the 2035 interim target (40 percent reduction in GHG intensity) by July 1, 2028.
- Coordinate and consult with other state agencies.
- Prioritize actions that leverage state and federal incentives.
- Evaluate measures to support market demand and financial incentives to encourage the production and use of cement with low GHG intensity.

California Air Pollution Control Officers Association

The California Air Pollution Control Officers Association (CAPCOA) published the *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity* (2021 GHG Handbook) in December of 2021 (CAPCOA 2021). CAPCOA prepared this 2021 GHG Handbook to provide a common platform of information and tools for evaluating GHG reduction measures, climate vulnerabilities and promoting equity to support sustainable, resilient, and equitable land use planning and project design. The 2021 GHG Handbook was prepared in collaboration with academia, agencies, community organizations and

leaders, local governments, nongovernmental organizations, and technical experts. The quantification methods, tools, and recommendations provided in this 2021 GHG Handbook were developed based on the latest science and literature available at the time of publication and have been incorporated into CalEEMod Version 2022.

Regional

South Coast Air Quality Management District

After AB 32 was passed, SCAQMD formed a Climate Change Committee along with a Greenhouse Gases CEQA Significance Thresholds Working Group and the SoCal Climate Solutions Exchange Technical Advisory Group. On September 5, 2008, the SCAQMD Board approved the SCAQMD Climate Change Policy, which outlines actions the SCAQMD will take to assist businesses and local governments in implementing climate change measures, decrease the agency's carbon emissions, and provide information to the public regarding climate change (SCAQMD 2008b).

In order to provide guidance to local lead agencies on determining the significance of GHG emissions identified in CEQA documents, the GHG CEQA Significance Threshold Working Group drafted thresholds with the intent of capturing 90 percent of development projects ((SCAQMD 2008a; SCAQMD 2008c; SCAQMD 2010). Under Tiers 1 and 2, projects that are exempt from CEQA or consistent with an approved local GHG reduction plan can be found to be less than significant. Under Tier 3, a project's GHG emissions are compared to the draft screening thresholds. At present, the SCAQMD has not formally adopted thresholds for use by other lead agencies, but recommends that industrial projects utilize the 10,000 $MTCO_2e$ screening level that has been adopted for SCAQMD projects. The GHG CEQA Significance Threshold Working Group has drafted a significance indicator of 3,000 $MTCO_2e$ for mixed-use or all land use projects, but it has not been formally adopted. Under Tier 4, for larger projects that do not meet any of the above screening thresholds, a plan's GHG emissions are compared to a performance standard, such as achieving a percentage reduction in GHG emissions from a base case scenario or achieving a efficiency target of 6.6 MTCO2e per service population (SP) annually for 2020 and 4.1 MT CO2e per SP annually for 2035. Service population equals the total number of residents and employees within a development. Under Tier 4 for the local project-level, a project's GHG emissions are compared to a performance standard, such as achieving a percentage reduction in GHG emissions from a base case scenario or achieving a efficiency target of 4.8 MTCO2e per service population (SP) annually for 2020 and 3.0 MT CO2e per SP annually for 2035. Service population equals the total number of residents and employees within a development.

The SCAQMD flowchart uses a tiered approach in which a project is deemed to have a less than significant impact related to GHG emissions when any of the following conditions are met:

- GHG emissions are within GHG budgets in an approved regional plan;
- Incremental increases in GHG emissions due to the project are below the defined Significance Screening Levels, or Mitigated to Less than the Significance Screening Level;

- Performance standards are met by incorporating project design features and/or implementing emission reduction measures; and
- Carbon offsets are made to achieve target significance screening level.

Southern California Association of Governments

On April 4, 2024, the SCAG's Regional Council formally adopted Connect SoCal 2024 (SCAG 2024a), which is an update to the previous Connect SoCal 2020. Using growth forecasts and economic trends, both the Connect SoCal 2020 and Connect SoCal 2024 provide a vision for transportation throughout the region for the next several decades by considering the role of transportation in the broader context of economic, environmental, and quality-of-life goals for the future and identifying regional transportation strategies to address mobility needs. Connect SoCal 2024 describe how the region can attain the GHG emission-reduction targets set by CARB by achieving reductions in per-capita transportation GHG emissions of 8 percent by 2020 and 19 percent by 2035, compared to the 2005 level (SCAG 2024a). Compliance with and implementation of Connect SoCal 2024 policies and strategies would have the co-benefit of reducing per capita criteria air pollutant emissions (e.g., nitrogen dioxide, carbon monoxide, etc.) associated with reduced per capita VMT.

Connect SoCal 2024 states that the SCAG region was home to approximately 19 million people in 2019 and included approximately 6.2 million homes and approximately 9 million jobs (SCAG 2024a). By 2050, the integrated growth forecast projects that these figures will increase by 2 million people, with approximately 1.6 million more homes and 1.3 million more jobs (SCAG 2024a). Connect SoCal 2024 will add 181,200 new miles of transit service, 4,000 new miles of bike lanes and 869 new miles to the Regional Express Lane Network (SCAG 2024a). Priority Development Areas (PDAs), which are defined in Connect SoCal 2024 as areas where people have access to multiple modes of transportation or where trip origins and destinations are closer together allowing for shorter trips, will accommodate approximately 66 percent of new households and 54 percent of new jobs between 2019 and 2050 (SCAG 2024a). PDAs include Neighborhood Mobility Areas (NMAs), Transit Priority Areas (TPAs), and Livable Corridors, and Spheres of Influence (SOIs) (unincorporated areas only).

NMAs include intersection density, low-speed streets, land use diversity, and accessibility to amenities within one-mile using street network distances to improve, restore and enhance safe and convenient connections to schools, hospitals, shopping, services, places of worship, parks, greenways, and other destinations. TPA's are areas within one half mile of existing or planned major transit stops. Livable Corridors are areas where local jurisdictions can plan and zone for increased density at nodes along key corridors and redevelop single-story underperforming retail with well-designed, higher-density housing and employment centers. SOIs are existing or planned service areas within the planning boundary outside of an agency's legal boundary in unincorporated areas to promote the efficient, effective, and equitable delivery of local and regional services for existing and future residents and to encourage a collaborative process between agencies.

Connect SoCal 2024's overall land use pattern reinforces the trend of focusing new housing and employment in the region's PDAs. PDAs are a development pattern that demonstrates how the

region can sustainably accommodate needed housing by supporting transportation and land use strategies that achieve California's GHG emission reduction goals. Connect SoCal 2024 strives to increase housing production, improve equity and resilience, preserve natural lands, improve public health, increase transportation safety, support the goods movement industries, and use resources more efficiently.

Connect SoCal 2024 provides specific strategies for implementation. These strategies include implementing the development of Complete Streets that comprise a safe, multimodal network with flexible use of public rights-of-way for people of all ages and abilities using a variety of modes (e.g., people walking, biking, rolling, driving, taking transit); encouraging residential development in areas surrounding existing and planned transit/rail stations; promoting growth in PDAs with a focus on future housing and population growth in areas with existing and planned urban infrastructure including transit and active transportation to reduce single occupancy vehicles; encouraging housing in areas with access to community infrastructure and that are close to transit and walkable; and promoting 15-minute communities (areas where residents can access there day-to=day needs within a 15-minute walk, bike ride or roll from their home (SCAG 2024a).

In addition, Connect SoCal 2024 includes strategies to promote active transportation, support local planning and projects that serve short trips, promote transportation investments, investments in active transportation, prioritize climate mitigation, adaption, resilience and economic benefits of natural and working lands, and prioritize the most vulnerable populations and communities subject to climate hazards, promote sustainable water use planning, practices and storage, promote sustainable development, and reduce air pollutants and GHG emissions to improve air quality. CARB has accepted SCAG's GHG emissions quantification determinations as presented in Connect SoCal 2024 for future GHG emission reduction targets (SCAG 2024a).

Connect SoCal 2024's GHG emissions reduction target is more dependent on policies and programs than on capital projects, but it is projected to meet the 2035 target of 19 percent below 2005 levels (SCAG 2024a). SCAG achieved the 8 percent GHG emissions reduction from 2005 levels by 2020; however, the decreased travel during the COVID-19 shutdown most likely helped achievement of the 2020 target (SCAG 2024a).

Local

Los Angeles County 2045 Climate Action Plan

The County's Board of Supervisors adopted the Los Angeles County 2045 Climate Action Plan (2045 CAP) on June 25, 2024 (County of Los Angeles 2024a). The 2045 CAP is an update to the Unincorporated Los Angeles County Community Climate Action Plan (CCAP) 2020 and sets new GHG emissions reduction targets for 2030 (40 percent below 2015 levels), 2035 (50 percent below 2015 levels), and 2045 (83 percent below 2015 levels) consistent with State goals and sets a long-term aspirational goal for carbon neutrality by 2045. The 2045 CAP includes five categories for GHG emissions reductions: (1) energy supply, (2) transportation, (3) building energy and water, (4) waste, and (5) agriculture, forestry, and other land uses. Under these categories, there are 10 strategies and 25 measures that, when combined, achieve all three of the

GHG emissions reduction targets for 2030, 2035, and 2045. These strategies and measures are estimated to reduce annual GHG emissions by more than 1.5 million $MTCO_2e$ in 2030, more than 2 million $MTCO_2e$, and nearly 3 million $MTCO_2e$ in 2045.

OurCounty Los Angeles County Sustainability Plan

In August 2019, the County adopted the OurCounty Sustainability Plan which contains 12 cross-cutting goals, 37 strategies, and 159 actions and identifies entities and partners which will work together to achieve these goals (County of Los Angeles 2019). The OurCounty Sustainability Plan focuses on enhancing the well-being of every community in the County while reducing damage to the natural environment and adapting to the changing climate. The OurCounty goals are as follows:

Goal 1: Resilient and healthy community environments where residents thrive in place. The County will protect vulnerable communities from pollution, reduce health and economic inequalities, ensure access to safe, clean, and affordable water, and support more resilient and inclusive communities.

Goal 2: Buildings and infrastructure that support human health and resilience. Old and new buildings and infrastructure will utilize more efficient technologies and practices that reduce resource use, improve health, and increase resilience.

Goal 3: Equitable and sustainable land use and development without displacement. Utilize policy tools, such as anti-displacement measures, so existing community members can remain in and strengthen their neighborhoods and networks while accepting new residents through more compact, mixed-use development. Pursue outcomes that are inclusive, safe, healthy, accessible, and transit oriented.

Goal 4: A prosperous LA County that provides opportunities for all residents and businesses and supports the transition to a green economy. Support the growth of green economy sectors through procurement practices, land use authority, and various economic and workforce development incentives.

Goal 5: Thriving ecosystems, habitats, and biodiversity. Ensure that our ecosystems, including urban habitats, thrive even as our region becomes increasingly urbanized through careful planning.

Goal 6: Accessible parks, beaches, recreational waters, public lands, and public spaces that create opportunities for respite, recreation, ecological discovery, and cultural activities. Make parks and public lands more accessible and inclusive and manage them so that all residents may enjoy their benefits.

Goal 7: A fossil fuel-free LA County. Move towards a zero-carbon energy system that reduces GHG emissions by eliminating fossil fuel production in the County. By addressing sources of pollution, air will be cleaner for the residents and the imminent dangers from the magnitude of climate change will be limited.

Goal 8: A convenient, safe, clean, transportation system that enhances mobility and quality of life while reducing car dependency. Provide a modern transportation system for all ages and abilities to access reliable, safe, affordable, and varied mobility choices that reduce pollution. Develop programs that focus on reducing the number of vehicle miles

travelled, including transit systems, walking, biking, e-scooters, and zero-emission car-share services.

Goal 9: Sustainable production and consumption of resources. Improve our ability to promote integrative and collaborative solutions at the local and regional levels to effectively manage the County's waste, water, energy, and material resources into the future.

Goal 10: A sustainable and just food system that enhances access to affordable, local, and healthy food. Improve access to healthy food within County boundaries while optimizing purchasing power and business services to make food production more sustainable through leveraging of capital assets, public services, and regulatory authority.

Goal 11: Inclusive, transparent, and accountable governance that encourages participation in sustainability efforts, especially by disempowered communities. Build stronger communities and better-informed policy and programs by creating a more inclusive and accountable governance structure. This will ensure equity in sustainability policies and programs by having diverse representation in development, implementation, and management.

Goal 12: A commitment to realize OurCounty sustainability goals through creative, equitable, and coordinated funding and partnerships. Work with partners across the public, private, and nonprofit sectors for a more sustainable future through funding opportunities and leveraging of purchasing power.

The plan is intended to help guide decision-making in unincorporated County areas and to provide a model for decision-making in the 88 incorporated cities in the County. As a strategic plan, the OurCounty Sustainability Plan does not supersede land use plans that have been adopted by the Regional Planning Commission and Board of Supervisors, including the Los Angeles County General Plan.

County of Los Angeles General Plan

The County of Los Angeles 2035 General Plan is an applicable guiding policy document for the Project site. The County of Los Angeles Board of Supervisors adopted the Los Angeles County 2035 General Plan on October 6, 2015 with the most recent update on July 14, 2022. The 2035 General Plan is intended to provide policy framework for development within the County through the year 2035. The Los Angeles County General Plan 2035 provides the fundamental basis for the County's land use and development policy, and represents the basic community values, ideals, and aspirations to govern a shared environment through 2035. The General Plan addresses all aspects of development including public health, land use, community character, transportation, economics, housing, air quality, and other topics. The General Plan sets forth objectives, policies, standards, and programs for land use and new development, Circulation and Public Access, and Service Systems for the Community as a whole.

The County does not have a General Plan Element specific to climate change and GHG emissions. However, the following goals and policies from the Los Angeles County General Plan Air Quality and Mobility Elements would also lead to GHG emission reductions. These goals and policies will be implemented in connection with development of the Proposed Project (County of Los Angeles 2024b; County of Los Angeles 2022).

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

Policy AQ 3.4: Participate in local, regional, and state programs to reduce greenhouse gas emissions.

Policy AQ 3.5: Encourage energy conservation in new development and municipal operations.

Policy AQ 3.6: Support rooftop solar facilities on new and existing buildings.

Goal M 4 An efficient multimodal transportation system that serves the needs of all residents.

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

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

Los Angeles County Code

Energy

The County has adopted by reference, Sections 102 through 119 of Chapter 1 of Title 26 of the Los Angeles County Code as Title 31 Green Building Standards Code of the Los Angeles County Code. The Green Building Code increases energy and water efficiency and reduces waste generation. The Green Building Code has co-benefits of reducing criteria pollutant emissions through the increase in energy efficiencies, which reduces building energy demand and the combustion of natural gas within buildings.

Water

As part of state and regional efforts towards water conservation, Titles 11 and 12 of the Los Angeles County Code includes requirements for water conservation and sustainability. The Code requires recirculating water required for water fountains and decorative water features and commercial conveyor carwashes and the use of recycled or approved non-potable water for construction purposes. It is recommended that large, landscaped areas such as parks, cemeteries, golf courses, school grounds, and playing fields use irrigation systems with rain sensors that automatically shut off such systems during periods of rain or irrigation timers which automatically use information such as evapotranspiration sensors to set an efficient water schedule.

Solid Waste

Title 20 of the Los Angeles County Code contains provisions that implement the source reduction and recycling programs and other measures to achieve per capita waste generation for disposal in accordance with state programs. The County requires all collectors operating under a collection franchise within the County to comply with applicable resource recovery and diversion programs to minimize solid waste disposal at landfills.

On November 16, 2021, the Los Angeles County Board of Supervisors adopted the Mandatory Organic Waste Disposal Reduction Ordinance. The Ordinance ensures everyone does their part in diverting organic waste and edible food from landfills to reduce emissions of methane and the impacts on climate change. The Ordinance is also required per State Senate Bill 1383 regulations.

3.8.5 Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines and the County of Los Angeles Environmental Checklist Form, the Proposed Project could have a significant impact related to greenhouse gas emissions if it would:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment (see Impact 3.8-1, below).
- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases (see Impact 3.8-2, below).

The increased concentration of GHGs in the atmosphere has been linked to global warming, which can lead to climate change. Therefore, construction and operation of the development projects under the Specific Plan Program would incrementally contribute to GHG emissions along with past, present, and future activities, and the CEQA Guidelines acknowledge this as a cumulative impact. As such, impacts of GHG emissions are analyzed here on a cumulative basis.

Adopted in December 2010, the CEQA Guideline Amendments state that each local lead agency must develop its own significance criteria based on local conditions, data, and guidance from public agencies and other sources. However, neither the SCAQMD, CEQA Guidelines, nor the County of Los Angeles has provided adopted numeric thresholds of significance for greenhouse gas emissions. In the case where no adopted numeric guidelines are available, the Office of Planning and Research (OPR), the agency that develops the CEQA Guidelines, encourages the lead agency to use programmatic mitigation plans and programs to tier individual project analysis.

Under CEQA, it is up to the Lead Agency to determine which thresholds of significance and methodology to use in evaluating a project. Typically, the Lead Agency adopts the thresholds of the air district which has jurisdiction over a project. While SCAQMD has issued proposed standards and guidelines, there is no adopted state or local standard for determining the cumulative significance of the proposed Proposed Project's GHG emissions. As stated above, Under Tier 4, the SCAQMD has proposed efficiency thresholds for local project-level documents of 4.8 MT CO2e per service population (SP) annually for 2020, and 3.0 MT CO2e per SP annually for 2035. Service population equals the total number of residents and employees within a development. The screening threshold represents the level of GHG emissions under which a project would be considered to have a less-than-significant impact on the environment without the need for further mitigation. These draft threshold options are being evaluated through the GHG Thresholds Working Group and have not been formally adopted.

For the purposes of this analysis, SCAQMD's proposed performance standards for planning level documents are used. The performance standards are 4.8 MT CO_2e per service population annually for 2020 and 3.0 MT CO2e per service population annually for 2035. The service population is the total of all residents and employees within the Proposed Project. The screening threshold represents the level of GHG emissions under which a project would be considered to have a less than significant impact on the environment without further need of mitigation.

3.8.6 Impact Analysis

Greenhouse Gas Emissions

Impact 3.8-1: The Specific Plan Program and Proposed Project would result in less than significant and less than cumulatively considerable effects associated with the generation of greenhouse gas emissions.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Final PEIR stated that the Specific Plan Program would generate GHG emissions over a period of short-term (construction) and long-term (operation) activities. As discussed in the Final PEIR, the Specific Plan Program activities would result in greenhouse gas emissions from construction activities as well as long-term mobile, area, and operational sources. The net GHG emissions identified estimated for the Specific Plan Program included various Specific Plan Program design features. These features include the establishment of a transit-oriented development (TOD) that includes mixed uses on the Specific Plan Program site. The Specific Plan Program includes sustainable design guidelines that include site designs for buildings to be sited and maximize the use of sunlight and shade for energy savings, clustering of buildings for shade, use of green roofs and providing drought tolerant plants to reduce water use. The TOD Specific Plan Program area is largely within walking distance of a Metro station serving the Green (Metro C-Line) and Blue (Metro A-Line) lines, has local bus routes and will provide bicycle and pedestrian facilities within the Specific Plan Program area. The average daily vehicle trips (ADTs) have been reduced based on these features and the vehicle miles traveled identified above have been reduced based on the ADTs.

The Final PEIR stated that the Specific Plan Program found that even with implementation of Mitigation Measures AIR-1 through AIR-7, that would reduce potential GHG emissions, emissions would remain significant. Mitigation Measures AIR-1 and AIR-2 presented in the Final PEIR Section 3.2, Air Quality would reduce GHG emissions within the Specific Plan Program area, and include the use of more efficient construction equipment, which would reduce the combustion of fuels associated with construction. These mitigation measures reduce the amount of GHG's that would be generated and emitted through the construction and day to day operation of the Specific Plan Program. Mitigation Measures AIR-3 through AIR-6 would reduce the burning of wood or fossil fuels, use low-VOC coatings and cleaning supplies, and potentially use electrical landscaping equipment, all of which reduce operational GHGs. Mitigation Measure AIR-7 would reduce energy consumption through making the development operation more energy efficient. The proposed Specific Plan Program's total net annual GHG emissions would be approximately 63,899 $MTCO_2e$ per year. Given a service population (SP)(total net increase of residents and jobs at buildout) increase of 11,410, annual GHG emissions per SP population for the proposed Specific Plan Program would be 5.6 $MTCO_2e$/SP. This would not exceed the SCAQMD's proposed efficiency level of 6.6 $MTCO_2e$/SP for 2020 but would exceed SCAQMD's proposed efficiency level of 4.1 $MTCO_2e$/SP for 2035, as shown in Table 3.5-2. Therefore, the net increase in GHG emissions resulting from implementation of the Specific Plan Program would be significant for 2035 with mitigation.

Cumulative

The Final PEIR stated that in accordance with SCAQMD methodology, the analysis of GHG impacts is by its nature a cumulative assessment. Therefore, while implementation of Mitigation Measures AIR-1 through AIR-7 would reduce potential GHG emissions; the Final PEIR determined GHG emissions from the Specific Plan Program would remain cumulatively considerable.

Proposed Project Evaluation

Proposed Project-Specific

Construction

The emissions of GHGs associated with construction of the Proposed Project were calculated for each year of construction activity using the California Emissions Estimator Model (CalEEMod). Results of the GHG emissions calculations are presented in **Table 3.8-3,** *Estimated Proposed Project Construction-Related Greenhouse Gas Emissions*. It should be noted that the GHG emissions shown in Table 3.8-3 are based on construction equipment operating continuously throughout the workday. In reality, construction equipment tends to operate periodically or cyclically throughout the workday. Therefore, the GHG emissions shown reflect a conservative estimate. As a best management practice, the Applicant will implement a sustainable feature related to Tier 4 construction equipment and alternative technologies to reduce construction emissions. These features of the Proposed Project are discussed in Section 2.4.8 of this Addendum to Final PEIR and restated below.

- Construction Equipment. As a best management practice and sustainable feature of the Proposed Project, the construction contractors for each individual development area will use construction equipment that have engines of 25 horsepower (hp) or greater that complies with USEPA Tier 4 Final non-road engine standards and use electric welders during building construction.

A complete listing of the equipment by phase, emission factors, and calculation parameters used in this analysis is included within the emissions calculation worksheets that are provided in Appendix E to this Addendum to Final PEIR.

Although GHGs are generated during construction and are accordingly considered one-time emissions, it is important to include them when assessing all of the long-term GHG emissions associated with a project. Draft SCAQMD GHG analysis methodologies recommend that construction-related GHG emissions be amortized over a project's 30-year lifetime in order to include these emissions as part of a project's annualized lifetime total emissions, so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies (SCAQMD 2008c). In accordance with this methodology, the Proposed Project's estimated construction GHG emissions have been amortized over a 30-year period and are included in the Proposed Project's annualized operational GHG emissions.

Due to the potential persistence of GHGs in the environment, impacts are based on annual emissions and, in accordance with draft SCAQMD methodology, construction-period impacts are not assessed for significance independent of operational-period impacts, which are discussed in the next section.

Exhibit F

TABLE 3.8-3
ESTIMATED PROPOSED PROJECT CONSTRUCTION-RELATED GREENHOUSE GAS EMISSIONS

Emission Source	CO_2e Emissions (MT/yr.)
2025	387
2026	461
2027	449
2028	669
2029	350
2030	511
2031	404
2032	854
2033	389
2034	469
2035	393
2036	408
Total Construction Emissions	**5,744**
Amortized Construction Emissions (30 years)	**191**

NOTES:
CO_2e= carbon dioxide equivalent; MT/yr = metric tons per year.
SOURCE: ESA 2024

Operation

The Proposed Project's operational emissions were estimated using the CalEEMod software. Maximum annual GHG emissions resulting from motor vehicles, energy (i.e., electricity), water conveyance and wastewater treatment, and solid waste were calculated when the construction of all of the development areas are completed (reasonable worst-case assumption is the year 2037). As discussed in Chapter 2, Project Description of this Addendum to Final PEIR, the Project site is currently vacant. Also as discussed in Chapter 2, Project Description of this Addendum to Final PEIR, the Project site would include Sustainable Features of: EV installed and capable parking spaces for residential and non-residential spaces in accordance with the current versions of the CALGreen Code and the Los Angeles County Code at the time of building permit issuance and a solar photovoltaic (PV) system in accordance with the current version of Title 24 at the time of building permit issuance. Currently, the 2022 version of Title 24 requires a70% electricity offset of residential components. This offset was accounted for in the Proposed Project operational GHG emissions calculations. Mobile source emissions are estimated based on the predicted number of trips generated by the Proposed Project determined by the Proposed Project's Transportation Assessment Study (Raju Associates, Inc 2023). The GHG emissions resulting from operation of the Proposed Project are shown in **Table 3.8-4**, *Estimated Maximum Proposed Project Operational Greenhouse Gas Emissions*. [2]

[2] As shown in Table 3.8-4, operational GHG emissions would be below the SCAQMD efficiency thresholds without mitigation, but would be further reduced with the implementation of Mitigation Measure AIR-6 through AIR-7.

TABLE 3.8-4
ESTIMATED MAXIMUM UNMITIGATED PROPOSED PROJECT OPERATIONAL GREENHOUSE GAS EMISSIONS

Emissions Source	($MTCO_2e$/year)
Operational Emissions	
Mobile	1,988
Area	21
Energy	1,276
Water	59
Waste	248
Solar PV	(204)
Amortized Construction Emissions[a]	191
Total Net Increase in emissions (Construction and Operational Emissions)	**3,579**
Service Population (SP)[b]	1,581
$MTCO_2e$/ SP/year	2.3
Greater than 3.0 $MTCO_2e$/SP annual threshold for 2035?	**No**

NOTES:
a. The total construction GHG emissions were amortized over 30 years and added to the operational GHG emissions of the Proposed Project
b. Service population derived from the Proposed Project's Water Supply Assessment (see Appendix J of this Addendum to Final PEIR)
SOURCE: ESA, 2024

As shown in Table 3.8-2, the Proposed Project's total net annual GHG emissions would be approximately 3,579 $MTCO_2e$ per year (detailed calculations are included in Appendix E of this Addendum to Final PEIR). Given a service population (SP) (total net increase of residents and jobs at buildout) increase of 1,581, annual GHG emissions per SP population for the Proposed Project would be 2.3 $MTCO_2e$/SP. This would not exceed the Specific Plan Program's efficiency target level of 3.0 $MTCO_2e$/SP for 2035, as shown in Table 3.5-2. Therefore, the net increase in GHG emissions resulting from implementation of the Proposed Project would be less than significant.

Cumulative

Cumulative development in vicinity of the Proposed Project could generate GHG emissions that could result in significant impacts. Because the Proposed Project would result in less than significant GHG emission impacts, the Proposed Project's contribution to cumulative GHG emissions would be less than cumulatively considerable.

Applicable Mitigation Measures for the Proposed Project

Unlike the Specific Plan Program, mitigation measures are not required for the Proposed project related to the generation of GHG emissions. Therefore, Mitigation Measures AIR-1 through AIR-7 that are required for the Specific Plan Program would not be required for the Proposed Project.

Conclusion

Unlike with the Specific Plan Program, the Proposed Project would result in less than significant GHG emissions impacts with respect to the GHG emissions. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3), showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Conflict with Plan, Policy, or Regulation that Reduces Greenhouse Gas Emissions

Impact 3.8-2: The Specific Plan Program and Proposed Project would result in less than significant and less than cumulatively considerable effects with respect to conflict with applicable plans, policies, or regulations adopted for the purpose of reducing greenhouse gas emissions.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Final PEIR concluded that Specific Plan GHG emissions would not exceed the SCAQMD's proposed efficiency level of 6.6 $MTCO_2e$/SP for 2020, as shown in Table 3.5-2, and therefore, would be in compliance with AB 32.

In addition, the Final PEIR concluded that all new developments within the proposed Specific Plan Program area would be required to provide all mandatory green building measures for new developments under the CALGreen Code; that the Specific Plan Program would be an infill development that would make use of the existing circulation and utility infrastructure. In addition, the Specific Plan Program would also introduce high-density residential uses, thus creating a mixed-use environment in which residents would benefit from nearby shopping and employment opportunities. The new development would be within walking distance of the Willowbrook/Rosa Parks Station, which would encourage users of the Specific Plan Program area to use public transportation, and thereby would reduce GHG emissions. Furthermore, the Specific Plan Program would implement a transit-oriented development through the introduction of mixed uses, provision of non-vehicular modes of transportation and creating a pedestrian-friendly environment. Because the Specific Plan Program implements the transit-oriented development policies established by the County, the Specific Plan Program is considered consistent with the County's land use policies. Lastly, the Specific Plan Program would include sustainable design techniques such as the use of solar panels, building orientations, and use of trees to provide shading of structures to conserve energy. The design techniques also include interconnected and safe bicycle- and pedestrian-friendly access through the provision of bicycle and pedestrian paths to activity centers and neighborhoods and an efficient multimodal transportation network through the improvement of roadway rights-of-way by providing safe bicycle and pedestrian paths throughout the Specific Plan Program area including to the onsite Willowbrook/Rosa Parks

Station. The Specific Plan Program also includes implementing plans to reduce climate change impacts through the implementation of a transit-oriented development with the introduction of mixed uses. Based on the above, the Final PEIR concluded that the Specific Plan Program would not conflict with the current approved reduction goals identified in AB 32, consistent with the Scoping Plan measures through incorporation of green building measures, consistent with the greenhouse gas emission reduction policies in the SCAG SCS, and consistent with the County's land use and greenhouse gas reduction policies. Therefore, the Specific Plan Program would not conflict with applicable plans, policies or regulations adopted for the purpose of reducing the emissions of GHGs, and impacts would be less than significant.

Cumulative

The Final PEIR determined the analysis of plans, policies and regulations that reduces greenhouse gas emissions is by its nature a cumulative assessment. Therefore, the Specific Plan Program would have a less than cumulatively considerable contribution to cumulative significant impacts.

Proposed Project Evaluation

Proposed Project-Specific

CARB's Climate Change Scoping Plan

The CARB *2022 Scoping Plan For Achieving Carbon Neutrality* was approved in December 2022 and expands on prior scoping plans and recent legislation, such as AB 1279, by outlining a technologically feasible, cost-effective, and equity-focused path to achieve the state's climate target of reducing anthropogenic GHG emissions to 85 percent below 1990 levels and achieving carbon neutrality by 2045 or sooner (CARB 2022a). To achieve carbon neutrality by 2045, the 2022 Scoping Plan contains GHG emissions reductions, technology, and clean energy mandated by statutes; reduction of short-lived climate pollutants; and mechanical CO_2 capture and sequestration actions.

The 2022 Scoping Plan outlines a framework that relies on a broad array of GHG reduction actions, which include direct regulations, alternative compliance mechanisms, incentives, voluntary actions, and market-based mechanisms, such as the Cap-and-Trade program. The 2022 Scoping Plan builds off of a wide array of regulatory requirements that have been promulgated to reduce Statewide GHG emissions, particularly from energy demand and mobile sources. While these regulatory requirements are not targeted at specific land use development projects, they would indirectly reduce a development project's GHG emissions.

Certain elements of these regulations must be complied with by all projects that develop urban land uses (e.g., commercial, residential, industrial). This category of regulations can be grouped in terms of the GHG sector that benefits from their implementation. With regard to the energy sector, implementation of the California RPS program and SB 100, would reduce GHG emissions generated by energy consumption. With regard to the mobile sector, implementation of the Advanced Clean Cars Program, LCFS, and SB 375 would reduce GHG emissions generated by motor vehicle travel. In addition, ongoing implementation of the Cap-and-Trade Program would reduce GHG emissions from both energy consumption and the fuels used for motor vehicle travel. With regard to the solid waste sector, implementation of the California Integrated Waste Management Act of 1989 and AB 341 would reduce GHG emissions generated by solid waste

disposal in terms of reduced vehicle trips associated with the transport of solid waste materials as well as landfill emissions. Further, Proposed Project development would occur in accordance with these regulations and, therefore, would comply with their requirements and would not conflict with the implementation of these regulations.

In addition, as explained above, the CARB 2022 Scoping Plan expands on prior Scoping Plans and recent legislations, such as AB 1279, by outlining a technologically feasible, cost-effective, and equity-focused path to achieve the state's climate target of reducing anthropogenic GHG emissions to 85 percent below 1990 levels and achieving carbon neutrality by 2045 or earlier (CARB 2022). To achieve carbon neutrality by 2045, the 2022 Scoping Plan contains GHG reductions, technology, and clean energy mandated by statutes, reduction of short-lived climate pollutants, and mechanical carbon dioxide capture and sequestration actions.

Appendix D of the CARB 2022 Scoping Plan (CARB 2022b) discusses local Project-level key attributes that individual residential and mixed-use projects within the State can implement that would accommodate growth in a manner consistent with the State's GHG reduction and equity prioritization goals. **Table 3.8-5**, *Consistency with Applicable Scoping Plan Greenhouse Gas Reduction Strategies*, contains a consistency analysis of the project-level attributes from the 2022 Scoping Plan Appendix D.

As shown in Table 3.8-5, the Proposed Project would not conflict with many key project attributes included in the 2022 Scoping Plan and would implement project design features and incorporate additional characteristics to reduce energy, conserve water, reduce waste generation, and reduce vehicle travel, consistent with statewide strategies and regulations, which would reduce GHG emissions. Thus, because the Proposed Project would not conflict with key project attributes in Appendix D of the CARB 2022 Scoping Plan, the Proposed Project would not conflict with the strategies applicable to the Proposed Project in the CARB 2022 Scoping Plan.

Connect SoCal 2024

The purpose of Connect SoCal 2024 is to achieve the regional per capita GHG reduction targets for the passenger vehicle and light-duty truck sector established by CARB pursuant to SB 375. SCAG's Program EIR for Connect SoCal 2024, certified on April 4, 2024, "requires MPOs to include a SCS element as part of their RTP updates, with the purpose of identifying policies and strategies to reduce per capita automobile and light-duty truck GHG emissions" (SCAG 2024b). Connect SoCal 2024 seeks future growth in PDAs to help the region reach mobility and environmental goals. Development in PDAs would provide people with access to multiple modes of transportation or where trip origins and destinations are closer together allowing for shorter trips (SCAG 2024b). Connect SoCal 2024 also seeks to protect Green Region Resource Areas (GRRAs), resource areas and farmland, which can reduce risks from climate change and promote future resilience (SCAG 2024b). Furthermore, Connect SoCal 2024 includes transportation improvements to be integrated and coordinated with land use patterns that support reduced congestion, reduced VMT, and increased transit, walking, and biking options. Connect SoCal 2024 shows that SCAG would meet the GHG emissions reduction target of 19 percent below 2005 levels by 2035.

TABLE 3.8-5
PROPOSED PROJECT CONSISTENCY WITH
2022 CLIMATE CHANGE SCOPING PLAN: APPENDIX D LOCAL ACTION

Priority Areas	Key Project Attribute	Consistency Analysis
Transportation Electrification	Provides EV charging infrastructure that, at minimum, meets the most ambitious voluntary standard in the California Green Building Standards Code at the time of project approval.	**Consistent.** Consistent with the 2022 California Green Building Standards Code, the Proposed Project would provide EV installed and capable parking spaces in accordance with the CALGreen Code and the Los Angeles County Code. Although the number of EV spaces may be modified in the future and the Applicant would comply with the current version of the CALGreen Code and Los Angeles County Code at the time of building permit issuance, the current version requires10% of residential parking spaces EV capable and 25% of EV Capable spaces would be equipped with Level 2 EV charging receptacles and 5% of EV capable spaces would be provided with EV chargers. The current version also requires EV capable spaces and EV capable spaces provided with EV charging stations for non-residential buildings based on the specific number of parking spaces provided for non-residential uses. Therefore, the Proposed Project would not conflict with this key project attribute.
VMT Reduction	Is located on infill sites that are surrounded by existing urban uses and reuses or redevelops previously undeveloped or underutilized land that is presently served by existing utilities and essential public services (e.g., transit, streets, water, sewer)	**No Conflict.** The Proposed Project would result in the development of affordable senior housing, affordable housing, market-rate faculty/staff housing, market-rate student housing, office, commercial and community uses, athletic facilities on an underutilized vacant site surrounded by CDU and nearby Martin Luther King Medical Center and existing residential community in close proximity to public transit options including Metro Local Bus Lines 53 and 55 and the Metro public transit (A Line [formally Blue Line] and C Line [formally Green Line] that intersect at the Willowbrook/Rosa Parks station, which are all located within 0.5 mile of the Proposed Project site. The Proposed Project is presently served by existing utilities and essential public services. Thus, the Proposed Project would not conflict with this key project attribute.
	Does not result in the loss or conversion of natural and working lands [a]	**No Conflict.** The Proposed Project proposes to redevelop an approximately 12.8-acre vacant site, which does not contain natural and working lands. The Proposed Project would not interfere, impede, or conflict with natural and working lands (NWL) strategies for all NWL actions under the 2022 Scoping Plan. Therefore, the Proposed Project would not conflict with this key project attribute.
	Consists of transit-supportive densities (minimum of 20 residential dwelling units per acre), or is in proximity to existing transit stops (within a half mile),or satisfies more detailed and stringent criteria specified in the region's SCS	**No Conflict.** The Proposed Project would result in an average density of approximately 43.7 dwelling units per acre (559 units on 12.8 acres). The Proposed Project is an infill development in an urbanized area and includes multi-family housing that would achieve the specified density and thus would be consistent with this key project attribute.

Priority Areas	Key Project Attribute	Consistency Analysis
	Reduces parking requirements by: Eliminating parking requirements or including maximum allowable parking ratios (i.e., the ratio of parking spaces to residential units or square feet); or providing residential parking supply at a ratio of less than one parking space per dwelling unit; or for multifamily residential development, requiring parking costs to be unbundled from costs to rent or own a residential unit.	**No Conflict.** LACC Section 22.18.060 requires automobile parking for a planned residential development in an amount adequate to prevent traffic congestion and excessive on-street parking; provided that in no event shall less than one covered parking space per dwelling unit be provided, or less than 50 percent of the required number of parking spaces for public assembly or recreational uses. The affordable housing components of the Proposed Project would have ground-level parking that includes 106 parking spaces, which represents 0.5 parking spaces per unit. For the senior affordable housing component of the Proposed Project, the ground-level parking includes 27 parking spaces, which represents 0.5 parking spaces per unit. Parking spaces for the faculty/staff housing component of the Proposed Project would be provided by the 637-space parking structure proposed along E. 117th Street. Parking would not be specifically provided for the market-rate student housing component of the Proposed Project. Thus, the Proposed Project would not conflict with this key project attribute.
	At least 20 percent of units included are affordable to lower-income residents,	**No Conflict.** The Proposed Project provides 254 affordable housing units (54 of which are senior affordable housing), which represents 45.4 percent of the Proposed Project's 559 residential units. Thus, the Proposed Project would not conflict with this key project attribute.
	Results in no net loss of existing affordable units	**No Conflict.** The Proposed Project would result in a net gain 254 affordable housing units (54 of which are senior affordable housing) which represents 45.4 percent of the Proposed Project's 559 residential units. Thus, the Proposed Project would not conflict with this key project attribute.
Building Decarbonization	Uses all-electric appliances without any natural gas connections and does not use propane or other fossil fuels for space heating, water heating, or indoor cooking.	**No Conflict.** As discussed in Chapter 2, Project Description of this Addendum to Final PEIR, the Proposed Project would include solar photovoltaic systems on the Project site in accordance with the current version of Title 24 at the time of building permit issuance. The provision of solar facilities would reduce the need and use of natural gas or propane. Thus, the Proposed Project would be partially consistent with this key project attribute.

NOTE:

a. California's natural and working lands (NWL) cover approximately 90 percent of the state's 105 million acres, and include forests, grasslands, shrublands and chaparral, croplands, wetlands, sparsely vegetated lands, and the green spaces in urban and built environments (p. 241 – 2022 Scoping Plan).

SOURCE: CARB, 2022a

In order to assess the Proposed Project's potential to conflict with Connect SoCal 2024, this section analyzes the Proposed Project's consistency with the strategies and policies set forth in Connect SoCal 2024 to meet GHG emission-reduction targets set by CARB. Generally, projects are considered to not conflict with applicable County and regional land use plans and regulations, such as SCAG's Connect SoCal 2024, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. The Proposed Project would not conflict with the Connect SoCal 2024 goals as detailed in **Table 3.8-6**, *Proposed Project Consistency with Applicable Connect SoCal 2024 Strategies*.

TABLE 3.8-6
PROPOSED PROJECT CONSISTENCY WITH APPLICABLE CONNECT SOCAL 2024 STRATEGIES

Strategies	Responsible Party(ies)	Compliance/Consistency Analysis
Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions.	Local Jurisdictions, SCAG	**No Conflict.** As discussed in Section 3.11, *Land Use and Planning*, of this Addendum to Final PEIR, the Proposed Project development would co-locate high-density residential uses, educational, employment, and commercial uses to enhance the mixed-use environment in which residents benefit from nearby shopping and employment opportunities and would be within walking distance of the Metro Willowbrook/Rosa Parks Station and local Metro bus lines 53 and 55. The features of the Proposed Project would not conflict with SCAG goals to increase transit-oriented development. Also as discussed in Chapter 2, Project Description of this Addendum to Final PEIR, the Project site would include Sustainable Features of: a solar photovoltaic (PV) system that would meet 70% electricity offset of the residential components of the Proposed Project as well as provide EV installed and capable parking spaces. As such, elements of the Proposed Project integrate the regions development pattern and transportation network in a way that reduces VMT, which improves air quality and reduces GHG emissions.
Ensure that reliable, accessible, affordable and appealing travel options are readily available, while striving to enhance equity in the offerings in high-need communities.	Local Jurisdictions, SCAG	**No Conflict.** The Proposed Project would not conflict with this strategy. As discussed in Chapter 2, Project Description, of this Addendum to Final PEIR, the Proposed Project would locate a variety of land uses including high-density residential uses, educational, employment, and commercial uses in close proximity to public transit options including Metro Local Bus Lines 53 and 55 and the Metro public transit (A Line [formally Blue Line] and C Line [formally Green Line] that intersect at the Willowbrook/Rosa Parks station, which are all located within 0.5 mile of the Proposed Project site.
Support planning for people of all ages, abilities, and backgrounds.	Local Jurisdictions, SCAG	**No Conflict.** The Proposed Project would not conflict with this strategy. As discussed in Section 3.11, *Land Use and Planning*, of this Addendum to Final PEIR, the Proposed Project includes affordable housing without displacing any existing residential units or commercial uses. As stated above, the Proposed Project development would co-locate high-density residential uses, educational, employment, and commercial uses to enhance the mixed-use environment in which residents benefit from nearby shopping and employment opportunities and would be within walking distance of the Metro Willowbrook/Rosa Parks Station and local Metro bus lines 53 and 55. Therefore, the Proposed Project supports planning for people of all ages, abilities, and backgrounds.
Create human-centered communities in urban, suburban and rural settings to increase mobility options and reduce travel distances.	Local Jurisdictions, SCAG	**No Conflict.** The Proposed Project would not conflict with this strategy. As discussed in Section 3.11, *Land Use and Planning*, of this Addendum to Final PEIR, the Proposed Project includes affordable housing, as well as senior affordable housing, without displacing any existing residential units or commercial uses. New student housing, athletic facilities, and other support services are proposed to be located adjacent to the existing CDU campus with direct pedestrian access and connectivity promoting a pedestrian-oriented campus that serves CDU students and staff, as well as the larger community by providing ground-floor commercial and retail uses integrated into the development. Additionally, a portion of E. 118th Street (approximately 700 linear feet) is proposed to be vacated (i.e., street vacation) and cars removed from the area between the existing campus and the Proposed Project. The vacated street will serve as a pedestrian promenade and provide a safe pedestrian experience between the existing campus and new development. In addition, the Proposed Project also includes various amenities that include transforming the Project site into a residential campus, thereby expanding the higher

Strategies	Responsible Party(ies)	Compliance/Consistency Analysis
		education experience for students without displacing access to other uses in the community. Furthermore, as stated above, the Proposed Project development would co-locate high-density residential uses, educational, employment, and commercial uses to enhance the mixed-use environment in which residents benefit from nearby shopping and employment opportunities and would be within walking distance of the Metro Willowbrook/Rosa Parks Station and local Metro bus lines 53 and 55. Therefore, the Proposed Project design emphasizes human-centered communities in urban settings to increase mobility options and reduce travel distances.
Produce and preserve diverse housing types in an effort to improve affordability, accessibility and opportunities for all households.	Local Jurisdictions, SCAG	**No Conflict.** The Proposed Project would not conflict with this strategy. As discussed in Section 3.11, *Land Use and Planning*, of this Addendum to Final PEIR, the Proposed Project includes much needed affordable housing, as well as senior affordable housing, without displacing any existing residential units or commercial uses. Furthermore, the Proposed Project also provides market-rate faculty/staff housing, market-rate student housing, office, commercial and community uses, student-oriented athletic facilities, and subterranean, ground level, and structured parking. The Proposed Project's residents would benefit from nearby shopping and employment opportunities and would be within walking distance of the Willowbrook/Rosa Parks Station and local Metro bus lines. Therefore, the Proposed Project produces diverse housing types in an effort to improve affordability, accessibility and opportunities for all households.
Develop communities that are resilient and can mitigate, adapt to, and respond to chronic and acute stresses and disruptions, such as climate change.	Local Jurisdictions, SCAG	**No Conflict.** The Proposed Project would not conflict with this strategy and would support these. As shown above in Table 3.8-2, the Proposed Project's total net annual GHG emissions would not exceed the Specific Plan Program's efficiency level of 3.0 $MTCO_2e$/SP for 2035, as shown in Table 3.5-2 and therefore, the Proposed Project would result in less than significant and less than cumulatively considerable effects associated with the generation of greenhouse gas emissions. Furthermore, as discussed in Chapter 2, Project Description of this Addendum to Final PEIR, the Proposed Project would include Sustainable Features of a solar photovoltaic (PV) system that would meet 70% electricity offset of the residential components of the Proposed Project as well as provide EV installed and capable parking spaces. Furthermore, the Proposed Project would be required to implement of Mitigation Measures AIR-2 through AIR-7 which would reduce potential GHG emissions (see Section 3.3, Air Quality, of this Addendum to Final PEIR for Additional Details). Mitigation Measures AIR-6 and AIR-7 reduce the amount of GHG's that would be generated and emitted through day-to-day operation of a project. These sustainable features and mitigation measures assist in developing resilient communities.
Integrate the region's development pattern and transportation network to improve air quality, reduce greenhouse gas emissions and enable more sustainable use of energy and water.	Local Jurisdictions, SCAG	**No Conflict.** The Proposed Project would not conflict with this strategy. As discussed in Section 3.11, *Land Use and Planning*, of this Addendum to Final PEIR, the Proposed Project development includes high-density residential uses, educational, employment, and commercial uses to enhance the mixed-use environment in which residents benefit from nearby shopping and employment opportunities and would be within walking distance of the Willowbrook/Rosa Parks Station. The features of the Proposed Project would not conflict with SCAG goals to increase transit-oriented development, which improves air quality and reduces GHG emissions from VMT. In addition, the Proposed Project would comply with Title 24 requirements and CALGreen to reduce energy consumption by implementing energy efficient building designs, pre-wiring residences with electric vehicle

Strategies	Responsible Party(ies)	Compliance/Consistency Analysis
		charging ports, and implementing solar-ready rooftops. Also as discussed in Chapter 2, Project Description of this Addendum to Final PEIR, the Proposed Project would include a solar photovoltaic (PV) system that would meet 70% electricity offset of the residential components of the Proposed Project, which were accounted for in the Proposed Project operational GHG emissions calculations. Furthermore, the Proposed Project would comply with Title 24 Energy Code that sets minimum water efficiency standards. Therefore, features of the Proposed Project promote more sustainable energy use, which improves air quality and reduces GHG emissions.
Conserve the region's resources.	Local Jurisdictions, SCAG	**No Conflict.** The Proposed Project would not interfere, impede, or conflict with SCAG and local jurisdiction strategies to conserve the region's resources. The Proposed Project would redevelop an approximately 12.8-acre vacant site, which does not contain the region's natural resources.
Improve access to jobs and educational resources.	Local Jurisdictions	**No Conflict.** The Proposed Project would not conflict with this strategy. As discussed in Section 3.11, *Land Use and Planning*, of this Addendum to Final PEIR, the Proposed Project includes much needed affordable housing without displacing any existing residential units or commercial uses. As stated above, the Proposed Project development would co-locate high-density residential uses, educational, employment, and commercial uses to enhance the mixed-use environment in which residents benefit from nearby shopping and employment opportunities and would be within walking distance of the Metro Willowbrook/Rosa Parks Station and local Metro bus lines 53 and 55. Therefore, the Proposed Project supports planning for people of all ages, abilities, and backgrounds. In addition, new student housing, athletic facilities, and other support services are proposed to be located adjacent to the existing CDU campus with direct pedestrian access and connectivity promoting a pedestrian-oriented campus that serves CDU students and staff, as well as the larger community by providing ground-floor commercial and retail uses integrated into the development
Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air and quality of life for our communities.	Local Jurisdictions	**No Conflict.** The Proposed Project would not interfere, impede, or conflict with local jurisdiction strategies to advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air and quality of life for our communities.

SOURCE: ESA 2024

Los Angeles County General Plan

As discussed previously, the County has identified goals and policies in the Los Angeles County General Plan Air Quality Element that address both air quality impact and GHG emissions reductions. **Table 3.8-7**, *Project Consistency with The Los Angeles County General Plan*, analyzes the Proposed Project's consistency with the policies in the County's General Plan. As discussed in Table 3.8-7, the Proposed Project would meet the Title 24 Building Energy Efficiency standards and CALGreen Code that are in effect at the time of building permit issuance. Furthermore, the Proposed Project would not conflict with the mobility goals of the General Plan. Specifically, the Proposed Project would not conflict with Goal M-4 and the

subsequent policies, as discussed in Table 4.8-8. Therefore, the Proposed Project would not conflict with the County's applicable policies for GHG emissions reduction.

TABLE 3.8-7
PROPOSED PROJECT CONSISTENCY WITH THE LOS ANGELES COUNTY GENERAL PLAN

Policies	Consistency
Goal AQ 3: Implementation of plans and programs to address the impacts of climate change. • Policy AQ 3.4: Participate in local, regional and state programs to reduce greenhouse gas emissions. • Policy AQ 3.5: Encourage energy conservation in new development and municipal operations. • Policy AQ 3.6: Support rooftop solar facilities on new and existing buildings.	**Consistent:** The Proposed Project would meet the Title 24 Building Energy Efficiency standards and CALGreen Code (Title 24, Parts 6 and 11). As discussed in Chapter 2, Project Description of this Addendum to Final PEIR, the Proposed Project would include Sustainable Features of a solar photovoltaic (PV) system that would meet 70% electricity offset of the residential components of the Proposed Project as well as provide EV installed and capable parking spaces.
Goal M 4: An efficient multimodal transportation system that serves the needs of all residents • Policy M 4.1: Expand transportation options that reduce automobile dependence. • Policy M 4.3: Maintain transit services within the unincorporated areas that are affordable, timely, cost-effective, and responsive to growth patterns and community input.	**Consistent:** The Proposed Project would encourage the use of alternative modes of transportation by co-locating the Proposed Project development. The Proposed Project development includes co-locating high-density residential uses, educational, employment, and commercial uses to enhance the mixed-use environment in which residents benefit from nearby shopping and employment opportunities and would be within walking distance of the Metro Willowbrook/Rosa Parks Station and local Metro bus lines 53 and 55. In addition, new student housing, athletic facilities, and other support services are proposed to be located adjacent to the existing CDU campus with direct pedestrian access and connectivity promoting a pedestrian-oriented campus that serves CDU students and staff, as well as the larger community by providing ground-floor commercial and retail uses integrated into the development. Additionally, a portion of E. 118th Street (approximately 700 linear feet) is proposed to be vacated and cars removed from the area between the existing campus and the Proposed Project. The vacated street will serve as a pedestrian promenade and provide a safe pedestrian experience between the existing campus and new development.

SOURCE: ESA, 2024

Los Angeles County Sustainability Plan

The Los Angeles Countywide Sustainability Plan (OurCounty Plan) is a regional sustainability plan for Los Angeles that outlines what local governments and stakeholders can do to enhance the well-being of every community in the County while reducing damage to the natural environment and adapting to the changing climate, particularly focusing on those communities that have been disproportionately burdened by environmental pollution (County of Los Angeles 2019). OurCounty includes a total of 12 sustainable goals. A consistency analysis with relevant sustainability goals is shown in **Table 3.8-8**, *Proposed Project Consistency with The OurCounty Plan*. As shown in Table 3.8-8, the Proposed Project would not conflict with the OurCounty Plan.

TABLE 3.8-8
PROPOSED PROJECT CONSISTENCY WITH THE OURCOUNTY PLAN

Policies	Consistency
Goal 2: Building and infrastructure that support human health hand resilience	**No Conflict.** The Proposed Project would comply with CALGreen and Title 24 requirements to reduce energy consumption by implementing energy efficient building designs, pre-wiring residences with electric vehicle charging ports, and implementing solar-ready rooftops. These measures are consistent with the County's Green Building Standards of improving energy efficiency in buildings.. Thus, the Proposed Project would not conflict with this goal.
Goal 3: Equitable and sustainable land use and development without displacement.	**No Conflict.** As discussed in Section 3.11, *Land Use and Planning*, of this Addendum to Final PEIR, the Proposed Project includes much needed affordable housing, as well as senior affordable housing, without displacing any existing residential units or commercial uses. New student housing, athletic facilities, and other support services are proposed to be located adjacent to the existing CDU campus with direct pedestrian access and connectivity promoting a pedestrian-oriented campus that serves CDU students and staff, as well as the larger community by providing ground-floor commercial and retail uses integrated into the development. Additionally, a portion of E. 118th Street (approximately 700 linear feet) is proposed to be vacated and cars removed from the area between the existing campus and the Proposed Project. The vacated street will serve as a pedestrian promenade and provide a safe pedestrian experience between the existing campus and new development. In addition, the Proposed Project also includes various amenities that include transforming the Project site into a residential campus, thereby expanding the higher education experience for students without displacing access to other uses in the community.
Goal 6: Accessible parks, beaches, recreational waters, public lands, and public spaces that create opportunities for respite, recreation, ecological discovery and cultural activities.	**No Conflict.** As stated above, the Proposed Project would vacate a portion of E. 118th Street (approximately 700 linear feet) so that cars can be removed from the area between the existing campus and the Proposed Project. The vacated street will serve as a pedestrian promenade and provide a safe pedestrian experience between the existing campus and new development. In addition, the Proposed Project also includes various amenities that include transforming the Project site into a residential campus, thereby expanding the higher education experience for students without displacing access to other uses in the community.
Goal 7: A fossil fuel-free LA County.	**No Conflict.** As discussed under Goal 2, the Proposed Project would comply with CALGreen and Title 24 requirements to reduce energy consumption by implementing energy efficient building designs, pre-wiring residences with electric vehicle charging ports, and implementing solar-ready rooftops Thus, the Proposed Project would not conflict with this goal.
Goal 8: A convenient, safe, clean, and affordable transportation system that enhances mobility while reducing car dependency.	**No Conflict.** As stated above, the Proposed Project development would co-locate high-density residential uses, educational, employment, and commercial uses to enhance the mixed-use environment in which residents benefit from nearby shopping and employment opportunities and would be within walking distance of the Metro Willowbrook/Rosa Parks Station and local Metro bus lines 53 and 55. Therefore, the Proposed Project supports planning for people of all ages, abilities, and backgrounds. Thus, the Proposed Project would not conflict with this goal.
Goal 9: Sustainable production and consumption of resources.	**No Conflict.** As stated above, the Proposed Project would comply with CALGreen and Title 24 requirements to reduce energy consumption by implementing energy efficient building designs, pre-wiring residences with electric vehicle charging ports, and implementing solar-ready rooftops. Also as discussed in Chapter 2, Project Description of this Addendum to Final PEIR, the Proposed Project would include a solar photovoltaic (PV) system that would meet 70% electricity offset of the residential components of the Proposed Project as well as provide EV installed and capable parking spaces. Thus, the Proposed Project would not conflict with this goal.

SOURCE: ESA, 2024

CALGreen Code and Los Angeles County Green Building Ordinance

The Proposed Project would not conflict with the requirements of the CALGreen Code and County Green Building Ordinance, which include building energy and water efficiency improvements. As discussed above, the Proposed Project would meet the Title 24 Building Energy Efficiency standards and CALGreen Code (Title 24, Parts 6 and 11). Although the number of EV spaces may be modified in the future and the Applicant would comply with the current version of the CALGreen Code and Los Angeles County Code at the time of building permit issuance, the current version requires 10% of residential parking spaces EV capable and 25% of EV Capable spaces would be equipped with Level 2 EV charging receptacles and 5% of EV capable spaces would be provided with EV chargers. The current version also requires EV capable spaces and EV capable spaces provided with EV charging stations for non-residential buildings based on the specific number of parking spaces provided for non-residential uses. As explained above, the Proposed Project would encourage the use of alternative modes of transportation through new and connected open spaces where new student housing, athletic facilities, and other support services are proposed to be located adjacent to the existing CDU campus with direct pedestrian access and connectivity promoting a pedestrian-oriented campus that serves CDU students and staff, as well as the larger community by providing ground-floor commercial and retail uses integrated into the development. Additionally, a portion of E. 118th Street (approximately 700 linear feet) is proposed to be vacated and cars removed from the area between the existing campus and the Proposed Project. The vacated street will serve as a pedestrian promenade and provide a safe pedestrian experience between the existing campus and new development.

As discussed above, the Proposed Project would not conflict with the 2022 Scoping Plan, SCAG Connect SoCal, the Los Angeles County General Plan, the OurCounty Plan and the CALGreen Code and Los Angeles County Green Building Ordinance. Thus, as the Proposed Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs, the Proposed Project's impact would be less than significant.

Cumulative

Cumulative development in vicinity of the Proposed Project could conflict with applicable GHG plans, policies or regulations. Therefore, cumulative development may not comply with the AQMP, resulting in a significant cumulative impact regarding consistency with the AQMP.

As discussed, the Proposed Project would not conflict with the 2022 Scoping Plan, SCAG Connect SoCal, the Los Angeles County General Plan, the OurCounty Plan and the CALGreen Code and Los Angeles County Green Building Ordinance. Therefore, because the Proposed Project would not conflict with applicable GHG plans, policies or regulations, the Proposed Project's contribution to potential cumulative impacts regarding conflict with applicable GHG plans, policies or regulations would be less than cumulatively considerable.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project would not conflict with any applicable plan, policy or regulation for the purpose of reducing the emissions of GHGs, and impacts would be less than significant. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

3.8.7 References

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3.9 Hazards and Hazardous Materials

3.9.1 Introduction

This section addresses hazards and hazardous materials and the potential of the Proposed Project to cause hazards and hazardous materials impacts onsite and to surrounding uses. This section includes a brief summary of the environmental setting included in the Final PEIR, and the identification of any applicable changes to the hazard and hazardous materials settings that may have occurred since the certification of the Final PEIR. In addition, a brief summary of the regulatory setting included in the Final PEIR and any substantive revisions to the regulatory setting that has occurred since the certification of the Final PEIR. This section also includes the thresholds of significance and a brief summary of the hazards and hazardous materials impacts and mitigation measures addressed in the Final PEIR as well as the potential hazards and hazardous materials impacts associated with the Proposed Project. Finally, this section provides a conclusion of whether (1) the Proposed Project includes substantial changes that would require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact related to hazards and hazardous materials; (2) substantial changes in the circumstances under which the Proposed Project is undertaken would require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact related to hazards and hazardous materials; or (3) new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3) exist related to hazards and hazardous materials.

This section is largely based on information and findings gathered as part of the *Phase I Environmental Site Assessment, Lincoln Elementary School Property, Willowbrook, CA* (herein, referred to as the Phase I ESA), prepared by Geocon Consultants, Inc.., dated June 14, 2019 and the *Phase II Subsurface Investigation Report, Wellness Campus/Willowbrook Joint Development Project,* prepared by Citadel EHS (see **Appendix F** of this Addendum to Final PEIR)**.**

3.9.2 Environmental Setting

Existing Land Use

As identified in the Final PEIR, the Specific Plan Program area is developed, urban and includes a variety of land uses, the majority of which are residential, retail, office, educational, institutional facilities, and service facilities. There is one location within the Specific Plan Program area that includes an industrial use which is at the southwest corner of Monda Boulevard and I-105, approximately 0.6-mile from the eastern portion of the Project site. Some of the key non-residential land uses that are located within the Specific Plan Program area include: Martin Luther King, Jr. (MLK) Medical Center, CDU, Kenneth Hahn Plaza, Willowbrook Library, and MLK Center for Public Health. Each of these uses are located south or east of the Project site.

The Proposed Project is located on two properties: the first is owned by the Compton USD and is located south of E. 117th Street, and the second is owned by the Los Angeles County Development Authority (LACDA) and located north of E. 117th Street.

The Compton USD property included two abandoned school sites, formerly known as Lincoln Elementary School and Barack Obama Charter School. The Barack Obama Charter School included buildings in the northeastern portion of the property. The school was relocated to San Pedro Street in Los Angeles in 2017. The school buildings were removed in 2020; however, this area still has a surface parking lot, asphalt play yard, and open unimproved space. The Lincoln Elementary School included buildings on the southern portion of the Compton USD property. The school was relocated to the City of Compton in 2017. The abandoned school site included 10 single story buildings and multiple modular buildings. The school buildings were removed in 2023; however, this area still contains building foundations, surface parking lot, asphalt paving between the remaining building foundations, and an asphalt school play yard.

The LACDA's property is currently vacant and contains non-native grasses. Along the northern boundary of the property, adjacent to the I-105 right-of-way, there are homeless encampments.

The topography of the Project site is relatively flat with a slight slope to the south-southeast. According to the United States Geological Survey (USGS), the Project site elevation is approximately 92 feet above mean sea level.

The Project site is underlain by Quaternary alluvium and alluvial fan deposits which are generally unconsolidated, while soils on the Project site consist of Urban-land Hueneme of the San Emigdio complex. These geologic materials and soils are generally permeable and well drained, with very low runoff. Furthermore, the Phase I ESA reported the depth to groundwater within monitoring wells located within the Project site vicinity ranged between 40 to 46 feet.

Environmental Records Review

The Final PEIR identified that past and current land uses can be important indicators of whether hazardous materials were likely used at a site and whether they may be present in the subsurface soil and groundwater. Portions of the Specific Plan Program area were historically used for agricultural purposes. Development in the area began in the late 1800s with a variety of public, commercial, and residential uses that may have included the generation, use, storage, or disposal of hazardous materials. These past and current operations in the Specific Plan Program area that may involve hazardous materials include: schools and university, hospital; pest control; and agriculture. Constituents of environmental concern common to these uses include biological waste, petroleum hydrocarbons, volatile organic compounds (VOCs), PCBs, asbestos, lead, and pesticides.

The Final PEIR included the results of an environmental database search that identified two sites within the Specific Plan Program area that are on regulatory agency lists of known or possible soil or groundwater contamination sites (see Appendix D). These sites include the following: one leaking underground storage tank (LUST) and one active cleanup site. The LUST is located at the MLK Community Hospital and the case was closed in 1996. The active cleanup site is

located at the Kenneth Hahn Plaza and included the release of Tetrachloroethene (PCE) in the soil and groundwater.

In addition to the environmental concerns identified above, there were three additional sites of environmental concern that are located adjacent to the Specific Plan Program area. One identified as Hooper Texaco Service Station located approximately 2,200 feet south of the Project site and at northwest corner of Compton Avenue and 120th Street. The second was a former Mobile service station located approximately 0.2-mile northeast of the Project site. The third is a site that was historically used as a gas station and currently includes the Willow Apartments. It is located 0.26-mile south of the Specific Plan Program area and 0.6-mile southeast of the Project site. All three sites are listed on the Cortese List.

For the Hooper Texaco Service Station site, these databases describe a release of gasoline that was discovered following the installation of three groundwater monitoring wells at the facility. Laboratory analysis results from the groundwater monitoring events indicated that the petroleum release was limited to shallow groundwater and the reported flow direction was to the south-southeast (away from the Project site). On August 16, 2021, the Los Angeles Regional Water Quality Control Board (LARWQCB) issued a case closure letter indicating that the extent of soil and groundwater contamination was sufficiently remediated, and no further action was required.

For the former Mobile Service Station site, these databases reference a release of gasoline that was discovered following the removal of five USTs at the facility in 1990. Since then, several subsurface investigations have been conducted at the facility since then, including soil and groundwater sampling, as well as the installation of sixteen groundwater monitoring wells and an SVE pilot test. On February 12, 2012, the LARWQCB issued a case closure letter stating that the extent of soil and groundwater contamination had been adequately defined, that vapor intrusion was not a concern, and that residual contamination was unlikely to have caused a significant human health and/or environmental risk. The Phase I ESA concluded that the property would not be considered a Recognized Environmental Condition (REC) to the Project site. The term REC is used to describe the presence of hazardous substances on a property.

The Willow Apartments are located at 12612 South Wilmington Street and is a LUST Cleanup Site. This site maintains an Open-Remediation status. The potential contaminants of concern are petroleum/fuels/oils. The site was historically used as a gas station. Four underground storage tanks were removed, and soil vapor extraction was implemented. The Regional Board letter dated October 24, 2005, issued a soil-only closure which identifies that the site's soils were remediated, and no significant hazardous threat remains associated with soil contamination. Gasoline-related contaminants are present in groundwater beneath the site at elevated concentrations. The lateral and vertical extent of the groundwater contamination has not been determined.

Since the certification of the Final PEIR, a Phase II Subsurface Investigation Report was prepared for the CDU Health Profession Education Building located approximately 300 feet south of the Project site and along E. 120th Street. The investigation identified one soil sample on the Health Profession Education Building site with lead concentrations greater than the SCAQMD threshold and identified methane concentrations but less than an action level. However, during grading

operations, a Soil Management Plan was implemented to protect worker health and safety during construction.

Soil and Soil Vapor Conditions

In addition to the Phase I ESA prepared for the Proposed Project, a Phase II Subsurface Investigation Report was prepared for the Proposed Project to assess the potential presence of VOCs, TPH, PCBs, Title 22 Heavy Metals, including lead, and organochlorinated pesticides, in the soil beneath the Project site. The subsurface investigation collected twenty-five soil borings across the Project site to depths up to 15 feet below ground surface (bgs). Two near surface soil samples were collected near surface mounted transformers. Methane field data, soil vapor and soil samples were collected from the borings. Soil vapor samples collected at five and 15 feet bgs from each boring were analyzed for volatile organic compounds (VOCs). Soil samples collected at five feet bgs from each boring were analyzed for VOCs, total petroleum hydrocarbons (TPH), Title 22 metals and organochlorine pesticides (OCPs). The shallow soil samples collected near the transformers were analyzed for polychlorinated biphenyls (PCBs).

Laboratory results from the Phase II were compared to California State Environmental Protection Agency (CalEPA) environmental screening levels (ESLs) that are published by the San Francisco Bay Regional Water Quality Control Board and screening levels (SLs) that are published by the Department of Toxic Substances Control. ESLs and SLs are used as a basis for determining if further action is required for a site. Further action, if required, may include the preparation of a human health risk assessment, additional surface data collection, remediation, indoor air testing, the implementation of mitigation measures, or a combination of these actions. ESLs and SLs are not regulatory limits, hazardous waste thresholds or remediation cleanup goals.

Because the proposed Project includes residential occupancy, the residential ESL and SL for tetrachloroethene (PCE) in soil vapor of 15 microgram per cubic meter ($\mu g/m^3$) is referenced to determine if further action for the Project site is required. The residential ESL and SL of 15 $\mu g/m^3$ is based on a regulatory health threshold concentration for residential indoor air of 0.46 $\mu g/m^3$. To derive the soil vapor residential ESL and SL of 15 $\mu g/m^3$, a conservative screening attenuation factor (AF) of 0.03 was used. The conservative screening AF refers to the decrease in VOC concentration that occurs through the process of vapor migration into the indoor air space of a building, coupled by dilution of the indoor air concentrations of vapor when mixed completely with indoor air. An AF of 0.03 assumes that 3 percent of VOC concentrations in subsurface vapor will accumulate in the building interior through the combination of migration and dilution, and thus defines the conservative theoretical threshold concentration limit of subsurface soil vapor that may pose an indoor air health risk. A conservative AF is used in the absence of a Site-specific AF. However, it is anticipated that newly constructed residential buildings will have an AF of approximately 0.001 based on information provided within DTSC's Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air, thereby allowing for a higher concentration of PCE in the subsurface vapor before exceeding indoor air residential screening levels. Based on an AF of 0.001, the PCE vapor concentrations in the subsurface would need to be approximately 460 $\mu g/m^3$ prior to exceeding the indoor air residential screening level of 0.46 $\mu g/m^3$. **Table 3.9-1,** *Borings Exceeding Soil Vapor Concentration Limits*, shows the boring samples that exceeded the residential ESL and SL for soil vapor (VOCs).

TABLE 3.9-1
BORINGS EXCEEDING SOIL VAPOR CONCENTRATION LIMITS

Boring ID[a]	Sample Depth (feet below ground surface)	Screening Concentration Threshold Limit (µg/m³)[b]	Constituent Level (µg/m³)
B2-5V	5	15	48
B11-5V	5	15	39
B15-15V	15	15	15
B16-5V	5	15	32
B16-15V	15	15	19
B18-15V	15	15	17
B20-5V	5	15	26
B20-15V	15	15	23

NOTES:

VOC – Volatile Organic Compound

µg/m³ – micrograms per cubic meter

a. Boring locations are illustrated in Figure 2 in the *Phase II Subsurface Investigation Report, Wellness Campus/Willowbrook Joint Development Project,* prepared by Citadel EHS (see Appendix F of this Addendum to Final PEIR)

b. Environmental Screening Level

SOURCE: Citadel EHS, 2024

A summary of soil vapor results showed the following.

- Tetrachloroethene (PCE) was reported in soil vapor samples from 23 borings primarily in the middle of the Project site at concentrations ranging between 1.1 µg/m³ and 48 µg/m³.
- Reported concentrations of PCE in eight samples from six of the borings range between 15 µg/m³ and 48 µg/m³, equal to or above the residential ESL and SL of 15 µg/m³. Concentrations of PCE in three of these borings are reported to be higher in the shallow (5-foot) samples than the deep (15-foot) samples.
- Due to the low concentrations (maximum of 48 µg/m³)and limited areal extent of PCE, and due to an expected lower AF (i.e., 0.001) for newly constructed buildings that would require PCE vapor concentrations in the subsurface to be approximately 460 µg/m³ prior to exceeding the indoor air residential screening level of 0.46 µg/m³, a vapor intrusion risk to future building occupants is de minimis. Furthermore, grading and excavation will result in the dissipation of VOCs that may be present in the subsurface pore space as soil vapor, and the volatilization of VOCs that may be present in soil. Based on these conditions, soil vapor mitigation or remediation measures are not required. No source of PCE in soil vapor was identified during the investigation, therefore, no remediation is required.

A summary of soil results showed the following.

- TPH as diesel (TPHd) and oil (TPHo) were reported in 19 soil sample samples primarily from the southern portion of the Project site, at concentrations that are below respective residential ESLs and SLs.
- Lead was reported in 23 soil samples primarily in the central portion of the Project site, at concentrations below the residential ESL and SL.

- Dieldrin, an OCP, was reported in one soil sample at a concentration below the residential ESL and SL.
- Acetone, a VOC, was reported in one soil sample at a concentration below the residential ESL and SL.
- Based on the presence of TPH, dieldrin and acetone at concentrations that are below respective residential ESLs, soil mitigation or remediation measures are not required.
- PCE was not reported in any of the soil samples.
- The reported concentrations of TPH, VOCs (including PCE), heavy metals, OCPs and PCBs were not detected above the laboratory method detection limit or were below the respective residential ESLs and SLs, and therefore soil remediation is not required.

In addition to evaluating the Title 22 soil samples in relation to the residential ESLs and SLs, these samples were also evaluated in accordance with Soluble Threshold Limit Concentration (STLC) levels. One Title 22 soil sample (lead) exceeded the STLC threshold, but did not exceed the ESL or SL thresholds. The purpose of evaluating each metal in accordance with the STLC limits is to determine the appropriate disposal location, if exported offsite. An exceedance of an STLC is not to determine a health hazard level, but to determine the appropriate disposal location. The health hazard is evaluated by comparing the samples to ESLs and SLs. As described above, the ESLs and SLs for the Title 22 metals within each of the onsite soil samples were not exceeded.

In summary, no conditions requiring mitigation or remediation of soil or soil vapor were identified during the Phase II. Development activities planned for the Site will include the disturbance and removal of soil. Although a potential source for PCE was not identified, concentrations of TPH and other VOCs in soil are below respective screening levels, and no remediation or mitigation measures are required, a potential exists to discover these constituents during Project site development activities. As a typical construction practice for sites where the potential exists to discover these constituents even though the concentrations found within the soil borings are below respective screening levels, a Soil Management Plan (SMP) would be implemented for use during soil disturbing activities. The SMP describes specific soil-handling procedures required to comply with South Coast Air Quality Management District (SCAQMD) regulations, prevent unacceptable human exposure to contaminated soil and soil vapor, and prevent the improper use, re-use or disposal of potentially contaminated soils that may be encountered. Any contaminants discovered during development of the Project site will be handled, managed and disposed of according to the procedures described in the SMP, and all regulatory requirements[3]. Following the conclusion of development activities, a close-out report will be prepared. The report will document soil disturbance activities during development of the Project site and the discovery of contaminated material, if found. The report will provide a summary of findings and recommendations, if needed.

Potential Hazardous Materials in Structural and Building Components

Hazardous materials, such as asbestos, lead, and PCBs, may also be contained in building materials and components that pre-date the 1970s USEPA ban on the inclusion of these hazardous materials in structural and building components. Based on the results of the site reconnaissance

and the age of the existing structures on the Project site, asbestos containing materials (ACMs), lead based paint (LBP), and PCBs may be present.

Proximity to Sensitive Land Uses

According to the California Air Resources Board (CARB), sensitive receptors are children, elderly, asthmatics, and others who are at a heightened risk of negative health outcomes due to exposure to air pollution. The locations where these sensitive receptors congregate are considered sensitive receptor locations. Sensitive receptor locations may include hospitals, schools, and day care centers, and such other locations as the air district board or California Air Resources Board may determine (California Health and Safety Code § 42705.5(a)(5)).

The Project would be an expansion of the existing CDU campus located adjacent to the Project site to the south. In addition, King Drew Magnet High School is located at the intersection of East 120th Street and Compton Avenue approximately 350 feet south of the Project site. Furthermore, the Martin Luther King Jr. Medical campus, which includes a hospital, is located approximately 550 feet south of the Project site at the intersection of Healthy Way and East 120th Street.

Proximity to Airports

There are no airports or airstrips within two miles of the Project site. The nearest airport to the Project site is the Compton/Woodley Airport located approximately 2.43 miles south of the site. Hawthorne Municipal Airport is located approximately 4.62 miles west of the Project site.

Emergency and Disaster Routes

Disaster routes are freeway, highway or arterial routes pre-identified for use during times of crisis (County of Los Angeles, 2022). These routes are utilized to bring in emergency personnel, equipment, and supplies to impacted areas in order to save lives, protect property and minimize impact to the environment. During a disaster, these routes have priority for clearing, repairing and restoration over all other roads. Note that disaster routes are not evacuation routes. Although an emergency may warrant a road be used as both a disaster and evacuation route, these routes are different. An evacuation route is used to move the affected population out of an impacted area.

The Project site is located in an established urban area that is well served by the surrounding roadway network, and multiple routes exist in the area for emergency vehicles and evacuation. The Project site is bounded by Compton Avenue (two lanes) to the west, East 118th Street (one lane) to the south, and the I-105 (five lanes) to the north. Wilmington Avenue (four lanes) located to the east of the Project site also supports transportation for the roadway network surrounding the Project site.

Alameda Street, located approximately 1 mile east of the Project site and Imperial Highway, located north of the Project site, across the I-105, are both designated as Secondary Disaster Routes by the Los Angeles County Department of Public Works (LADPW). I-105, located adjacent to the Project site to the north, is designated as a Primary Disaster Route by LADPW (County of Los Angeles, 2022).

3.9.3 Regulatory Setting

Federal, state, and local regulations govern the range of hazardous materials issues that may be encountered during demolition, construction, and ongoing operation in the project area. Various state and local regulatory agencies implement these regulations to minimize the risk to human health and the environment from hazardous materials. In addition, the policies of the County's General Plan related to hazards and hazardous materials are also listed.

Federal

Polychlorinated Biphenyls

In 1979, the USEPA banned the use of PCBs in most new electrical equipment and began a program to phase out certain existing PCB-containing equipment. The use and management of PCBs in electrical equipment is regulated pursuant to the Toxic Substances Control Act (TSCA), 15 USC Section 2601 et seq. The TSCA and its implementing regulations generally require labeling and periodic inspection of certain types of PCB equipment and set forth detailed safeguards to be followed for disposal of such items.

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) was passed by Congress in 1976 as the primary law governing the disposal of solid and hazardous waste. RCRA set national goals for: protecting human health and the environment from the potential hazards of waste disposal; conserving energy and natural resources; reducing the amount of waste generated; and ensuring that wastes are managed in an environmentally-sound manner. There are three programs under RCRA to assist in achieving the goals listed above:

- The solid waste program encourages states to develop comprehensive plans to manage non-hazardous industrial solid waste and municipal solid waste landfills and other solid waste disposal facilities and prohibits the open dumping of solid waste.
- The hazardous waste program establishes a system for controlling hazardous waste from the time it is generated until its ultimate disposal — in effect, from "cradle to grave."
- The UST program regulates USTs containing hazardous substances and petroleum products.

RCRA banned all open dumping of waste, encouraged source reduction and recycling, and promoted safe disposal of municipal waste. RCRA also mandated strict controls over the treatment, storage, and disposal of hazardous waste.

Toxic Substances Control Act

The Toxic Substances Control Act (TSCA) of 1976 provides EPA with authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures. TSCA addresses the production, importation, use and disposal of specific chemicals including PCBs, asbestos, radon and lead-based paint.

U.S. Department of Transportation. Hazardous Materials Transport Act (49 USC 5101)

The U.S. Department of Transportation, in conjunction with the USEPA, is responsible for enforcement and implementation of federal laws and regulations pertaining to transportation of hazardous materials. The Hazardous Materials Transportation Act of 1974 directs the U.S. Department of Transportation to establish criteria and regulations regarding the safe storage and transportation of hazardous materials. Code of Federal Regulations (CFR) 49, 171–180, regulates the transportation of hazardous materials, types of material defined as hazardous, and the marking of vehicles transporting hazardous materials.

State

Health and Safety Code, Section 25249.5 et seq. Safe Drinking Water and Toxics Enforcement Act, Proposition 65

This law identifies chemicals that cause cancer and reproductive toxicity, provides information for the public, and prevents discharge of the chemicals into sources of drinking water. Lists of the chemicals of concern are published and updated periodically. Businesses are required to notify Californians about the chemicals in products they purchase, in the workplace, or that are released to the environment. By providing this information, individuals are able to make informed decisions about protecting themselves from exposure to these chemicals.

Hazardous Materials and Waste Handling

Excavated soil containing hazardous substances and hazardous building materials would be classified as a hazardous waste if they exhibit the characteristics of ignitability, corrosivity, reactivity, or toxicity (CCR, Title 22, Division 4.5, Chapter 11, Article 3). State and federal laws require detailed planning to ensure that hazardous materials are properly handled, used, stored, and disposed of, and in the event that such materials are accidentally released, to prevent or to mitigate injury to health or the environment. These laws and regulations are overseen by a variety of state and local agencies. The California Integrated Waste Management Board and the RWQCB specifically address management of hazardous materials and waste handling in their adopted regulations (CCR, Title 14 and CCR, Title 27).

In the Specific Plan Program area, including the Project site, LACDPW Environmental Programs Division is responsible for implementing the UST Program, and the Los Angeles County Fire Department Health Hazardous Materials Division (LACFD-HHMD) is the Certified Unified Program Agency (CUPA) responsible for implementing the program elements shown below.

- Hazardous Waste Generator and Onsite Hazardous Waste Treatment Programs (Tiered Permitting);
- Aboveground Petroleum Storage Tank Spill Prevention Control and Countermeasure Plan (SPCC);
- Hazardous Materials Release Response Plans and Inventory Program (Hazardous Materials Disclosure or “Community-Right-to Know”);
- California Accidental Release Prevention Program (Cal ARP); and

- Uniform Fire Code Plans and Inventory Requirements.

The laws and regulations that established these programs require that businesses that use or store certain quantities of hazardous materials submit a Hazardous Materials Business Plan (HMBP) that describes the hazardous materials usage, storage, and disposal to the local oversight agency (CUPA). Aboveground and underground storage tanks must be properly permitted. The County may perform inspections and issue citations to businesses not in compliance with these regulations.

Worker Safety

Occupational safety standards exist in federal and state laws to minimize worker safety risks from both physical and chemical hazards in the workplace. The California Division of Occupational Safety and Health (Cal/OSHA) and the federal Occupational Safety and Health Administration (OSHA) are the agencies responsible for assuring worker safety in the workplace.

Cal/OSHA assumes primary responsibility for developing and enforcing standards for safe workplaces and work practices. At sites known or possibly to be contaminated, a Site Safety Plan must be prepared. The Site Safety Plan establishes policies and procedures to protect workers and the public from exposure to potential hazards at a contaminated site.

Emergency Response

California has developed an emergency response plan to coordinate emergency services provided by federal, state and local government, and private agencies. Responding to hazardous materials incidents is one part of this plan. The plan is administered by the State Office of Emergency Services (OES), which coordinates the responses of other agencies, including the California Environmental Protection Agency (Cal/EPA), California Highway Patrol (CHP), the California Department of Fish and Wildlife, the RWQCB, and the local fire department. The Los Angeles County Fire Department provides first response capabilities, if needed, for hazardous materials emergencies for the Project site.

Utility Notification Requirements

Title 8, Section 1541 of the CCR requires excavators to determine the approximate locations of subsurface installations such as sewer, telephone, fuel, electric, and water lines (or any other subsurface installations that may reasonably be encountered during excavation work) prior to opening an excavation. The California Government Code (Section 4216 et seq.) requires owners and operators of underground utilities to become members of and participate in a regional notification center. According to Section 4216.1, operators of subsurface installations who are members of, participate in, and share in the costs of a regional notification center are in compliance with this section of the code. Underground Services Alert of Southern California (known as DigAlert) receives planned excavation reports from public and private excavators and transmits those reports to all participating members of DigAlert that may have underground facilities at the location of excavation. Members will mark or stake their facilities, provide information, or give clearance to dig.

Regional

South Coast Air Quality Management Agency Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil

This Rule requires that an approved mitigation plan be obtained from SCAQMD prior to commencing any of the following activities: (1) the excavation of an underground storage tank or piping which has stored volatile organic compounds (VOCs), (2) the excavation or grading of soil containing VOC material including gasoline, diesel, crude oil, lubricant, waste oil, adhesive, paint, stain, solvent, resin, monomer, and/or any other material containing VOCs, (3) the handling or storage of VOC-contaminated soil (soil which registers greater than 50 parts ppm or greater using an organic vapor analyzer calibrated with hexane) at or from an excavation or grading site, and (4) the treatment of VOC-contaminated soil at a facility.

Local

Following are the relevant policies from the Los Angeles County General Plan (County of Los Angeles, 2015).

General Plan—Land Use Element

Policy LU 2.9: Utilize the General Plan Land Use Legend and the Hazard, Environmental and Resource Constraints Model to inform the development of land use policy maps.

Policy LU 4.1: Encourage infill development in urban and suburban areas on vacant, underutilized, and/or brownfield sites.

General Plan—Safety Element

Policy S 4.1: Ensure that residents are protected from the public health consequences of natural or manmade disasters through increased readiness and response capabilities, risk communication, and the dissemination of public information.

Policy S 4.2: Support County emergency providers in reaching their response time goals.

Policy S 4.3: Coordinate with other County and public agencies, such as transportation agencies, and health care providers on emergency planning and response activities, and evacuation planning.

Policy S 4.5: Ensure that there are adequate resources, such as sheriff and fire services, for emergency response.

3.9.4 Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines and the County of Los Angeles Environmental Checklist Form, the project could have a significant impact related to hazards and hazardous materials if it would:

- Create a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials (See Impact 3.9-1, below).

- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment (See Impact 3.9-2, below).
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of sensitive land uses (See Impact 3.9-3, below).
- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment (See Impact 3.9-4, below).
- For a project located within an airport land use plan or, where such a plan has not yet been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area (See Impact 3.9-5, below).
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan (See Impact 3.9-6, below).
- Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving fires, because the project is located:
  - within a high fire hazard area with inadequate access
  - within an area with inadequate water and pressure to meet fire flow standards
  - within proximity to land uses that have the potential for dangerous fire hazard (See Impact 3.9-7, below).
- Constitute a potentially dangerous fire hazard (See Impact 3.9-8).

3.9.5 Impact Analysis

Routine Transport, Storage, Production, Use, or Disposal

Impact 3.9-1: The Specific Plan Program and Proposed Project would result in a less than significant and less than cumulatively considerable impact to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Initial Study/Notice of Preparation and Final PEIR identified that that the Specific Plan Program would not create a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials. Construction of new development within the Specific Plan Program area would involve the routine use, handling, storage, transport, and disposal of hazardous materials such as fuels, paints, and solvents. However, construction activities would comply with applicable federal, state, and local regulations, and the amounts of these materials would be limited as to not pose a significant hazard to workers or the environment. Furthermore, construction contractors would be required to implement standard best management practices (BMPs) regarding hazardous materials storage, handling, and disposal during construction, thus ensuring construction impacts would be less than significant.

Operations of the new development within the Specific Plan Program area would provide for increased intensity of uses. Hazardous materials associated with residential and commercial uses may include solvents, cleaning agents, paints, pesticides, batteries, and aerosol cans. The medical facilities and hospital within the Specific Plan Program area would be a small- and large quantity generator of hazardous materials such as oxygenated solvents and other medical waste. All hazardous materials used for operations would comply with existing regulations and uses would remain similar to operations that existed prior to Specific Plan Program implementation. Therefore, operational impacts would be less than significant.

Cumulative

The Final PEIR did not address the cumulative impact on the routine transport, storage, production, use, or disposal of hazardous materials since the uses within the Specific Plan Program would comply with existing regulations. This compliance would result in less than significant hazardous materials impacts, and these impacts would be less than cumulatively considerable.

Proposed Project Evaluation

Proposed Project-Specific

Construction

The hazardous materials used for construction will be typical of most construction projects of this type. Materials will include small quantities of gasoline, diesel fuel, oils, lubricants, solvents, detergents, degreasers, paints, ethylene glycol, dust palliatives, herbicides, and welding materials/supplies.

The California Hazardous Materials Release Response Plans and Inventory Law of 1985 (Business Plan Act) requires preparation of hazardous materials business plans (HMBP) and disclosure of hazardous materials inventories, including an inventory of hazardous materials handled, plans showing where hazardous materials are stored, an emergency response plan, and provisions for employee training in safety and emergency response procedures (California Health and Safety Code, Division 20, Chapter 6.95, Article 1). The LACFD is the local Certified Unified Program Agency (CUPA) with jurisdiction over the project's hazardous materials. The HMBP would be provided to the County and would include necessary information to prevent or mitigate possible environmental contamination or worker exposure. During project construction, material safety data sheets for all applicable materials present at the site are required to be made readily available to on-site personnel.

Construction contractors would implement BMPs for handling hazardous materials during construction activities, including following manufacturers' recommendations and regulatory requirements for use, storage, and disposal of chemical products and hazardous materials used in construction; avoiding overtopping construction equipment fuel tanks; routine maintenance of construction equipment; and properly disposing of discarded containers of fuels and other chemicals. Construction contractors are required to implement safety measures in accordance with the General Industry Safety Orders of the California Code of Regulations. Furthermore, all construction-related materials would be transported and disposed of in accordance with applicable codes and regulations.

Hazardous Building Materials

The identification, removal, and disposal of PCBs is regulated under RCRA (4 CFR 7610, TSCA (15 USC 2695) and California regulations (CCR Title 22, Division 4.5, Chapter 11, Article 3,

Section 66261.24). Electrical transformers and older fluorescent light ballasts not previously tested and verified to not contain PCBs must be tested. If PCBs are detected above action levels, the materials must be transported and disposed of at a licensed facility permitted to accept the materials in compliance with these applicable local, state, and federal laws and regulations.

Residual Chemicals in Soil and Soil Gas

Development activities planned for the Project site will include the disturbance and removal of soil. As identified above, the potential to discover soil and vapor contaminants is low. As with the Specific Plan Program, if any unidentified sources of contamination are encountered during grading or excavation activities, identification and removal work will be required according to federal, state, and local standards. As a typical construction practice for sites where the potential exists to discover these constituents even though the concentrations found within the soil borings are below respective screening levels, an SMP would be implemented for use during soil disturbing activities. The purpose of the SMP is to describe specific soil-handling procedures required to comply with South Coast Air Quality Management District regulations, prevent unacceptable human exposure to contaminated soil and impacted soil vapor, and prevent the improper use, re-use or disposal of potentially contaminated soils. As with the Specific Plan Program, adherence to the regulatory requirements will reduce potential impacts related to unknown contaminated sites to less than significant.

Operation

Following construction, the Project site would have been cleared of contaminated soils in compliance with federal, state, and local. regulations. No long-term issue would be associated with the soil contamination in the vicinity of the Project site. Once constructed, the Project would use and store small quantities of chemicals typical in residences, such as household cleaning solutions, paints and thinners, and motor fuel (e.g., vehicles and lawn mowers). Few of the chemicals would be considered hazardous materials (e.g., bleach) and the anticipated volumes would be small (i.e., less than 5 gallons). The maintenance of the open space landscaping would use and store small quantities of chemicals typical in landscaping maintenance, such as pesticides, herbicides, and motor fuel (e.g., vehicles and lawn mowers). Note that modern pesticides and herbicides are designed to be less toxic and degrade to inert compounds. Given that the quantities would be small, the routine use or an accidental spill of hazardous materials would ensure impacts remain less than significant.

Cumulative

Future cumulative uses in the Project vicinity, such as commercial operations, may use, transport, or dispose of hazardous materials or wastes. However, while future surrounding development may increase hazardous materials use in the Project vicinity, all hazardous materials used for operations would be required to comply with existing regulations. This compliance would reduce the potential impact from cumulative development to less than significant. Because the Proposed Project would also need to comply with existing hazardous materials regulations, the Project's impact related to the transport, storage, production, use or disposal of hazardous materials or waste would be less than cumulatively considerable.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project would have a less than significant impact related to routine transport, storage, production, use, or disposal of hazardous materials. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in the severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Accident Conditions

Impact 3.9-2: The Specific Plan Program and Proposed Project would result in a less than significant and less than cumulatively considerable impact to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

As discussed in the Final PEIR, construction activities related to implementation of the Specific Plan Program could expose the public or environment to hazardous substances in the event of an accidental release. Development activities that occur within Specific Plan Program area would be required to adhere to all applicable regulations regarding hazardous materials storage and handling, as well as to implement construction best management practices (BMPs) to prevent such a release and to promptly contain and clean up any spills. Therefore, impacts would be less than significant.

Implementation of the Specific Plan Program would involve the demolition of existing structures, which due to their age, may contain hazardous substances such as ACM, PCBs, or LBP. However, these substances would be removed and disposed of in accordance with all applicable regulations, ensuring impacts would be less than significant. Development activities under the Specific Plan Program may also encounter known or unknown contaminated soils and/or groundwater; however, any identified contaminated soils or groundwater would be required to be remediated and cleaned up under the regulations and supervision of the DTSC and/or RWQCB, thus ensuring impacts remain less than significant.

All hazardous materials used for operations would comply with existing regulations and uses would remain similar to operations that existed prior to Specific Plan Program implementation. Therefore, operational impacts would be less than significant.

Cumulative

The geographical area of the cumulative evaluation of hazardous materials is the Specific Plan Program area as well as the area adjacent to the Specific Plan Program area that could contribute to surface, soil or groundwater contamination within the Specific Plan Program area. Future construction activities within the Specific Plan Program area could occur at the same time as construction activities associated with future growth in the vicinity of the Specific Plan Program. Cumulative construction activities could result in accidental spills of small quantities of hazardous materials such as motor fuels, oils, solvents, and lubricants. Construction BMPs are required for each development project to prevent releases of spills and containment and cleanup of spills. Compliance with existing regulations would reduce potential cumulative hazard impacts from upset and accident conditions to less than significant. Because development within the Specific Plan Program area would also include construction BMPs to prevent releases of spills and containment and cleanup of spills, the Specific Plan Program's contribution to cumulative hazard impacts would be less than cumulatively considerable.

Cumulative growth in the vicinity of the Specific Plan Program area could include commercial and residential projects due to vacant or underutilized parcels near the Specific Plan Program area. If cumulative development involving commercial and residential uses occur adjacent to the Specific Plan Program area, the potential for reasonable upset and accident conditions from these cumulative developments would be less than significant because of the typical small quantities of common hazardous materials such as paints, solvents, and cleaning products that are kept on individual residential and commercial sites. Because the Specific Plan Program would result in a less than significant hazardous waste impact related to reasonable upset and accident conditions, the Specific Plan Program's contribution to cumulative hazardous waste impacts would be less than cumulatively considerable.

Proposed Project Evaluation

Proposed Project-Specific

As with the Specific Plan Program, hazardous materials may be used or encountered during construction and operation of the Proposed Project; however, the transport, use, and disposal of hazardous materials would be required to comply with existing federal, state and local regulations regarding the use and disposal of these materials. In the event of an accidental release during construction or operation of the Proposed Project, containment and clean up would be in accordance with existing applicable regulatory requirements. Construction specifications prepared for the Proposed Project would identify BMPs to ensure the lawful transport, use, and disposal of hazardous materials. Therefore, potential impacts to the public or the environment related to reasonably foreseeable accident conditions involving hazardous materials would be less than significant.

Cumulative

Future cumulative projects in the Project vicinity, such as commercial operations, may use, transport, or dispose of hazardous materials or wastes that could have the potential for upset and accident conditions involving the release of hazardous materials into the environment. Cumulative construction activities could result in accidental spills of small quantities of hazardous materials such as motor fuels, oils, solvents, and lubricants. Construction BMPs are

required for each development project to prevent releases of spills and containment and cleanup of spills. Compliance with existing regulations would reduce potential cumulative hazard impacts from upset and accident conditions to less than significant. Because construction activities associated with the Proposed Project would also include construction BMPs to prevent releases of spills and containment and cleanup of spills, the Proposed Project's contribution to cumulative hazard impacts would be less than cumulatively considerable.

Cumulative growth in the vicinity of the Proposed Project could include commercial and residential projects due to vacant or underutilized parcels. If cumulative development involving commercial and residential uses occur adjacent to the Proposed Project, the potential for reasonable upset and accident conditions from these cumulative developments would be less than significant because of the typical small quantities of common hazardous materials such as paints, solvents, and cleaning products that are kept on individual residential and commercial sites. Because the Proposed Project would result in a less than significant hazardous waste impact related to reasonable upset and accident conditions, the Proposed Project's contribution to cumulative hazardous waste impacts would be less than cumulatively considerable.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project would have a less than significant impact from accident conditions related to hazards and hazardous materials. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in the severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Sensitive Land Uses

Impact 3.9-3: The Specific Plan Program and Proposed Project would result in a less than significant and less than cumulatively considerable impact related to emissions or handling of hazardous materials within one-quarter mile of sensitive land uses because the project would not emit or handle substantial hazardous or acutely hazardous materials, substances, or waste.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Final PEIR identified three schools and one preschool located within the Specific Plan Program area; however, two of the elementary schools (Lincoln Elementary and Barack Obama Charter Elementary) were removed from the area and only one was relocated (Barack Obama Charter School) but relocated beyond one-quarter mile of the Specific Plan Program area. The

Final PEIR also identified five additional schools located within one-quarter mile of the Specific Plan Program area.

Common hazardous materials could be used in the construction and operation of new development in the Specific Plan Program area and within one-quarter mile of an existing school. However, none of these materials would result in substantial hazardous generation and would not be considered acutely hazardous. Furthermore, although proposed residential and commercial uses are likely to use hazardous materials within one-quarter mile of existing schools, these materials would consist of common substances such as paints, solvents, and cleaning products in small quantities. Expansion of medical uses would result in an increase in medical waste generation; however, as previously discussed, compliance with existing regulations would minimize the risk of exposure to sensitive receptors including schools, thus ensuring impacts remain less than significant.

Cumulative

The geographical area of the cumulative evaluation of hazardous materials is the Specific Plan Program area as well as one-quarter mile from the Specific Plan Program area. Cumulative growth in the vicinity of the Specific Plan Program area could include commercial and residential projects due to vacant or underutilized parcels near the Specific Plan Program area. There is an existing area to the east (adjacent to Mona Boulevard in the City of Lynwood) that is zoned and developed with manufacturing uses; however, this area appears fully built out. Future residential and commercial cumulative development could generate hazardous waste; however, the potential for hazardous materials to impact a school use would be less than significant because of the typical small quantities of common hazardous materials used by residential and commercial uses.

Although the future uses within the Specific Plan Program could generate hazardous materials, the existing regulations would minimize potential impacts off of the sites that generate the hazardous materials. Because the Specific Plan Program would result in less than significant impacts on school uses related to hazardous materials, the Specific Plan Program's contribution to cumulative hazardous materials impacts on schools would be less than cumulatively considerable.

Proposed Project Evaluation

Proposed Project-Specific

The Proposed Project would be an expansion of the existing CDU campus that is currently located adjacent to and south of the Project site. In addition, King Drew Magnet High School is located at the intersection of East 120th Street and Compton Avenue approximately 350 feet south of the Project site.

As discussed above, while hazardous materials may be used or encountered during construction and operation of the Proposed Project, the transport, use, and disposal of hazardous materials would be required to comply with existing federal, state and local regulations regarding the use and disposal of these materials. In the event of an accidental release during construction or operation of the Proposed Project, containment and clean up would be in accordance with existing applicable regulatory requirements. Construction specifications prepared for the Proposed Project would identify BMPs to ensure the lawful transport, use, and disposal of

hazardous materials. Therefore, potential Proposed Project impacts from emitting hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within 0.25-mile of an existing or proposed school would be less than significant.

Cumulative

Cumulative projects could be located within or adjacent to an existing or proposed public school and could cause hazard impacts. As mentioned, the Proposed Project would be an expansion of the existing CDU campus located adjacent to the Project site to the south and thus could result in potential impacts. However, compliance with existing federal, state, and local regulations related to an accidental release during construction or operation of the Proposed Project, potential impacts from a potential accidental pill would be minimized to less than significant. Therefore, with compliance with existing federal, state, and local regulations pertaining to the transport, use, and disposal of hazardous materials, the Proposed Project would result in less than significant impacts and would contribute a less than cumulative considerable impact associated with emitting hazardous materials or involve handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project would have a less than significant impact related to the transport, use, and disposal of hazards and hazardous materials within or adjacent to sensitive land uses such as schools. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in the severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Hazardous Materials Site Listing

Impact 3.9-4: The Specific Plan Program includes individual sites that are on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5; however, the Specific Plan Program would result in a less than significant and less than cumulatively considerable impact related to the creation of a significant hazard to the public or the environment.

The Proposed Project area does not include individual sites that are on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5; and therefore, the Proposed Project would not impact or contribute to a cumulative impact associated with the creation of a hazard to the public or the environment.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

As discussed in the Final PEIR, there are two sites within the Specific Plan Program area that are included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. One hazardous materials site (Sky High Cleaners located at 11700 South Wilmington Avenue) is listed as a Cleanup Program Site with an Open-Assessment and Interim Remedial Action status at the time the Final PEIR was published. The second site is a LUST cleanup site (MLK Community Hospital located at 1680 E 120th Street); however, this site has a case closed designation indicating that the property has been sufficiently remediated and no longer poses a significant hazard. Given the Cleanup Program Site is being remediated per federal and state regulations and oversight, impact to public safety and the environment from Specific Plan Program implementation would be less than significant.

Cumulative

The geographical area of the cumulative evaluation of hazardous materials is the Specific Plan Program area as well as the area adjacent to the Specific Plan Program area that contains a hazardous materials site that is listed on the Cortese List that could contribute to surface, soil or groundwater contamination within the Specific Plan Program area. Currently, there are three hazardous materials sites listed on the Cortese List and located adjacent to the Specific Plan Program area. They include the Willow Apartments, the Hooper Texaco Service Station, and the former Mobile Service Station.

The Willow Apartments are located at 12612 South Wilmington Street and is a LUST Cleanup Site. This site maintains an Open-Remediation status. The potential contaminants of concern are petroleum/fuels/oils. The site was historically used as a gas station. Four underground storage tanks were removed, and soil vapor extraction was implemented. The Regional Board letter dated October 24, 2005, issued a soil-only closure which identifies that the site's soils were remediated, and no significant hazardous threat remains associated with soil contamination. Gasoline-related contaminants are present in groundwater beneath the site at elevated concentrations. The lateral and vertical extent of the groundwater contamination has not been determined. However, this site is generally down-gradient from the Specific Plan Program area and therefore would not affect groundwater beneath the Specific Plan Program area.

The Hooper Texaco Service Station is located at 11913 S Compton Avenue and is immediately west of the western boundary of the Specific Plan Program area. This is a LUST site that has an Open – Assessment and Interim Remediation Action as of October 2010. The soil and groundwater are currently being monitored and remediation action is ongoing.

The Mobile Service Station is located approximately 0.2-mile northeast of the Specific Plan Program area. This site included soil and groundwater contamination from several USTs. On February 12, 2012, the LARWQCB issued a case closure letter stating that the extent of soil and groundwater contamination had been adequately defined, that vapor intrusion was not a concern, and that residual contamination was unlikely to have caused a significant human health and/or environmental risk. Therefore, potential impacts on future residents within the Specific Plan Program area would be less than significant.

The two Cortese sites located adjacent to the Specific Plan Program area as well as the onsite Cortese site that has an open status currently have regulatory oversight and contamination at these sites is currently being remediated. Therefore, due to existing regulatory oversite as well as remediation, future development at or in the vicinity of these Cortese sites would result in a less than significant hazard to the public or environment. Because the Specific Plan Program would result in a less than significant hazard to the public or environment due to existing regulatory oversite and remediation at the existing open onsite Cortese-listed site, the Specific Plan Program's contribution to cumulative hazards to the public or environment would be less than cumulatively considerable.

Proposed Project Evaluation

Proposed Project-Specific

As part of the Phase I ESA prepared for the Project, regulatory databases were reviewed for the Project site and properties within the standard search radii as required by California Government Code Section 65962.5. The databases are known as the "Cortese List" and include EnviroStor, GeoTracker, and other lists compiled by the CalEPA. The Project site is not included as a hazardous materials site pursuant to Government Code Section 65962.5. Three properties within one-quarter mile of the Project site are hazardous materials sites; however, as discussed in the Phase I ESA, none of these sites pose an REC to the Project. Therefore, impacts would be less than significant.

Cumulative

Cumulative projects could be located within sites listed as hazardous materials sites pursuant to Government Code Section 65962.5. Therefore, the implementation of cumulative projects could result in significant hazard impacts to the public or the environment associated with a site compiled pursuant to Government Code Section 65962.5. Because the Project site is not on the list of compiled sites pursuant to Government Code Section 65962.5, the Proposed Project would not contribute to cumulative hazard impacts to the public or the environment related to a site compiled pursuant to Government Code Section 65962.5.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

Although the findings of the Final PEIR identified hazardous material sites within the Specific Plan Program area, the future development within the Specific Plan Program area would result in less than significant impacts related to a hazardous materials site. Unlike the Specific Plan Program, the Proposed Project would have no impact related to a hazardous materials site listing because the Project site is not located on a site compiled pursuant to Government Code Section 65962.5. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in the severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Airport Safety

Impact 3.9-5: The Specific Plan Program and Proposed Project are not located within an airport land use plan, and not within two miles of a public airport or public use airport. The Specific Plan Program and the Proposed Project would not result in an impact or contribute to a cumulative impact associated with exposing people residing or working to an airport safety hazard.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Initial Study/Notice of Preparation and Final PEIR identified that the Specific Plan Program area is not located within an airport land use plan or airport approach zone. The nearest public airport is approximately 2.1 miles south of the Specific Plan Program area (Compton/Woodley Airport). Hawthorne Municipal Airport is approximately 4.6 miles west of the Specific Plan Program area and Los Angeles International Airport is approximately 10 miles west of the Specific Plan Program area. Therefore, implementation of the Specific Plan Program would not result in a safety hazard for people residing or working in the vicinity of an airport.

Cumulative

The Final PEIR did not address the cumulative impact of a project located within an airport land use plan since the Specific Plan Program is not located within an airport land use plan or airport approach Zone. Therefore, the Specific Plan Program would result in no impacts and would not contribute cumulative considerable impacts.

Proposed Project Evaluation

Proposed Project-Specific

There are no airports or airstrips within two miles of the Project site. The nearest airport to the Project site is the Compton/Woodley Airport located approximately 2.4 miles south of the site. Hawthorne Municipal Airport is located approximately 4.6 miles west of the Project site. Therefore, the Proposed Project is not located within an airport land use plan or within 2 miles of a public airport or public use airport. No impact would occur.

Cumulative

Cumulative development within an airport land use plan could increase the number of people working or residing in the safety areas of an airport. This increase would need to be evaluated for each individual project. As discussed above, the Proposed Project is not located within an airport land use plan and thus the Proposed Project would have no impact and would not contribute a cumulatively considerable impact associated with exposing people residing or working to an airport safety hazard.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project would have no impact relating to exposing people residing or working to an airport safety hazard because the Project site is not located within an airport land use plan. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in the severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Emergency Response or Evacuation Plan

Impact 3.9-6: The Specific Plan Program and Proposed Project would result in a less than significant and less than cumulatively considerable impact on an emergency response plan or emergency evacuation plan.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Initial Study/Notice of Preparation and Final PEIR identified that the existing County development standards would require new development within the Specific Plan Program area to be designed so as not to interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, Specific Plan Program impacts would be less than significant.

Cumulative

The Final PEIR did not address the cumulative impact on impairing implementation of, or physically interfering with, an adopted emergency response plan or emergency evacuation plan because individual projects within the Specific Plan Program would be required to be designed as to not interfere with such plans. Therefore, the Specific Plan Program would result in no impact and would not contribute to a cumulative considerable impact.

Proposed Project Evaluation

Proposed Project-Specific

The Project site is located in an established urban area that is well served by the surrounding roadway network. Multiple routes exist in the area for emergency vehicles and evacuation, including Compton Avenue to the west, East 118th Street to the south, Wilmington Avenue to the east, as well as the I-105 to the north.

Alameda Street, located approximately one mile east of the Project site and Imperial Highway, located north of the Project site across the I-105 are both designated as Secondary Disaster Routes by the Los Angeles County Department of Public Works (LADPW). I-105, located adjacent to the Project site to the north, is designated as a Primary Disaster Route by LADPW (LADPW, 2012).

The Los Angeles County General Plan includes Goals and Policies that will ensure that emergency response and evacuation is not impaired or interfered with by Project implementation. Policy PS/F 1.2 of the Public Services and Facilities Element of the General Plan requires that adequate services and facilities are provided in conjunction with development through phasing or other mechanisms. Policy S 4.3 of the Safety Element of the General Plan supports coordinating with County and public agencies on emergency planning and response activities, and evacuation planning. Policy S 4.5 of the Safety Element of the General Plan requires that there are adequate resources, such as sheriff and fire services, for emergency response. Compliance with the above policies would limit the impact of the Project on emergency response and evacuation services and would ensure impacts would be less than significant.

Cumulative

Cumulative development in the Willowbrook community would be required to provide adequate emergency access in accordance with local building and fire codes prior to the issuance of a building permit. All cumulative projects must comply with land use policies, requirements for emergency access, such as providing several vehicular access points and roadways of sufficient width to allow access and circulation by large emergency vehicles, such as fire engines. These provisions would reduce cumulative impacts from cumulative development to less than significant. The Proposed Project would be designed and constructed to provide adequate access to allow emergency response and evacuation procedures to continue, which are applicable to the CMC campus. Therefore, the Proposed Project would not interfere with the existing emergency response and evacuation procedures and the Proposed Project's impact on emergency responses and evacuations services would be less than cumulatively considerable.

Applicable Mitigation Measures for the Proposed Project

As with the Approved Project, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project would not interfere with the existing emergency response and evacuation procedures and comply with the County's emergency response and evacuation policies so that impacts are less than significant. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with

respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in the severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Fire Exposure

Impact 3.9-7: The Specific Plan Program and Proposed Project would result in no impact and would not contribute to cumulative impacts associated with the exposure of people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving fires, because the Specific Plan Program and Proposed Project are not located within a high fire hazard area with inadequate access or water and pressure, or within proximity to land uses that have the potential for a dangerous fire hazard.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Initial Study/Notice of Preparation and Final PEIR identified that Specific Plan Program area is not located within a high fire hazard area. The Final PEIR also stated that existing fire flows within and near the Specific Plan Program area are at or above the minimum requirements, and impacts related to fire flow would not occur. In addition, the Specific Plan Program area is not within proximity to land uses that have the potential for a dangerous fire hazard. The Specific Plan Program area is developed and is not in an area with light fuels or unpredictable weather conditions. The existing land uses that include residential, commercial, medical, open space and public uses would not generate potential impacts related to a dangerous fire hazard.

Cumulative

The Final PEIR did not address the cumulative impact on the exposure of people or structures to a significant risk of loss, injury, or death involving fires because the Specific Plan Program area is not located within or near a high fire hazard area, has sufficient water pressure as required by the Fire Department, and is not located in proximity to land uses that have the potential for a dangerous fire hazard. Therefore, the Specific Plan Program would result in no impact and would not contribute to a cumulative considerable impact related to fire exposure of people or structures.

Proposed Project Evaluation

Proposed Project-Specific

According to the Los Angeles County Fire Department, there are no fire hazard severity zones within the Project site and the nearest very high fire hazard severity zone to the Project site is located approximately eight miles northwest of the Project site (Los Angeles County Fire Department, 2024). Because the Proposed Project includes structures with heights proposed greater than allowed in the Specific Plan Program, coordination is occurring with the Los Angeles County Fire Department regarding fire flow requirements. The provision of sufficient water pressure for the implementation of the Proposed Project is a basic requirement and would be provided as part of the Project design so that there would be no impact related to fire exposure of

people or structures due to fire flow. In addition, the Project site is not located within proximity of land uses that have the potential for a dangerous fire hazard. The uses that surround the Project site include residences to the west, residences and CDU school facilities to the south, a parking structure and residences to the east and I-105 to the north. These uses are not related to a dangerous fire hazard. In summary, the implementation of the Proposed Project would not expose people or structures to a significant risk of loss, injury or death involving fires.

Cumulative

Cumulative projects in the vicinity of the Project site are not located with a fire hazard severity zone. The nearest fire hazard severity zone to the Project site is approximately eight miles. Future development in the Project vicinity would be subject to the standards of the California Building Code that are designed to ensure adequate water and pressure are available to meet fire flow requirements. Future cumulative development could include uses that have potential for dangerous fire hazards. However, because the Project would not expose people or structures to a significant risk of loss, injury or death involving fires, the Project would not contribute to cumulative fire hazard impacts.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project is not located within a fire hazard zone, and the potential for fire exposure to people or structures is considered low. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in the severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Fire Hazard

Impact 3.9-8: The Specific Plan Program and Proposed Project do not constitute a potentially dangerous fire hazard, and therefore, the Specific Plan Program and Proposed Project would result in no impacts and would not contribute to cumulative impacts associated with a dangerous fire hazard.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Initial Study/Notice of Preparation and Final PEIR identified that Specific Plan Program would develop and redevelop residential and commercial land uses. None of the uses related to the Specific Plan Program would constitute a potentially dangerous fire hazard. Therefore, dangerous fire hazard impacts would not occur with the implementation of the Specific Plan Program.

Cumulative

The Final PEIR did not address the cumulative impact on creating a dangerous fire hazard because the uses that are proposed as part of the Specific Plan Program do not involve the activities that would cause a dangerous fire hazard. As a result, the Specific Plan Program would not contribute to cumulative impacts associated with a dangerous fire hazard.

Proposed Project Evaluation

Proposed Project-Specific

As with the Specific Plan Program, the Proposed Project does not include uses that are a source of a dangerous fire hazard because the Proposed Project does not involve the storage, use, or transportation of flammable chemicals or other combustible materials. The Proposed Project includes residential, institutional and commercial uses that would not use large quantities of hazardous materials and have the potential to ignite a dangerous fire. Therefore, the Proposed Project would not cause impacts associated with a dangerous fire hazard.

Cumulative

Currently, cumulative projects in the vicinity of the Project site include residential and institutional uses. These uses are not associated with the storage, use, or transportation of flammable chemicals or other combustible materials. Therefore, cumulative projects are not expected to result in impacts associated with a dangerous fire hazard. Because the Proposed Project would not cause impacts associated with a dangerous fire hazard, the Proposed Project would not contribute to cumulative impacts associated with a dangerous fire hazard.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project does not include uses that would cause impacts associated with a dangerous fire hazard. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in the severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

3.9.6 References

County of Los Angeles. 2015. *Los Angeles County General Plan 2035*. Updated 2022. Available at: https://case.planning.lacounty.gov/generalplan/generalplan. Accessed on August 23, 2024.

County of Los Angeles. 2022. Los Angeles County Disaster Routes Map. Available at: https://case.planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_12-6_Disaster_Routes.pdf. Accessed on August 23, 2024.

Los Angeles County Fire Department. 2024. Fire Hazard Severity Zones, LRA. Available at. https://data.lacounty.gov/datasets/bf87f4b1e6954f4697006ff41420c083/explore. Accessed on August 15, 2024.

3.10 Hydrology and Water Quality

3.10.1 Introduction

This section provides an evaluation of the anticipated hydrology and water quality impacts from implementation of the CDU Wellness and Education Campus (Proposed Project). This section includes a summary of the environmental setting and the identification of any applicable changes to the environmental setting that may have occurred since the certification of the Final PEIR. In addition, a summary of the applicable regulatory setting for hydrology and water quality is provided. This section also includes the thresholds of significance, and a brief summary of the hydrology and water quality impacts and mitigation measures addressed in the Final PEIR as well as the potential hydrology and water quality impacts associated with the Proposed Project. Finally, this section provides a conclusion of whether (1) the Proposed Project includes substantial changes that would require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact related to hydrology and water quality; (2) substantial changes in the circumstances under which the Proposed Project is undertaken would require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact related to hydrology and water quality; or (3) new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3) exist related to hydrology and water quality.

The hydrology and water quality impacts associated with the Proposed Project are based on the Preliminary Hydrology Study prepared by KPFF Consulting Engineers in September 2024. The study is located in Appendix G of this Addendum to Final PEIR.

3.10.2 Environmental Setting

Specific Plan Program

The Final PEIR prepared for the Specific Plan Program identified the regional drainage of the Specific Plan Program area to be located within the Los Angeles River Watershed, which encompasses 834 square miles and spans from its headwaters in Santa Monica, Santa Susana, and San Gabriel mountains in the west and north to San Pedro Bay. The watershed encompasses and is shaped by the path of the Los Angeles River, which flows from its headwaters in the mountains eastward to the northern corner of Griffith Park. The channel then turns southward and passes through the Glendale Narrows before flowing across the coastal plain and into San Pedro Bay near Long Beach. As a result of intense urban development, the Los Angeles River has been transformed from what was once an uncontrolled, meandering river providing a valuable source of water for early inhabitants to a mostly channelized flood protection waterway (LACDPW, 2015).

Local drainage travels southward towards Compton Creek. Stormwater run-off from the Specific Plan Program area sheet flows across impervious surfaces, is collected by curbs and gutters, and then conveyed through drop inlets to subterranean storm drains consisting of reinforced concrete piping (RCP) and culverts, which are maintained by the Los Angeles County Flood Control District. All

storm drains receiving runoff from the Specific Plan Program area eventually outlet to Compton Creek, which is located 0.3 miles west of the Specific Plan Program area's western boundary.

The Specific Plan Program area is underlain by the Central Basin, which is 270 square miles in size and underlies portions of the Los Angeles River, Upper San Gabriel, and San Gabriel River/Rio Hondo Enhanced Watershed Management Program areas. Recharge to the Central Basin occurs primarily by engineered recharge of stormwater, imported water, and reclaimed water along the upper reaches of the San Gabriel River and the Rio Hondo via the San Gabriel River Water Conservation System. This system is a series of dams, spreading grounds and instream recharge systems that facilitate groundwater recharge into the Main San Gabriel Basin and Montebello Forebay of the Central Basin. Recycled water has been also delivered for recharge in the Montebello Forebay since 1962. Finally, the Central Basin includes one seawater intrusion barrier, the Alamitos Gap Seawater Intrusion Barrier (AGB), fed by treated imported water along with advanced water treatment recycled water.

As of September of 2015, the groundwater level measured by a well adjacent to the Specific Plan Program area (Well No. 03S13W08J001S located near the intersection of East 119th Street, East 120th Street, and S. Wilmington Avenue) was approximately 155 feet below ground surface (bgs).

Existing Conditions

The Project site encompasses 12.8 acres and the Preliminary Hydrology Study evaluated two portions of the Project site that are divided by East 117th Street. The first portion of the Project site (Site 1) is bounded by East 117th Street to the north, East 118th Street to the south, Compton Avenue to the west, and a parking structure and asphalt parking lot to the east. Site 1 is also bisected on the west side by East 117th Place. The second portion of the Project site (Site 2) is located north of East 117th Street and is bounded by residential neighborhood to the west, East 117th Street to the south, and Interstate 105 (I-105) to the north and east.

The two existing sites can be divided into 4 DMA's. DMA 1 encompasses approximately 27% of the overall Project site and includes the southwest corner of Site 1 which flows to the south to East 118th Street. The runoff flows east to an existing catch basin along East 118th Street. DMA 2 includes the south portion of Site 1 which contains runoff from approximately 51% of the Project site and appears to sheet flow toward the southeast corner of Site 2. The stormwater flows over the sidewalk or through an existing curb face on East 118th Street. The runoff flows east to an existing catch basin along East 118th Street. DMA 3 contains approximately 12% of the Project site runoff which sheet flows over the public sidewalk to the northeast to East 117th Street and flows southeast to an existing catch basin on Holmes Avenue. DMA 4 encompasses Site 2 and includes the north portion of the Project site. DMA 4 encompasses approximately 10% of the Project site which appears to pond at different locations within the vacant lot. The site is naturally lower on the north side, but the lowest point is at the southeast and appears to overflow to East 117th Steet. The runoff flows southeast to an existing catch basin on Holmes Avenue. The stormwater runoff values from the Project site during the 25-year 24-hour storm event that was analyzed using the Los Angeles County Hydrocalc software are shown in **Table 3.10-1,** *Existing 25-Year Flows During 24-Hour Storm Events*.

TABLE 3.10-1
EXISTING 25-YEAR FLOWS DURING 24-HOUR STORM EVENTS

Drainage Management Area (DMA)	Area (Acres)	25-Year Q (CFS)
DMA 1	3.40	6.89
DMA 2	6.56	12.30
DMA 3	1.54	3.98
DMA 4	1.30	2.35

SOURCE: KPFF Consulting Engineers, 2024

Existing stormwater drainage facilities providing stormwater conveyance include a reinforced concrete pipe (RCP) storm drain main on Compton Avenue to the west. Existing catch basins are located along Compton Avenue and East 118th Street, near the intersections of East 118th Street and Compton Avenue. Additionally, there are minimal on-site catch basins and area basins located on the Project site.

Groundwater

Since the certification of the Final PEIR for the Specific Plan Program, Geotechnologies, Inc. prepared a Geotechnical Engineering Investigation for the Project site in November 2021 that includes 12 boring samples. Groundwater was encountered between 50.5 feet and 55 feet below the ground surface.

Flood Hazards

The Project site is located within the unincorporated Los Angeles County. According to the most recent Flood Insurance Rate Map (FIRM) that covers the Project site and vicinity (FIRM NO. 06037C1815F, 2008), the Project site is not within a 100-year or 500-year floodplain (Federal Emergency Management Agency, 2008). Additionally, the Project site is not designated as an Area of Special Flood Hazard by FEMA under the National Flood Insurance Program (NFIP).

Seiches

A seiche is a surface wave created when an inland water body is shaken, usually by an earthquake. No surface water bodies pose a flood hazard to the Project site due to a seiche (Geotechnologies, Inc., 2021).

Tsunamis

A tsunami is an ocean wave caused by a sudden displacement of the ocean floor, most often due to earthquakes. The Project site is not at risk of flooding from tsunami because it is about 13 miles east from the ocean (Geotechnologies, Inc., 2021).

Mudflows

Mudflows are flowing masses of fine-grained earth material with a high degree of fluidity and happen on slopes. The Specific Plan Program area is developed, with a flat topography and does not have enough exposed soils or topography to be a risk of mudflow (Geotechnologies, Inc., 2021).

3.10.3 Regulatory Setting

Federal

Clean Water Act

The Federal Water Pollution Control Act (33 U.S.C. 1251 et. sec.) as amended by the Federal Water Pollution Control Act Amendments of 1972, also known as the Clean Water Act (CWA), states that the discharge of pollutants to waters of the United States from any point source is unlawful, unless the discharge is in compliance with a National Pollutant Discharge Elimination System (NPDES) permit. Amendments to the CWA added a section that established a framework for regulating municipal and industrial (M&I) stormwater discharges under the NPDES program. On November 16, 1990, the U.S. Environmental Protection Agency (USEPA) published final regulations, under the 1987 CWA Amendments, which establish application requirements for stormwater permits.

Clean Water Act Section 402

CWA Section 402 regulates discharges to surface waters of the United States through the NPDES program. In California, the USEPA authorizes the State Water Resources Control Board (SWRCB) to oversee the NPDES program through the Regional Water Quality Control Boards (RWQCBs).

Stormwater discharges are also regulated under CWA Section 402. Construction activities disturbing one acre of land or greater must be covered under the SWRCB General Construction Activity Stormwater Permit. The permit requires preparation of a Stormwater Pollution Prevention Plan (SWPPP) for construction activities. A SWPPP prepared in compliance with the General Permit describes the site, erosion and sediment controls, runoff water quality monitoring, means of waste disposal, implementation of approved local plans, control of post-construction sediment and erosion control measures and maintenance responsibilities, and non-stormwater management controls. Dischargers are also required to inspect construction sites before and after storms to identify stormwater discharge from construction activity, and to identify and implement controls where necessary.

State

National Pollutant Discharge Elimination Program

The NPDES permit program is administered in the State of California by the RWQCBs and was first established under the authority of the CWA to control water pollution by regulating point sources that discharge pollutants into waters of the United States. If discharges from industrial, municipal, and other facilities go directly to surface waters, those project applicants must obtain permits. An individual NPDES permit is specifically tailored to a facility. A general NPDES permit covers multiple facilities within a specific activity category such as construction activities. A general permit applies with same or similar conditions to all dischargers covered under the general permit.

Construction General Permit

The State of California adopted a Statewide NPDES Permit for General Construction Activity (Construction General Permit) on September 8, 2022 (Order No. 2022-0057-DWQ. The 2022 Construction General Permit became effective on September 1, 2023. The Construction General Permit regulates construction site storm water management. Dischargers whose projects disturb one or more acres of soil, or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the general permit for discharges of storm water associated with construction activity. Construction activity subject to this permit includes clearing, grading, and disturbances to the ground, such as stockpiling or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility.

The Construction General Permit (CGP) requires the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP) that includes specific Best Management Practices (BMPs) designed to prevent pollutants from contacting stormwater and keep all products of erosion from moving off-site into receiving waters. Types of BMPs include erosion control (e.g., preservation of vegetation), sediment control (e.g., fiber rolls), non-stormwater management (e.g., water conservation), and waste management. The SWPPP also includes descriptions of BMPs to reduce pollutants in storm water discharges after all construction phases have been completed at the site (post-construction BMPs). The SWPPP BMPs are intended to protect surface water quality by preventing the off-site migration of eroded soil and construction-related pollutants from the construction area. Routine inspection of all BMPs is required under the provisions of the CGP. In addition, the SWPPP is required to contain a visual monitoring program, a chemical monitoring program for nonvisible pollutants, and a sediment monitoring plan if the site discharges directly to a water body listed on the 303(d) list for sediment.

In the project area, the CGP is implemented and enforced by the Los Angeles Regional Water Quality Control Board (LARWQCB), which administers the stormwater permitting program. Dischargers are required to electronically submit a Notice of Intent (NOI) and permit registration documents (PRDs) to obtain coverage under this CGP. Dischargers are responsible for notifying the LARWQCB of violations or incidents of noncompliance, as well as for submitting annual reports identifying deficiencies of the BMPs and how the deficiencies were corrected.

Municipal Stormwater Permitting (MS4)

The State's Municipal Stormwater Permitting Program regulates stormwater discharges from Municipal Separate Storm Sewer Systems (MS4s). MS4 Permits were issued in two phases. Phase I was initiated in 1990, under which the RWQCBs adopted NPDES stormwater permits for medium (serving between 100,000 and 250,000 people) and large (serving more than 250,000 people) municipalities. As part of the Phase II, the SWRCB adopted a General Permit for small MS4s (serving less than 100,000 people) and non-traditional small MS4s including governmental facilities such as military bases, public campuses, and hospital complexes.

Regional and Local

Los Angeles Regional Water Quality Control Plan

The preparation and adoption of water quality control plans (Basin Plans) is required by the California Water Code (Section 13240) and supported by the CWA. Section 303 of the CWA requires states to adopt water quality standards which "consist of the designated uses of the navigable waters involved and the water quality criteria for such waters based upon such uses." According to Section 13050 of the California Water Code, Basin Plans consist of a designation or establishment for the waters within a specified area of beneficial uses to be protected, water quality objectives to protect those uses, and a program of implementation needed for achieving the objectives. Because beneficial uses, together with their corresponding water quality objectives, can be defined per Federal regulations as water quality standards, the Basin Plans are regulatory references for meeting the State and Federal requirements for water quality control.

County of Los Angeles Stormwater Pollution Control Requirements for Construction Activities

To comply with the Phase II General Construction Permit, the County of Los Angeles has established a set of BMPs with which all permitted construction activities on unincorporated county lands must comply. The BMPs, which are based on the state's Stormwater Best Management Practices Handbook (CASQA, 2003), are as follows:

- Eroded sediments and other pollutants must be retained on site and may not be transported from the site via sheet flow, swales, area drains, natural drainage courses or wind.
- Stockpiles of earth and other construction related materials must be protected from being transported from the site by the forces of wind or water.
- Fuels, oils, solvents and other toxic materials must be stored in accordance with their listing and are not to contaminate the soil and surface waters. All approved storage containers are to be protected from the weather. Spills must be cleaned up immediately and disposed of in a proper manner. Spills may not be washed into the drainage system.
- Non-stormwater runoff from equipment and vehicle washing and any other activity shall be contained at the Project site.
- Excess or waste concrete may not be washed into the public way or any other drainage system. Provisions shall be made to retain concrete wastes on site until they can be disposed of as solid waste.
- Trash and construction related solid wastes must be deposited into a covered receptacle to prevent contamination of rainwater and dispersal by wind.
- Sediments and other materials may not be tracked from the site by vehicle traffic. The construction entrance roadways must be stabilized so as to inhibit sediments from being deposited into the public way. Accidental depositions must be swept up immediately and may not be washed down by rain or other means.
- Any slopes with disturbed soils or denuded of vegetation must be stabilized so as to inhibit erosion by wind and water.

The Los Angeles County Department of Public Works may identify and require additional BMPs, as appropriate.

Los Angeles County Municipal Separate Storm Sewer System Permit

The current Municipal Separate Storm Sewer System (MS4) Permit for Los Angeles County (Order No. R4-2012-0175-A01) was adopted on November 8, 2012 and amended on September 8, 2016 (LARWQCB, 2012). Order No. R4-2012-0175-A01 includes: Los Angeles County Flood Control District, County of Los Angeles, and 84 incorporated cities within the County watersheds excluding the City of Long Beach. The permit contains requirements that are necessary to improve efforts to reduce the discharge of pollutants in storm water runoff to the maximum extent practicable (MEP) and achieve water quality standards. This permit requires that runoff be addressed during the major phases of urban development (planning, construction, and operation) in order to reduce the discharge of pollutants from storm water to the MEP, effectively prohibit non-storm water discharges and protect receiving waters.

The MS4 Permit also includes construction requirements for implementation of minimum construction site BMPs for erosion, sediment, non-storm water management and waste management on construction sites, which are listed in **Table 3.10-2,** *Minimum BMPs for Construction Sites,* below.

TABLE 3.10-2
MINIMUM BMPS FOR CONSTRUCTION SITES

Erosion Controls	Scheduling
	Preservation of Existing Vegetation
Sediment Controls	Silt Fence
	Sandbag Barrier
	Stabilized Construction Site Entrance/Exit
Non-Storm Water Management	Water Conservation Practices
	Dewatering Operations
Waste Management	Material Delivery and Storage
	Stockpile Management
	Spill Prevention and Control
	Solid Waste Management
	Concrete Waste Management
	Sanitary/Septic Waste Management

SOURCE: LARWQCB, 2012

County of Los Angeles Low Impact Development Manual

The Los Angeles County Department of Public Works (LACPWD) prepared the Low Impact Development Standards Manual (LACPWD, 2014) to comply with the requirements of the 2012 MS4 Permit and supersede the County Standard Urban Stormwater Mitigation Plan. The LID Standards Manual provides guidance for the implementation of stormwater quality control measures in new development and redevelopment projects in unincorporated areas of the County with the intention of improving water quality and mitigating potential water quality impacts from stormwater and non-stormwater discharges. Unlike traditional stormwater management, which

collects and conveys stormwater runoff through storm drains, pipes, or other conveyances to a centralized stormwater facility, LID uses site design and stormwater management to maintain the site's pre-development runoff rates and volumes. The goal of LID is to mimic a site's pre-development hydrology by using design techniques that infiltrate, filter, store, evaporate, and detain runoff close to the source of rainfall.

The LID Standards Manual describes stormwater management requirements for Designated Projects, which are identified as meeting one or more of the following:

- All development projects equal to one acre or greater of disturbed area and adding more than 10,000 square feet of impervious surface area;
- Industrial parks with 10,000 square feet or more of surface area;
- Commercial malls with 10,000 square feet or more of surface area;
- Retail gasoline outlets with 5,000 square feet or more of surface area;
- Restaurants (Standard Industrial Classification [SIC] Code 5812) with 5,000 square feet or more of surface area;
- Parking lots with 5,000 square feet or more of impervious surface area, or with 25 or more parking spaces;
- Automotive service facilities (SIC Codes: 5013, 5014, 5511, 5541, 7532-7534, or 7536-7539) with 5,000 square feet or more of surface area;
- Projects located in or directly adjacent to, or discharging directly to a Significant Ecological Area (SEA), where the development will:
  - Discharge stormwater runoff that is likely to impact a sensitive biological species or habitat; and
  - Create 2,500 square feet or more of impervious surface area.
- Redevelopment projects, which are developments that result in creation or addition or replacement of either: (1) 5,000 square feet or more of impervious surface on a site that was previously developed as described in the above bullets; or (2) 10,000 square feet or more of impervious surface area on a site that was previously developed as a single family home.

Once a project has been established as a Designated Project, the project operator must: conduct site assessment and identify design considerations, including determining the feasibility of on-site infiltration; apply site-specific source control measures; calculate the Stormwater Quality Design Volume (SWQDv); implement stormwater quality control measures; implement alternative compliance measures; implement hydromodification requirements; and develop a Maintenance Plan. The LID Ordinance requires that all Designated Projects retain the SWQDv on-site using retention-based stormwater quality control measures (infiltration and/or stormwater runoff harvest and use). LID practices or stormwater quality control measures can be categorized into the following types:

- Retention-based stormwater quality control measures (bioretention, infiltration basin, dry well, permeable pavement, etc.)

- Biofiltration (e.g., biofiltration area)
- Vegetation-based stormwater quality control measures (e.g., stormwater planter, vegetated swale, green roof, etc.)
- Treatment-based stormwater quality control measures (e.g., sand filter, constructed wetland, propriety treatment control measures)

In the event that 100 percent retainment of the SWQDv onsite is technically infeasible, at least one of the following alternative compliance measures must be implemented: On-site biofiltration of 1.5 times the volume of the SWQDv that is not reliably retained on-site;

- On-site treatment and off-site infiltration/bioretention of the volume of the SWQDv that is not reliably retained on-site;
- Replenishment of groundwater supplies that have a designated beneficial use in the Basin Plan; or
- On-site treatment and off-site infiltration/bioretention or stormwater runoff harvest and use of the volume of SWQDv that is not reliably retained on-site through retrofit an existing development with similar land uses as the project.

The LID Standards Manual also has requirements for Non-Designated Projects. For small-scale Non-Designated Projects (residential development and redevelopment of four units or less), at least two of the following simple BMPs into the site design: porous pavement, downspout routing, disconnection of impervious surfaces, dry wells, landscaping and landscape irrigation interception of runoff, or green roofs. For large-scale Non-Designated Projects (all Non-Designated residential developments of five units or greater and all non-residential, Non-Designated Projects), the change in SWQDv must be retained through infiltration, evapotranspiration, stormwater runoff harvest and use, or a combination thereof unless technically infeasible. To meet these requirements, large-scale Non-Designated Projects must conduct site assessment and identify design considerations, apply site-specific source control measures; calculate the change in SWQDv, implement stormwater quality control measures; implement any necessary hydromodification requirements, and develop a maintenance plan, if necessary.

Los Angeles County General Plan

The most recent version of the Los Angeles County General Plan was adopted in October 2015. The following goals and policies pertain to hydrology and water quality.

Goal C/NR 5: Protected and usable local surface water resources.

Policy C/NR 5.1: Support the LID philosophy, which seeks to plan and design public and private development with hydrologic sensitivity, including limits to straightening and channelizing natural flow paths, removal of vegetative cover, compaction of soils, and distribution of naturalistic BMPs at regional, neighborhood, and parcel-level scales.

Policy C/NR 5.2: Require compliance by all County departments with adopted Municipal Separate Storm Sewer System (MS4), General Construction, and point source NPDES permits.

Policy C/NR 5.3: Actively engage with stakeholders in the formulation and implementation of surface water preservation and restoration plans, including plans to improve impaired surface water bodies by retrofitting tributary watersheds with LID types of BMPs.

Policy C/NR 5.4: Actively engage in implementing all approved Enhanced Watershed Management Programs/Watershed Management Programs and Coordinated Integrated Monitoring Programs/Integrated Monitoring Programs or other County-involved TMDL implementation and monitoring plans.

Policy C/NR 5.6: Minimize point and non-point source water pollution.

Policy C/NR 5.7: Actively support the design of new and retrofit of existing infrastructure to accommodate watershed protection goals, such as roadway, railway, bridge, and other— particularly—tributary street and greenway interface points with channelized waterways.

Goal C/NR 6: Protected and usable local groundwater resources.

Policy C/NR 6.1: Support the LID philosophy, which incorporates distributed, post-construction parcel-level stormwater infiltration as part of new development.

Policy C/NR 6.2: Protect natural groundwater recharge areas and regional spreading grounds.

Policy C/NR 6.3: Actively engage in stakeholder efforts to disperse rainwater and stormwater infiltration BMPs at regional, neighborhood, infrastructure, and parcel-level scales.

Policy C/NR 6.4: Manage the placement and use of septic systems in order to protect high groundwater.

Policy C/NR 6.5: Prevent stormwater infiltration where inappropriate and unsafe, such as in areas with high seasonal groundwater, on hazardous slopes, within 100 feet of drinking water wells, and in contaminated soils.

Goal C/NR 7: Protected and healthy watersheds.

Policy C/NR 7.1: Support the LID philosophy, which mimics the natural hydrologic cycle using undeveloped conditions as a base, in public and private land use planning and development design.

Policy C/NR 7.2: Support the preservation, restoration and strategic acquisition of available land for open space to preserve watershed uplands, natural streams, drainage paths, wetlands, and rivers, which are necessary for the healthy function of watersheds.

Policy C/NR 7.3: Actively engage with stakeholders to incorporate the LID philosophy in the preparation and implementation of watershed and river master plans, ecosystem restoration projects, and other related natural resource conservation aims, and support the implementation of existing efforts, including Watershed Management Programs and Enhanced Watershed Management Programs.

Policy C/NR 7.4: Promote the development of multi-use regional facilities for stormwater quality improvement, groundwater recharge, detention/attenuation, flood management, retaining non-stormwater runoff, and other compatible uses.

3.10.4 Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines and the County of Los Angeles Environmental Checklist Form, the project could have a significant impact related to hydrology and water quality if it would:

- Violate any water quality standards or waste discharge requirements (see Impact 3.10-1, below).
- Substantially decrease groundwater supplies or interfere with groundwater recharge such that the project may impede sustainable groundwater management of the basin (see Impact 3.10-2, below).
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would result in substantial erosion or siltation on- or off-site (See Impact 3.10-3, below).
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would result in a substantial increase in the amount of surface run-off in a manner which would result in flooding on- or off-site (See Section 3.10-4, below).
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would result in creating or contributing run-off water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted run-off (See Impact 3.10-5, below).
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would impede or redirect flood flows that would expose existing housing or other insurable structures in a Federal 100-year flood hazard area or County Capital Flood floodplain to a significant risk of loss or damage involving flooding (see Impact 3.10-6).
- Otherwise place structures in Federal 100-year flood hazard or County Capital Flood floodplain areas that would require additional flood proofing and flood insurance requirements (see Impact 3.10-7).
- Conflict with the Los Angeles County Low Impact Development Ordinance (Los Angeles County Code, Title 12, Ch. 12.84) (See Impact 3.10-8, below).

- Use onsite wastewater treatment systems in areas with known geological limitations (e.g., high groundwater) or in close proximity to surface water (including, but not limited to, streams, lakes, and drainage course) (See Impact 3.10-9, below).
- In flood hazard, tsunami, or seiche zones, risk of pollutants due to project inundation (see Impact 3.10-10, below).
- Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan (see Impact 3.10-11, below).

3.10.5 Impact Analysis

Water Quality Standards/Waste Discharge Requirements

Impact 3.10-1: The Specific Plan Program and Proposed Project would not violate or contribute to a cumulative violation of water quality standards or waste discharge requirements.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

Construction

As identified in the Final PEIR, construction activities associated with the Specific Plan Program could expose and loosen sediment and onsite concrete foundations and asphalt that have the potential to mix with storm water and urban runoff and degrade surface and receiving water quality. However, each development within the Specific Plan Program area would be required to comply with NPDES requirements, and BMPs would be in place to prevent potentially harmful materials from accidentally spilled or improperly disposed of during construction activities. These BMPs would also substantially reduce the potential for contaminated surface water to wash into and pollute surface waters or groundwater.

Future development projects disturbing more than an acre of ground surface would be required to develop a SWPPP as part of the compliance with the Construction General Permit that implements BMPs designed to prevent water quality degradation. Types of BMPs include erosion control, sediment control, waste management, and post-construction, all of which would prevent the introduction of pollutants into runoff, and consequentially, receiving waters. Projects disturbing less than an acre of ground surface during construction would not be required to prepare a SWPPP but would be required to implement the minimum BMPs required by the Los Angeles County MS4 Permit, thereby protecting water quality. Therefore, all permitted construction activities in the Project area would be required to implement the BMPs specified in the County Stormwater Pollution Control Requirements for Construction Activities and thus, construction impacts related to water quality standards or waste discharge requirements from implementation of the Specific Plan Program would be less than significant.

Operation

Since the Specific Plan Program area is developed and approximately 80 to 90 percent impervious, buildout of the Specific Plan Program is expected to generate little or no increase in runoff to the existing stormwater drainage system. New development in accordance with the Specific Plan

Program would be required to meet MS4 Permit requirements through compliance with the County LID Standards Manual. Future development would be required to retain the estimated Stormwater Quality Design Volume (SWQDv) through implementation of retention, biofiltration, vegetation-based, and/or treatment-based stormwater quality control measures. If retainment of the SWQDv is not technically feasible, Designated Projects would be required to treat the SWQDv prior to its release or contribute to groundwater recharge. Large-scale Non-Designated Projects would implement stormwater quality control measures to retain the change in SWQDv and small-scale Non-designated Projects would be required to implement specific site design BMPs to filter and/or reduce runoff. By retaining and/or treating runoff onsite, the amount of potentially pollutant-laden runoff leaving the site and contaminating receiving waters would be reduced.

As specified by the Sustainable Design Criteria for the Specific Plan Program, walkways and plazas shall be designed to collect stormwater, when feasible. In addition, the majority of plant materials used for landscaping would be drought tolerant, thus indicating irrigation (and associated dry weather flows) would not be excessive. Green roofs would also be encouraged for development to reduce the quantity of water entering the storm drain system. Finally, Green Streets and LID strategies such as the use of vegetated swales and decomposed granite, should be followed to manage stormwater, improve water quality, reduce flows and enhance watershed health. Compliance with applicable regulations and implementation of the Sustainable Design Criteria would minimize pollutants being transported offsite into downstream receiving waters, and projects implemented in accordance with the Specific Plan Program would not violate water quality standards or waste discharge requirements.

Cumulative

The geographic scope for cumulative impacts related to water quality standards and waste discharge requirements includes the Los Angeles River watershed. As mentioned, the Specific Plan Program and cumulative development would be required to comply with all pertinent regulations, such as the Construction General Permit, County Stormwater Pollution Control Requirements for Construction Activities, and the County LID Standards Manual. To comply with these regulations, BMPs would be required to decrease potential pollutant loadings in stormwater runoff and reduce runoff quantities. Compliance with these water quality regulations by cumulative projects would minimize pollutants being transported to downstream receiving waters, and these cumulative projects would not violate water quality standards or waste discharge requirements. Because the Specific Plan Program would implement the Sustainable Design Criteria and be in compliance with all applicable regulations, pollutants transported offsite into downstream receiving waters would be minimized. Therefore, the Specific Plan Program's contribution to cumulative impacts associated with a violation of water quality standards or waste discharge requirements would be less than cumulatively considerable.

Proposed Project Evaluation

Proposed Project-Specific

Construction

The use of construction materials, such as fuels, solvents, antifreeze, byproducts of combustion, as well as fertilizers, herbicides, pesticides, and other pollutants used for the Proposed Project may present a risk to surface water quality. Construction vehicles and other equipment on-site during

construction may result in oil, grease, or related pollutant leaks and spills that may discharge into the stormwater drain system. To minimize these potential impacts, the Proposed Project would comply with the NPDES regulations and would include a SWPPP with BMPs to prevent stormwater from contacting waste materials and other pollutants in the construction zones. Thus, the Proposed Project would comply with all local, state, and federal regulations that would ensure the Proposed Project would not violate any water quality standards during construction.

Operation

Waste material dumped into storm drain inlets can adversely impact surface and ground waters. Any material discharged into the storm drain system has the potential to significantly impact downstream receiving waters. As identified in the Preliminary Hydrology Report prepared for the Proposed Project, dated September 2024, the Proposed Project would increase the amount of impervious surfaces on the Project site from approximately 39 percent to approximately 70 percent. This increase in stormwater is planned to be collected and conveyed within an onsite stormwater drainage system prior to conveyance off the Project site. The onsite drainage system includes a system of drainage pipes, storage tanks, drywells and CDS units that screen, separate, and trap debris, sediment, and hydrocarbons from stormwater runoff. The proposed stormwater drainage system would retain stormwater on the Project site so that stormwater flows exiting from the Project site during a 25-year storm event would be the same under the Project compared to the existing stormwater flow exiting from the Project site as shown in **Table 3.10-3,** *Existing and Proposed 25-Year Flows During 24-Hour Storm Events*. Therefore, the stormwater flow from the Project site would not increase the demand on the existing downstream storm drain infrastructure.

TABLE 3.10-3
EXISTING AND PROPOSED 25-YEAR FLOWS DURING 24-HOUR STORM EVENTS

Drainage Management Area (DMA)	Area (Acres)	Existing 25-Year Qs (CFS) Exiting Project site	Proposed Onsite Retention of 25-Year Qs (CFS)	Proposed 25-Year Qs (CFS) Exiting Project site with Onsite Retention
DMA 1	3.40	6.89	2.44	6.89
DMA 2	6.56	12.30	0.02	12.30
DMA 3	1.54	3.98	0.29	3.98
DMA 4	1.30	2.35	0.60	2.35

SOURCE: KPFF Consulting Engineers, 2024

The proposed stormwater drainage system would comply with the County of Los Angeles Department of Public Works Low Impact Development Standards Manual as well as the NPDES. Therefore, the Proposed Project would not violate water quality standards or waste discharge requirements.

Cumulative

Future growth associated with cumulative projects has the potential to contribute to pollutant loading during construction and operation, which could potentially result in cumulative impacts to water quality. However, all new construction would be subject to the NPDES Permit Requirements. Each related project greater than one acre in size would be required to develop a

SWPPP for construction and grading activities. In addition, all new construction plans would be evaluated individually to determine the appropriate BMPs and treatment measures to minimize future growth impacts to water quality. Operation of the cumulative projects would implement operational BMPs to address water quality of stormwater runoff from surfaces such as parking lots. With compliance to the NPDES and incorporation of operational BMPs, cumulative projects would result in less than significant water quality impacts. Because the Proposed Project would also comply with the NPDES and include BMPs, the Proposed Project's contribution to cumulative water quality impacts would be less than significant.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project would have a less than significant impact related to water quality standards and waste discharge requirements. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in the severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Groundwater Supplies and Recharge

Impact 3.10-2: The Specific Plan Program and Proposed Project would result in a less than significant and less than cumulatively considerable impact on the depletion of groundwater supplies or interference with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

As discussed in the Final PEIR, infill and redevelopment that would occur with implementation of the Specific Plan Program would result in population growth; thereby increasing demand on water supplies. The Specific Plan Program would add approximately 1,952 residential dwelling units and 2,666,035 square feet of commercial space to the Specific Plan Program area. The Specific Plan Program area receives water from Liberty Utilities (Liberty), Golden State Water Company (GSWC), and Los Angeles Department of Water and Power (LADWP). All three water purveyors have pumping rights to obtain their groundwater from the Central Groundwater Basin. Because groundwater withdrawals from the Central Groundwater Basin are limited based on the adjudication, compliance with the judgment that set pumping rights would eliminate the potential for the water agencies, that would serve the Specific Plan Program area, to impact the groundwater aquifer. Therefore, the implementation of the Specific Plan Program would result in less than significant impacts on the Central Groundwater Basin from groundwater use.

As described above, the Central Basin underlies the Specific Plan Program area; however, the majority (80 to 90 percent) of the Specific Plan Program area is developed and impervious and thus does not have much groundwater recharge potential. The Specific Plan Program development would not substantially increase the amount of impervious surfaces in the Specific Plan Program area. As stated previously, the Central Basin is recharged by stormwater, imported water, and reclaimed water along the upper reaches of the San Gabriel River and the Rio Hondo via the San Gabriel River Water Conservation System, which is located several miles away from the Specific Plan Program area. Thus, the Specific Plan Program would not reduce the groundwater recharge potential of the Specific Plan Program area. In addition, the depth of groundwater in the vicinity of the Specific Plan Program area is approximately 155 feet below ground surface. Thus, excavation for development in the Specific Plan Program area would not come into contact with groundwater or require dewatering during excavation activities such that groundwater levels would be adversely affected. Further, since groundwater is not currently close to the ground surface, stormwater infiltration BMPs (as described in the County LID Standards Manual) would be technically feasible onsite, the use of which could increase the amount of groundwater recharge in the Project area compared to existing conditions. Therefore, the implementation of the Specific Plan Program would result in less than significant impacts to the existing recharge capabilities of the area overlying the Central Groundwater Basin.

Cumulative

The geographic scope for cumulative impacts related to groundwater impacts includes the approximately 227 square-mile service area of the Central Groundwater Basin. This service area extends from East Los Angeles to the north to Signal Hill to the south and from Willowbrook to the west to La Habra Heights to the east. As cumulative development growth occurs within the Central Groundwater Basin, the water purveyors that would serve the future development would use groundwater as well as other water supplies to meet the future demand. However, each water purveyor that has rights to groundwater from the Central Groundwater Basin are limited based on the adjudication that established the pumping rights for each purveyor. Because groundwater withdrawals from the Central Groundwater Basin are limited based on the adjudication, compliance with the judgment that set pumping rights would eliminate the potential for the water agencies, that would serve cumulative development growth, to impact the groundwater aquifer. Therefore, the implementation of cumulative development would result in less than significant impacts on the Central Groundwater Basin from groundwater use.

As stated previously, groundwater recharge for the Central Groundwater Basin occurs along the upper reaches of the San Gabriel River and the Rio Hondo via the San Gabriel River Water Conservation System. These areas have been established as groundwater recharge areas. Much of the remaining area overlying the Central Groundwater Basin contains impervious surfaces. Therefore, cumulative development would not impact groundwater recharge capabilities within the Central Groundwater Basin. As a result, the implementation of cumulative development would result in less than significant impacts to recharge capabilities.

Because the Specific Plan Program would result in less than significant impacts on the Central Groundwater Basin and the recharge capabilities of the basin, the Specific Plan Program's contribution to impacts on the Central Groundwater Basin is less than cumulatively considerable.

Proposed Project Evaluation

Proposed Project-Specific

The Project site would be served by Liberty, which would not increase the groundwater demand as Liberty has pumping limits on the amount of groundwater withdrawals allowed from the Central Groundwater Basin. As discussed above, the Proposed Project would increase the existing onsite impervious surfaces from approximately 39 percent to approximately 70 percent under the Proposed Project. This increase in impervious surfaces would increase the amount of stormwater flow. As discussed above, this increase in stormwater flow would be retained onsite so that the amount of stormwater existing the Project site under a 25-year storm would not exceed the amount of stormwater exiting the Project site during a 25-year storm event under existing conditions. The proposed stormwater facilities include a system of storage tanks and drywells so that runoff could be discharged through infiltration into the subsoil and eventually to the groundwater basin. As described in the Preliminary Hydrology Study, the volume provided by the proposed drywells and storage tanks is approximately 27,915 cubic feet. Although the Proposed Project would reduce the amount of impervious surfaces on the Project site, the proposed stormwater facilities would provide groundwater infiltration so that the Proposed Project would not reduce the amount of groundwater recharge and therefore, the Proposed Project would result in less than significant impacts to the existing recharge capabilities of the Project site overlying the Central Groundwater Basin.

Cumulative

Future growth associated with cumulative projects has the potential to deplete or interfere with groundwater because pervious surfaces would be replaced with impervious surfaces. However, cumulative projects are not proposed within areas that are currently used for recharging the groundwater system. Therefore, cumulative projects would not deplete groundwater supplies or interfere with groundwater recharge, and cumulative impacts would be less than significant. Because the Proposed Project would include stormwater facilities that would provide groundwater infiltration on the Project site, the Proposed Project's contribution to cumulative groundwater impacts would be less than cumulatively considerable.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project would have a less than significant impact related to groundwater supplies and recharge. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in the severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Erosion/Siltation

Impact 3.10-3: The Specific Plan Program and Proposed Project would result in a less than significant and less than cumulatively considerable impact from the alteration of the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would result in substantial erosion or siltation on- or off-site.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

Construction

As discussed in the Final PEIR, Project construction would include excavation and the disturbance of the existing ground surface, thereby exposing bare soil and temporarily altering surface drainage patterns with the potential to cause erosion and siltation. However, construction activities would be required to implement erosion and sediment control BMPs required by the Construction General Permit and MS4 Permit regulations. Compliance with these regulations would ensure substantial erosion or siltation does not occur onsite. These requirements would include the implementation of BMPs as required by the County Pollution Control Requirements for Construction Activities. With implementation of erosion and sediment control BMPs, project construction activities would result in less than significant erosion and siltation impacts.

Operation

Development within the Specific Plan Program area would not involve the alteration of a stream or river. Since the majority of the area is developed and approximately 80 to 90 percent impervious, buildout of the Specific Plan Program development is expected to generate little or no increase in runoff to the existing stormwater drainage system. The County LID Standards Manual requires the use of stormwater quality control measures to reduce the potential for erosion and siltation. The measures include the use of retention, biofiltration, vegetation-based, and/or treatment-based stormwater quality measures. Because the majority of the Specific Plan Program is already developed, new development is required to implement the County LID Standards Manual, and the Specific Plan Program includes Sustainable Design Criteria, the implementation of development within the Specific Plan Program area would result in a less than significant erosion and siltation impact during project operation.

Cumulative

The geographic scope for cumulative impacts related to erosion and siltation includes areas within the watershed that conveys stormwater to Reach 1 of the Los Angeles River. Cumulative development within the Los Angeles River watershed would increase erosion and sedimentation to the Los Angeles River. However, as cumulative development is constructed and operated, regulations such as NPDES requirements, County Stormwater Pollution Control Requirements for Construction Activities, and County LID Standards Manual requirements are required to be implemented. With the implementation of these regulations, cumulative development would result in less than cumulatively significant erosion and siltation impacts during project construction and operational activities.

Because the Specific Plan Program is required to implement NPDES requirements, the County Stormwater Pollution Control Requirements for Construction Activities and the requirements within County LID Standards Manual, potential erosion and siltation impacts would be reduced. In addition, the Specific Plan Program includes design features from the Sustainable Design Criteria that would also reduce potential erosion and siltation during operational activities. With the implementation of the above requirements, the Specific Plan Program would result in a less than cumulatively considerable impact related to erosion and siltation.

Proposed Project Evaluation

Proposed Project-Specific

As with the Specific Plan Program, the Proposed Project would include excavation and the disturbance of the existing ground surface resulting in bare soil and temporarily altering surface drainage patterns that have the potential to cause erosion and siltation. However, the Proposed Project would implement erosion and sediment control BMPs required by the Construction General Permit and MS4 Permit regulations. Compliance with these regulations would ensure that construction activities would result in less than significant impacts.

Additionally, there is no stream or river within or adjacent to the Project site and thus, operation of the Proposed Project would not alter the course of a stream or river, which would result in substantial erosion or siltation. Although the Proposed Project would increase the amount of impervious surfaces from approximately 39 percent to approximately 70 percent on the Project site, the Proposed Project would comply with the County LID Standards Manual for stormwater quality control measures and thereby reducing potential impacts associated with erosion and siltation. Therefore, implementation of BMPs and compliance with the Construction General Permit, MS4 Permit, and the Sustainable Design Guidelines would not alter the existing drainage pattern of the site that would result in substantial erosion or siltation, and impacts would be less than significant.

Cumulative

Future growth associated with cumulative projects has the potential to increase erosion or siltation within individual cumulative Project sites or off-site. Each of the cumulative projects would be required to comply with the NPDES regulations and include a SWPPP with BMPs to control sediment and erosion on-site. With adherence to NPDES regulations that include a SWPPP with BMPs, the implementation of cumulative projects would result in less than significant on-site and off-site erosion or siltation and therefore, cumulative projects would result in less than significant cumulative impacts. Because the Proposed Project would also be required to adhere to NPDES regulations, the Proposed Project's contribution to cumulative on-site or off-site erosion or siltation would be less than cumulatively considerable.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project would have a less than significant impact related to erosion and siltation as a result of altering a stream or river, or the existing

drainage pattern. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in the severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Surface Run-off Causing Flooding

Impact 3.10-4: The Specific Plan Program and Proposed Project would result in a less than significant and less than cumulatively considerable impact from the alteration of the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in flooding on- or off-site.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Initial Study/Notice of Preparation and the Final PEIR identified that the Specific Plan Program area is not located in a flood zone and does not contain any streams or rivers. The Specific Plan Program components include the expansion or reconfiguration of existing urban development in mostly paved areas; therefore, the Specific Plan Program would maintain existing drainage patterns and would not increase runoff and flooding on or off-side. Therefore, impacts related to surface run-off causing flooding would be less than significant.

Cumulative

The Final PEIR did not address the cumulative impact from the alternation of the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in flooding on- or off-site because the Specific Plan Program area does not contain any streams or rivers. Therefore, the implementation of the Specific Plan Program would result in less than significant impacts associated with on- and off-site flooding.

Proposed Project Evaluation

Proposed Project-Specific

As with the Specific Plan Program, the Proposed Project is not located in a flood zone and does not contain any streams or rivers. As mentioned, the Proposed Project would increase the amount of impervious surfaces from approximately 39 percent to approximately 70 percent on the Project site. The proposed stormwater drainage system would retain stormwater on the site so that storm flows associated with a 25-year storm event would exit the Project site at the same rate as the existing storm flow from a 25-year storm event. Because the Proposed Project is not located within a flood zone and proposed drainage patterns and the rate of stormwater exiting the Project site would be similar to existing conditions, the Proposed Project impacts would be less than significant.

Cumulative

Future growth associated with cumulative projects has the potential to alter the existing drainage pattern of a site or area, including through the alteration of a course of a stream or river, or through the substantial increase in the rate or amount of surface runoff, which would result in flooding on- or off-site. Each of the cumulative projects would include a SWPPP with BMPs and required to comply with the County LID Standards Manual to control stormwater and prevent flooding. With adherence to these regulations, the implementation of cumulative projects would result in less than significant on-site and off-site flooding and therefore, cumulative project would result in less than significant cumulative impacts. Because the Proposed Project would also be required to adhere and implement a SWPPP and includes a stormwater drainage design that would not increase the rate of stormwater leaving the Project site under the Proposed Project compared to the flow rate under existing conditions, the Proposed Project's contribution to cumulative on- or off-site flooding would be less than cumulatively considerable.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project would have a less than significant impact related to flooding on- or -off-site as a result of altering a stream or river or the increase of impervious surfaces. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in the severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Storm Drainage Capacity and Polluted Run-off

Impact 3.10-5: The Specific Plan Program and Proposed Project would result in a less than significant and less than cumulatively considerable impact from the alteration of the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would not result in creating or contributing run-off water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted run-off which would result in flooding on- or off-site.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

As identified in the Final PEIR, storm drains within the Specific Plan Program area drain to different portions of Compton Creek. However, buildout within the Specific Plan Program area is expected to generate little or no increase in runoff to the existing drainage system because the majority of the area is developed and approximately 80 to 90 percent of the existing Specific Plan Program area is impervious. Development in accordance with the Specific Plan Program is not

expected to directly trigger any need for upgrades to the County's existing storm drain major backbone facilities, due to the Low Impact Development (LID) Ordinance requirements for percolation and on-site detention for new development, which would stabilize and/or even reduce runoff in the area. Therefore, the County does not recommend an upgrade of the existing storm drain system within the Specific Plan Program area. Impacts related to exceeding the capacity of existing and planned storm drains would be less than significant.

Additionally, the Specific Plan Program would not result in the generation of substantial sources of polluted runoff because development in accordance with the Specific Plan Program would be required to comply with NPDES requirements, County Stormwater Pollution Control Requirements for Construction Activities, and the requirements of the County LID Standards Manual. Therefore, the implementation of the Specific Plan Program would result in less than significant impacts related to the creation of polluted runoff.

Cumulative

The geographic scope for cumulative impacts related to stormwater drainage capacity and polluted runoff includes the drain facilities that are located downstream of the Specific Plan Program area. As cumulative development is implemented, compliance with the LID Ordinance requirements for percolation and on-site detention would be required. Compliance with these requirements would reduce the need for downstream drainage facility improvements. In addition, cumulative development would be required to comply with NPDES requirements, County Stormwater Pollution Control Requirements for Construction Activities, and the requirements of the County LID Standards Manual to reduce polluted runoff from cumulative development sites. Therefore, cumulative development would result in less than significant cumulative impacts on the capacities of existing or planned storm drains and on stormwater related to polluted runoff.

Because the Specific Plan Program would be required to implement the NPDES requirements, County Stormwater Pollution Control Requirements for Construction Activities, and the LID Ordinance requirements, the Specific Plan Program's contribution to cumulative impacts on the capacities of existing and planned storm drains and on stormwater related to polluted runoff would be less than cumulatively considerable.

Proposed Project Evaluation

Proposed Project-Specific

As with the Specific Plan Program, the Proposed Project drainage pattern would be similar to existing conditions with the Project's proposed stormwater facilities. These proposed facilities have been designed to comply with the County LID Ordinance requirements for percolation and on-site detention. The facilities would retain stormwater on the site so that storm flows associated with a 25-year storm event would exit the Project site at the same rate as the existing storm flow from a 25-year storm event. Therefore, implementation of the Proposed Project would not increase stormwater flow downstream of the Project site and would not exceed the capacity of existing storm drain facilities that would result in flooding on- or off-site. As a result, the implementation of the Proposed Project would result in less than impacts associated with downstream drainage capacities.

The Proposed Project would also not result in the generation of substantial sources of polluted runoff because the Proposed Project would be required to comply with NPDES requirements, County Stormwater Pollution Control Requirements for Construction Activities, and the requirements of the County LID Standards Manual. Therefore, the implementation of the Proposed Project would result in less than significant impacts related to the creation of polluted runoff.

Cumulative

The geographic scope for cumulative impacts related to stormwater drainage capacity and polluted runoff includes the drain facilities that are located downstream of the Project site. As cumulative development is implemented, compliance with the LID Ordinance requirements for percolation and on-site detention would be required. Compliance with these requirements would reduce the need for downstream drainage facility improvements. In addition, cumulative development would be required to comply with NPDES requirements, County Stormwater Pollution Control Requirements for Construction Activities, and the requirements of the County LID Standards Manual to reduce polluted runoff from cumulative development sites. Therefore, cumulative development would result in less than significant cumulative impacts on the capacities of existing or planned storm drains and on stormwater related to polluted runoff.

Because the Proposed Project would be required to implement the NPDES requirements, County Stormwater Pollution Control Requirements for Construction Activities, and the LID Ordinance requirements, the Proposed Project's contribution to cumulative impacts on the capacities of existing and planned storm drains and on stormwater related to polluted runoff would be less than cumulatively considerable.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project would have a less than significant impact related to exceeding capacity of existing storm drain systems and to polluted run-off. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in the severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Risk of Loss or Damage Involving Flooding

Impact 3.10-6: The Specific Plan Program and Proposed Project would not impact or contribute to a cumulative impact on existing housing or other insurable structures in a Federal 100-year flood hazard area or County Capital Flood floodplain from the alteration of the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would not impede or redirect flood flows that would expose existing housing or other structures to a risk of loss or damage involving flooding.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Initial Study/Notice of Preparation and Final PEIR identified that the Specific Plan Program area is not located within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map. Development in accordance with the Specific Plan Program is required to comply with the County's LID Ordinance requirements for percolation and on-site detention for new development so that there is no increase in the rate of stormwater flow from the Specific Plan Program area. Therefore, the implementation of the Specific Plan Program would not impede or redirect flood flows that would expose existing housing or other structures to a risk of loss or damage involving flooding.

Cumulative

The Final PEIR did not address the cumulative impact on existing housing or other structures because the Specific Plan Program area is not located within a Federal 100-year flood hazard area or County Capital Flood floodplain. In addition, development in accordance with the Specific Plan Program is required to comply with the County's LID Ordinance requirements for percolation and on-site detention for new development so that there is no increase in the rate of stormwater flow from the Specific Plan Program area. Therefore, the implementation of the Specific Plan Program would not impede or redirect flood flows that would expose existing housing or other structures to a risk of loss or damage involving flooding and would not contribute to cumulative impacts from loss or damage involving flooding.

Proposed Project Evaluation

Proposed Project-Specific

As with the Specific Plan Program, the Proposed Project is not located within a flood hazard zone and no rivers or streams are located within or adjacent to the Project site (FEMA, 2008). Therefore, the Proposed Project would have no impact on placing housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, or within a floodway or floodplain. In addition, the Proposed Project's stormwater facilities have been designed to comply with the County's LID Ordinance requirements for percolation and on-site detention so that there is no increase in the rate of stormwater flow from the Project site. Therefore, the Proposed Project would not impede or redirect flood flows that would expose existing housing or other structures to a risk of loss or damage involving flooding and would not cause impacts from loss or damage involving flooding.

Cumulative

As with the Specific Plan Program, the Proposed Project is not located within a flood hazard zone that would result in impacts on housing located within a 100-year flood hazard area, floodway, or floodplain. Therefore, the Proposed Project would not contribute to a cumulative considerable impact associated with loss or damage of structures involving flooding.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project would not impede or redirect flood flows that would expose existing housing or other structures to a risk of loss or damage involving flooding. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in the severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Structures Requiring Additional Flood Proofing or Flood Insurance

Impact 3.10-7: The Specific Plan Program and Proposed Project would not impact or contribute to a cumulative impact on structures being exposed to the Federal 100-year flood hazard or County Capital Floodplain areas because the Project site and surrounding area are not located in a flood hazard area and futures structures would not require additional flood proofing and flood insurance.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Initial Study/Notice of Preparation and Final PEIR identified that the Specific Plan Program is not located within a 100-year flood hazard area and therefore, development in accordance with the Specific Plan Program would result in no impacts related to placement of structures in a flood hazard area.

Cumulative

The Final PEIR did not address the cumulative impact on structures being exposed to the Federal 100-year flood hazard or County Capital Floodplain areas because the Project site and surrounding area are not located in a flood hazard area. Therefore, the Specific Plan Program would not contribute to cumulative flood hazard impacts.

Proposed Project Evaluation

Proposed Project-Specific

The Project site is not located within a flood hazard zone that would result in impacts on structures being exposed to the Federal 100-year flood hazard or County Capital Floodplain areas

because the Project site and surrounding area are not located within a flood hazard area (FEMA, 2008). Therefore, the Proposed Project would result in no flood hazard impacts.

Cumulative

As with the Specific Plan Program, the Proposed Project is not located within a flood hazard zone that would expose structures to the Federal 100-year flood hazard or County Capital Floodplain area. Therefore, the Proposed Project would not contribute to a cumulative impact associated with flood hazards.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project would have no impact related to exposing structures to the Federal 100-year flood hazard or County Capital Floodplain areas. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in the severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Los Angeles County Low Impact Development Ordinance

Impact 3.10-8: The Specific Plan Program and Proposed Project would not conflict with the Los Angeles County Low Impact Development Ordinance and therefore, the Specific Plan Program and the Proposed Project would result in no impact and would not contribute to cumulative impacts related to conflicts with the Los Angeles County Low Impact Development Ordinance.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Initial Study/Notice of Preparation and Final PEIR identified that the County LID Ordinance was designed to manage rainfall and stormwater runoff in urban areas through the distribution of small, cost-effective landscape features throughout the Specific Plan Program area. Such features include bio-retention/filtration landscape areas, reduced impervious surfaces, and functional landscaping and grading. The development projects implemented under the Specific Plan Program would develop and implement a Water Quality Management Plan (WQMP) as required by the NPDES MS4 permit that would incorporate structural and non-structural BMPs designated to reduce volume, velocity and pollutant loading of storm water and limit dry weather flows discharging from the Specific Plan Program area. The NPDES MS4 permit would also require implementation of LID practices to prevent non-storm water discharges and encourage proper filtration of runoff to reduce the degradation of water quality. Development within the Specific Plan Program area would comply with the Los Angeles County's LID Ordinance and would

incorporate BMPs that are consistent with the LID Ordinance. Therefore, The Specific Plan Program impacts regarding conflicts with the LID Ordinance would not occur.

Cumulative

The Final PEIR did not address the cumulative conflict with the Los Angeles County LID Ordinance because developments under the Specific Plan Program would be required to implement WQMPs as required by the NPDES MS4 Permit and include BMPs designed to reduce peak flows from individual sites. Therefore, the Specific Plan Program would not contribute to cumulative impacts associated with conflicts with the County's LID Ordinance.

Proposed Project Evaluation

Proposed Project-Specific

As with the Specific Plan Program, the Proposed Project would comply with the Los Angeles County LID Ordinance. Since the Proposed Project would increase the impervious surfaces on-site compared to existing conditions under the Specific Plan Program, the Proposed Project would have the potential to increase surface and stormwater runoff. However, the Proposed Project would implement stormwater facilities consistent with the County's LID Ordinance. The facilities would retain stormwater onsite through the use of storage tanks and drywells so that there is no increase in the rate of stormwater flow from the Project site. In addition, the Proposed Project includes CDS units to improve stormwater quality through screening, separating, and trapping debris, sediment, and hydrocarbons from stormwater runoff. The implementation of the proposed drainage facilities would not create impacts associated with conflicts with the County's LID Ordinance.

Cumulative

Cumulative development would be required to comply with the County LID Ordinance through the implementation of WQMPs as required by the NPDES MS4 Permit and include BMPs designed to reduce peak flows from individual sites. Therefore, the cumulative development would result in no impacts associated with conflicts with the County's LID Ordinance. Because the Proposed Project would comply with the County LID Ordinance by implementing stormwater facilities that would reduce stormwater runoff from the Project site and improve stormwater quality with the use of CDS units, the Proposed Project would result in no impacts and would not contribute to cumulative impacts associated with conflicts with the County's LID Ordinance.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project would not conflict with the Los Angeles LID Ordinance. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in the severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known

with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Wastewater Treatment Systems

Impact 3.10-9: The Specific Plan Program and Proposed Project does not include onsite wastewater treatment systems, and therefore, the Specific Plan Program and the Proposed Project would result in no impacts and would not contribute to cumulative impacts associated with onsite wastewater treatment systems.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Initial Study/Notice of Preparation and Final PEIR identified that wastewater produced in the Specific Plan Program area would be transported to the Joint Water Pollution Control Plant (JWPCP) located in the City of Carson. The JWPCP provides primary and secondary treatment for residents and businesses within the County of Los Angeles. The Specific Plan Program includes the continued collection and treatment of wastewater generated within the Specific Plan Program area at the JWPCP. Therefore, the Specific Plan Program would result in no impacts associated with onsite wastewater treatment systems.

Cumulative

The Final PEIR did not address the cumulative impact of on-site wastewater treatment systems within the Specific Plan Program area because the Specific Plan Program does not include wastewater treatment systems within the Specific Plan Program area. Therefore, the Specific Plan Program would not contribute to any cumulative impacts associated with onsite wastewater treatment systems.

Proposed Project Evaluation

Proposed Project-Specific

As with the Specific Plan Program, wastewater produced on the Project site would be transported to and treated at the JWPCP. The Proposed Project does not include wastewater treatment on the Project site. Therefore, the Proposed Project would result in no impacts associated with onsite wastewater treatment systems.

Cumulative

Wastewater generated by residents and businesses in the vicinity of the Project site and within the County of Los Angeles would be transported to and treated at the JWPCP. Therefore, cumulative development would not result in impacts associated with onsite wastewater treatment systems. Because the Proposed Project would not include onsite wastewater treatment systems, the Proposed Project would not contribute to cumulative impacts associated with onsite wastewater treatment systems.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project does not propose the use of on-site wastewater treatment systems, and therefore would not result in impacts associated with onsite wastewater treatment systems. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in the severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Risk of Pollutants Due to Inundation

Impact 3.10-10: The Specific Plan Program and Proposed Project would not be exposed to a flood hazard related to inundation by a tsunami, seiche, mudflow or risk release of pollutants and therefore, the Specific Plan Program and Proposed Project would not impact and would not contribute to cumulative impacts from the risk of the conveyance of pollutants due to inundation.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Initial Study/Notice of Preparation and Final PEIR stated that the Specific Plan Program area is not subject to inundation by tsunami as it is located approximately 13 miles east of the Pacific Ocean. Seiches occur in semi- or fully enclosed bodies of water when strong winds and/or rapid changes in atmospheric pressure push water from one end of the body of water to the other, resulting in an oscillation back and forth of waves. The dry, Mediterranean climate in the Specific Plan Program area is not prevalent to dramatic changes in pressure or strong winds such that a seiche would occur, bypassing holding walls and inundating the Specific Plan Program area. Mudflows are flowing masses of fine-grained earth material with a high degree of fluidity and happen on slopes. The Specific Plan Program area is developed, with a flat topography and does not have enough exposed soils or topography to be a risk of mudflow. Therefore, flood hazard impacts related to inundation by a tsunamic, seiche, or mudflow, or risk release of pollutants due to project inundation would not occur.

Cumulative

The Final PEIR did not address the cumulative impact on a flood hazard related to inundation by a tsunami, seiche, mudflow, or risk release of pollutants because the Specific Plan Program area is not located within an inundation zone. Therefore, the Specific Plan Program would not contribute to cumulative flood hazard risks or risks associated with the release of pollutants from inundation.

Proposed Project Evaluation

Proposed Project-Specific

As with the Specific Plan Program, the Proposed Project is not located within an inundation zone caused by a tsunami because the Project site is located more than 13 miles from the ocean. In addition, as with the Specific Plan Program, the Project site is located approximately 0.75-mile

northwest of the nearest lake which is located within Majic Johnson Park. Although a seiche is not expected to occur at the lake, if a seiche occurs, water that exits the lake would flow toward Compton Creek to the east and then eventually flows to the south downstream of the lake. Due to the distance from the Project site as well as the presence of the existing Compton Creek, the Project site would not be inundated by water from the lake. Furthermore, due to the relatively flat terrain in the vicinity of the Project site, inundation due to mudflow would not occur. Because flood hazards on the Project site from a tsunami, seiche and mudflows would not occur, there would be no risk of release of pollutants due to inundation from a tsunami, seiche and mudflows.

Cumulative

Cumulative projects in the Project area are not expected to be located within an inundation area. Therefore, the risk from the implementation of cumulative projects associated with release of pollutants due to Project inundation would not occur. Because the Proposed Project would result in no pollutants impacts related to inundation by a tsunami, seiche, or mudflow, the Proposed Project would not contribute to a cumulative pollutant impacts associated with inundation from a tsunami, seiche, or mudflow.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project would result in no pollutant impacts associated with inundation by a tsunami, seiche, or mudflow. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in the severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Water Quality Control Plan/Sustainable Groundwater Management Plan

Impact 3.10-11: The Specific Plan Program and Proposed Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, and therefore, the Specific Plan Program and Proposed Project would result in no impact and would not contribute to cumulative impacts associated with a water quality control plan or sustainable groundwater management plan.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Initial Study/Notice of Preparation and Final PEIR did not address the Water Quality Control Plan (WQCP) or Sustainable Groundwater Management Plan (SGMP) because the CEQA Environmental Checklist (Appendix G) in place at the time of the certification of the Final PEIR

did not include these issues to be specifically addressed in EIRs. Even though the Final PEIR did not address these plans, the Specific Plan Program would not conflict with either of them as discussed below.

The Specific Plan Program area is located within the Los Angeles Regional Water Quality Control Board Region. The plan is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. As discussed above, the Specific Plan Program compliance with all pertinent regulations, such as the Construction General Permit, County Stormwater Pollution Control Requirements for Construction Activities, and the County LID Standards Manual would decrease the potential for pollutants to enter receiving waters and degrade water quality. Additionally, the Specific Plan Program would implement the Sustainable Design Criteria which would further minimize pollutants being transported to downstream receiving waters. As a result, the implementation of the Specific Plan Program would not conflict with water quality policies within the WQCPs.

Second, the Project site is located within the Central Groundwater Basin. The purpose of the SGMPs is to avoid overdraft and balance levels of pumping and recharge. As discussed above, the Specific Plan Program would not reduce the groundwater recharge potential of the Specific Plan Program area due to the implementation of stormwater infiltration BMPs which would be technically feasible onsite and could increase the amount of groundwater recharge in the area. Therefore, the Specific Plan Program would not conflict with the SGMP policies to balance levels of pumping and recharge. Because the Specific Plan Program would comply with the WQCP and SGMP, the Specific Plan Program would have a less than significant impact.

Cumulative

The Final PEIR did not address the cumulative impacts related to conflicts with a WQCP or a SGMP. However, as discussed above, the Specific Plan Program would not conflict with either of these plans, and therefore, the Specific Plan Program would not contribute to potential cumulative impacts associated with the WQCP or SGMP.

Proposed Project Evaluation

Proposed Project-Specific

As with the Specific Plan Program, the Proposed Project is designed to reduce the potential for contamination of surface water and groundwater through its compliance with all pertinent regulations, such as the Construction General Permit, County Stormwater Pollution Control Requirements for Construction Activities, and the County LID Standards Manual. As a result, the implementation of the Proposed Project would not conflict with water quality policies within the WQCPs.

The implementation of the Proposed Project includes stormwater facilities consistent with the County's LID Ordinance. The facilities would retain stormwater onsite through the use of storage tanks and drywells so that there is no increase in the rate of stormwater flow from the Project site. In addition, the Proposed Project includes CDS units to improve stormwater quality through screening, separating, and trapping debris, sediment, and hydrocarbons from stormwater runoff.

The implementation of the proposed drainage facilities would not conflict with the SGMP policies to balance levels of pumping and recharge.

Cumulative

Because the Proposed Project would not conflict with either water quality policies of the WQCPs or the SGMP policies to balance levels of pumping and recharge, the Proposed Project would not contribute to potential cumulative impacts associated with the WQCP or SGMP.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project would have no impact related to a conflict with the WQCP or the SGMP. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in the severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

3.10.6 References

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3.11 Land Use and Planning

3.11.1 Introduction

This section addresses land use and planning related to dividing an established community, conflicting with land use plans, policies or regulations, and conflicting with general plan goals and policies related to Hillside Management Areas and Significant Ecological Areas. This section includes a brief summary of the environmental setting included in the Final PEIR, and the identification of any applicable changes to the land use plans, policies, or regulations that may have occurred since the certification of the Final PEIR. In addition, a brief summary of the regulatory setting included in the Final PEIR and any substantive revisions to the regulatory setting that has occurred since the certification of the Final PEIR. This section also includes the thresholds of significance and a brief summary of the land use and planning impacts and mitigation measures addressed in the Final PEIR as well as the potential significant environmental impacts associated with the Proposed Project. Finally, this section provides a conclusion of whether (1) the Proposed Project includes substantial changes that would require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact related to land use and planning; (2) substantial changes in the circumstances under which the Proposed Project is undertaken would require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact related to land use and planning; or (3) new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3) exist related to land use and planning.

3.11.2 Environmental Setting

The Specific Plan Program area and the Project site are located within the unincorporated Los Angeles County, within the community of Willowbrook approximately 10 miles south of downtown Los Angeles. The community is bounded by the cities of Los Angeles to the north, Hawthorne to the west, Lynwood to the east, Gardena to the southwest, and Compton to the southeast. Interstate 110 (I-110) defines the community's western boundary, and the Interstate 105 (I-105) is the northern boundary.

Specific Plan Program Area

The Specific Plan Program area encompasses 312 acres and is located within the northwestern portion of the Willowbrook community. The Specific Plan Program area encompasses parcels located south of Imperial Highway, north of East 122nd Street, east of Compton Avenue, and west of South Mona Boulevard. The Specific Plan Program includes various land uses including mixed use, medical, educational, commercial, residential, and open space.

Proposed Project Site

The Project site encompasses 12.8 acres within the northwestern portion of the Specific Plan Program and is bound by I-105 to the north, Compton Avenue to the west, East 118th Street to the

south and existing parking located approximately 550 feet west of Holmes. The portion of the Project site located north of East 117th Street (LACDA Property) encompasses approximately 1.3 acres. The portion of the Project site located south of East 117th Street (District Property) encompasses approximately 11.5 acres.

The Project site is designated Mixed-Use 2 (MU-2). The MU-2 zone is intended to provide commercial and residential development, with an emphasis on employment generating uses and residential infill development, such as an office or business park and residential mixed-use developments, with open space components and pedestrian connection to the Willowbrook/Rosa Parks Station, CDU and the MLK Medical Campus. Schools, including accessory facilities, associated with a college or university (i.e., CDU) are uses that are conditionally permitted within the MU-2 land use designation.

In addition, the Project site is located within a development area identified as Group Locations 3E and 3F within the Final PEIR. The amount of development evaluated in the Final PEIR for both locations is identified below.

- Group Locations 3E and 3F - 698 residential units and 473,927 square feet of non-residential uses (public uses that includes school facilities and commercial/office uses)

Group Location 3E encompasses the same area as the approximately 11.5-acre portion of the Project site located south of East 117th Street. Group Location 3F encompasses approximately 1.3 acres of the Project site located north of East 117th Street as well as approximately 1.67 acres located west of the Project site. The 1.67 acres includes four residential parcels that includes 102 residential units that were approved after approval of the Specific Plan and four residential units that existed on two other parcels prior to approval of the Specific Plan. Currently, there is no additional undeveloped land located on the portion of Group Location 3F that is west of the Project site.

Based on the development evaluated in the Final PEIR for Group Locations 3E and 3F and the current development within Group Location 3F west of the Project site (i.e., 106 residential units and no non-residential uses), the amount of development remaining evaluated in the Final PEIR without existing uses is identified below.

- Group Locations 3E and 3F – 592 residential units and 473,927 square feet of non-residential uses (public uses that includes school facilities and commercial/office uses)

3.11.3 Regulatory Setting

Regional

Southern California Association of Governments

SCAG is the designated Metropolitan Planning Organization (MPO) for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. As the designated MPO for the region, SCAG is mandated by the federal government to research and create plans for

transportation, growth management, hazardous waste management, and air quality. SCAG's major responsibilities include:

- Maintenance of a continuous, comprehensive, and coordinated planning process resulting in a Regional Transportation Plan (RTP) and a Regional Transportation Improvement Program (RTIP).
- Development of demographic projections plus the integrated land use, housing, employment, transportation programs, measures, and strategies portions of the South Coast Air Quality Management Plan (AQMP), as well as serving as co-lead agency for air quality planning for the Central Coast and Southeast Desert air basin districts.
- Responsibility under the federal Clean Air Act (CAA) for determining whether projects, plans, and programs conform to the CAA.
- To function as the authorized regional agency for intergovernmental review of programs proposed for federal financial assistance and direct development activities.
- Review of environmental impact reports for projects having regional significance for consistency with regional plans.
- To function as the authorized area-wide waste treatment management planning agency pursuant to federal water pollution control statutes.
- Responsibility under state law for preparation of the Regional Housing Needs Assessment (RHNA).

Because the Specific Plan Program and the Proposed Project are considered to be of regional significance, per CEQA Guidelines Sections 15125(d) and 15206, SCAG is responsible for ensuring that the project is consistent with the Regional Transportation Plan/Sustainable Communities Strategy.

2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal 2024)

Southern California Association of Governments (SCAG) is the designated regional planning agency for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. SCAG is a joint powers agency with responsibilities pertaining to regional issues. SCAG's mandated responsibilities include developing plans and policies with respect to the region's population growth, transportation programs, air quality, housing, land use, sustainability, and economic development.

Since the certification of the Specific Plan Final PEIR, SCAG's Regional Council adopted the 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (hereinafter referred to as Connect SoCal 2024) (SCAG, 2024) in April 2024. The Connect SoCal 2024 presents the transportation vision for the region through the buildout horizon year of 2050 and builds upon and expands land use and transportation strategies previously established to increase mobility options and achieve a more sustainable growth pattern. The Connect SoCal 2024 includes new initiatives related to land use, transportation, and technology to reach the State's greenhouse gas (GHG) reduction goals. The Connect SoCal 2024 also includes a forecasted development pattern that demonstrates how the region can sustainably accommodate needed housing. The Connect

SoCal 2024 includes goals that fall into four core categories: mobility, communities, environment, and economy.

The Connect SoCal 2024 goals and subgoals applicable to the Proposed Project are as follows:

Mobility: Build and maintain an integrated multimodal transportation network.

- Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions.
- Ensure that reliable, accessible, affordable and appealing travel options are readily available, while striving to enhance equity in the offerings in high-need communities.
- Support planning for people of all ages, abilities and backgrounds

Communities: Develop, connect and sustain communities that are livable and thriving.

- Create human-centered communities in urban, suburban and rural settings to increase mobility options and reduce travel distances.
- Produce and preserve diverse housing types in an effort to improve affordability, accessibility and opportunities for all households.

Environment: Create a healthy region for the people of today and tomorrow.

- Develop communities that are resilient and can mitigate, adapt to and respond to chronic and acute stresses and disruptions, such as climate change.
- Integrate the region's development pattern and transportation network to improve air quality, reduce greenhouse gas emissions and enable more sustainable use of energy and water.
- Conserve the region's resources.

Economy: Support a sustainable, efficient and productive regional economic environment that provides opportunities for all residents.

- Improve access to jobs and educational resources.
- Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air and quality of life for our communities.

Gateway Cities Council of Governments

The Gateway Cities COG is a California joint powers authority made up of 27 cities and the County of Los Angeles (three County supervisorial districts which cover the unincorporated communities within the subregion), formed for the purpose of providing a vehicle for members to voluntarily engage in regional and cooperative planning and coordination of government services for the collective benefit of the residents of Southeast Los Angeles County. The goal and intent of the COG are to foster voluntary cooperation among cities and the County in the areas of transportation, air quality, housing, and economic development.

The Gateway Cities Council of Governments (COG), and the County transportation commission (Los Angeles County Metropolitan Transportation Authority (LACMTA)) worked together to develop a subregional Sustainable Communities Strategy, which is the subregion's plan to improve overall mobility, reduce greenhouse gases (GHG) by 2020 and 2035 using transportation and land use strategies, and enhances the quality of life for the region's residents. These strategies include major transportation improvements as well as transit oriented improvements.

County of Los Angeles

Los Angeles County General Plan

The Los Angeles County General Plan was adopted in 2015 and portions of the General Plan have been updated since 2015. The General Plan provides the policy framework for how and where the unincorporated County will grow through the year 2035. The General Plan accommodates new housing and jobs within the unincorporated areas in anticipation of population growth in the County and the region.

The General Plan includes a Transit Oriented District Program (Program LU-2 in Chapter 16 General Plan Implementation Programs) that adds new TODs and expands existing TODs from a 0.25-mile radius to 0.50-mile radius from the transit stations. The General Plan states that TOD is well-suited for higher density housing and mixed uses in urban and suburban areas, with nodes commercial, employment, and civic activities, and identifies the proposed Specific Plan Program area as a Transit Oriented District. The objective of the Transit Oriented District Program is to prepare a TOD Specific Plan for each TOD in the County, with the goals of: (1) increase walking, bicycling, and transit ridership and reduce vehicle miles traveled (VMTs); (2) facilitate compact, mixed use development; (3) increase economic activity; (4) facilitate the public investment of infrastructure improvements; and 5) streamline the environmental review process for future infill development projects.

The General Plan policies related to the Specific Plan Program and Proposed Project are listed below.

Land Use Element

Policy LU 1.11: Require the intensity, density, and uses allowed in a new specific plan to be determined using the General Plan, including the Land Use Policy Map and Land Use Legend.

Policy LU 1.12: Require a General Plan amendment for any deviation from the intensities, densities, and uses allowed by the General Plan (to apply the appropriate designation from the General Plan Land Use Legend), unless allowances for flexibility are specified in the specific plan.

Policy LU 2.1: Ensure that all community-based plans are consistent with the General Plan.

Policy LU 2.7: Set priorities for Planning Area-specific issues, including transportation, housing, open space, and public safety as part of community-based planning efforts.

Policy LU 2.8: Coordinate with the Los Angeles County Department of Public Works and other infrastructure providers to analyze and assess infrastructure improvements that are necessary for plan implementation.

***Policy LU 4.1*:** Encourage infill development in urban and suburban areas on vacant, underutilized, and/or brownfield sites.

Policy LU 4.3: Encourage transit-oriented development in urban and suburban areas with the appropriate residential density along transit corridors and within station areas.

Policy LU 4.4: Encourage mixed use development along major commercial corridors in urban and suburban areas.

Policy LU 5.1: Encourage a mix of residential land use designations and development regulations that accommodate various densities, building types and styles.

Policy LU 5.2: Encourage a diversity of commercial and retail services, and public facilities at various scales to meet regional and local needs.

Policy LU 5.3: Support a mix of land uses that promote bicycling and walking and reduce VMTs.

Policy LU 5.4: Encourage community-serving uses, such as early care and education facilities, grocery stores, farmers markets, restaurants, and banks to locate near employment centers.

Policy LU 5.10: Encourage employment opportunities and housing to be developed in proximity to one another.

Policy LU 7.1: Reduce and mitigate the impacts of incompatible land uses, where feasible, using buffers, appropriate technology, building enclosure, and other design techniques.

Policy LU 9.2: Encourage patterns of development that promote physical activity.

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

Policy LU 10.4: Promote environmentally-sensitive and sustainable design.

Policy LU 10.5: Encourage the use of distinctive landscaping, signage and other features to define the unique character of districts, neighborhoods or communities, and engender community identity, pride and community interaction.

Policy LU 10.6: Encourage pedestrian activity through the following:

- Designing the main entrance of buildings to front the street;
- Incorporating landscaping features;
- Limiting masonry walls and parking lots along commercial corridors and other public spaces;
- Incorporating street furniture, signage, and public events and activities; and
- Using wayfinding strategies to highlight community points of interest.

Policy LU 10.7: Promote public spaces, such as plazas that enhance the pedestrian environment, and, where appropriate, continuity along commercial corridors with active transportation activities.

Policy LU 11.1: Encourage new development to employ sustainable energy practices, such as utilizing passive solar techniques and/or active solar technologies.

Policy LU 11.2: Support the design of developments that provide substantial tree canopy cover, and utilize light-colored paving materials and energy-efficient roofing materials to reduce the urban heat island effect.

Policy LU 11.3: Encourage development to optimize the solar orientation of buildings to maximize passive and active solar design techniques.

Housing Element

The Los Angeles County Housing Element 2021-2029 was adopted by the County Board of Supervisors on May 17, 2022.

Policy 1.4: Assist housing developers to identify and consolidate suitable sites for developing housing for acutely low, extremely low, very low, low, and moderate income households and those with special needs.

Policy 2.1: Support the development of housing for acutely low, extremely low, very low, low, and moderate income households and those with special needs near employment, transit, services, and other community amenities and facilities such as parks.

Policy 2.2: Encourage multifamily residential and mixed use developments along major commercial and transportation corridors.

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

Air Quality Element

Policy AQ 3.5: Encourage energy conservation in new development and municipal operations.

Policy AQ 3.6: Support rooftop solar facilities on new and existing buildings.

Conservation and Natural Resources Element

Policy C/NR 5.6: Minimize point and non-point source water pollution.

Policy C/NR 6.1: Support the LID philosophy, which incorporates distributed, post-construction parcel-level stormwater infiltration as part of new development.

Parks and Recreation Element

Policy P/R 1.2: Provide additional active and passive recreation opportunities based on a community's setting, and recreational needs and preferences.

Noise Element

Policy N 1.2: Reduce exposure to noise impacts by promoting land use compatibility.

Policy N 1.5: Ensure compliance with the jurisdictions of State Noise Insulation Standards (Title 24, California Code of Regulations and Chapter 35 of the Uniform Building Code), such as noise insulation of new multifamily dwellings constructed within the 60 dB (CNEL or Ldn) noise exposure contours.

Public Services and Facilities Element

Policy PS/F 1.2: Ensure that adequate services and facilities are provided in conjunction with development through phasing or other mechanisms.

Policy PS/F 2.1: Support water conservation measures.

Economic Development Element

Policy ED 1.1: Encourage a diverse mix of industries and services in each Planning Area.

Policy ED 2.4: Ensure high standards of development and encourage environmentally sustainable practices in economic development activities.

Policy ED 2.5: Encourage employment opportunities to be located in proximity to housing.

Policy ED 2.6: Encourage community-serving uses, such as child care centers and personal services, to be located in proximity to employment centers.

Policy ED 4.4: Incentivize infill development in urban and suburban areas that revitalizes underutilized commercial and industrial areas.

Los Angeles County Zoning Code

The Los Angeles County Zoning Code (Title 22 – Planning and Zoning – of the Los Angeles County Code) implements the Land Use Element of the General Plan and provides specific development and land use standards. The Willowbrook Transit-Oriented District Specific Plan includes the specific development and land use standards for the Project site. The land uses and standards within the Specific Plan provide compatible use of land, consistent with the needs of residential, commercial and industrial developments, and the public health, safety, welfare and general prosperity of residents.

3.11.4 Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines and the County of Los Angeles Environmental Checklist Form, the project could have a significant impact on land use and planning if it would:

- Physically divide an established community (see Impact 3.11-1 below).
- Cause a significant environmental impact due to a conflict with any County land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect (see Impact 3.11-2, below).
- Conflict with the goals and policies of the General Plan related to Hillside Management Areas or Significant Ecological Areas (see Impact 3.11-3, below).

3.11.5 Impact Analysis

Divide an Established Community

Impact 3.11-1: The Specific Plan Program and Proposed Project would result in no impact and would not contribute to a cumulative impact due to physically dividing an established community.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Final PEIR identified that the Specific Plan Program included transit-oriented development to ensure that future development within the Specific Plan Program area provides for a walkable neighborhood of integrated land uses that provide for housing, employment, educational, and retail uses near regional transit. The Specific Plan Program provides redevelopment and infill development that would result in higher density housing, employment opportunities, and mixed-use development. In addition, the Specific Plan Program improves pedestrian and bicycle routes and linkages throughout the Specific Plan Program area and to/from the Willowbrook/Rosa Parks Station. The Specific Plan Program integrates existing uses in the area, enhances mobility, and connectivity of land uses through implementation of mixed uses, resulting in a more physically connected community. Therefore, impacts related to physical division of an established community would not occur.

Cumulative

The cumulative study area for land use and planning includes the areas within the Willowbrook community and the areas that are adjacent to the Specific Plan Program area (such as those areas within the City of Los Angeles, City of Lynwood, and City of Compton). The cumulative projects would not result in physically dividing an established community because the cumulative projects would not result in the construction of physical barriers or obstacles to circulation that would restrict existing patterns of movement in the cumulative study area. Therefore, cumulative projects would result in a less than significant impact related to the physical division of an established community.

The development of the Specific Plan Program includes the development of a variety of uses including medical, educational, residential, and commercial, which are integrated into the community. The Specific Plan Program enhances mobility and connectivity of land uses through implementation of mixed uses, resulting in a more physically connected community, and impacts related to physical division of an established community would not occur. Therefore, the Specific Plan Program would not contribute to cumulative impacts associated with physically dividing an established community.

Proposed Project Evaluation

Proposed Project-Specific

The Proposed Project includes the redevelopment of the Project site that previously included school facilities. Currently, the above-ground buildings previously associated with the school uses have been removed, and the site is fenced to restrict access to the Project site. The Proposed

Project includes affordable housing without displacing any existing residential units or commercial uses. New student/faculty/staff housing, athletic facilities, and other support services are proposed to be located adjacent to the existing CDU campus with direct pedestrian access and connectivity promoting a pedestrian-oriented campus that serves CDU students and staff, as well as the larger community by providing ground-floor commercial and retail uses integrated into the development. The Proposed Project will also provide connectivity of the Project site with the surrounding community by allowing the community to schedule the use of the proposed athletic field and gym pursuant to an appropriate use agreement and subject to CDU's hours of operation. This will increase the potential recreational amenities to the public.

Additionally, a portion of E. 118th Street (approximately 700 linear feet) is proposed to be vacated and cars removed from the area between the existing campus and the Proposed Project. The vacated street will serve as a pedestrian promenade and provide a safe pedestrian experience between the existing campus and new development. The vacation of a portion of E. 118th Street would require vehicular traffic from west of the Project site to either travel north approximately 650 feet to E. 117th Street or south approximately 750 feet to E. 120th Street if the vehicular destination is east of the Project site. Vehicular traffic from east of the Project site along 118th Street would travel to Holmes Avenue that turns into E. 117th Street. These modifications to vehicular travel patterns would not represent a substantial division of the community since alternative routes are nearby.

The Proposed Project also includes community uses that would connect the surrounding community with the Project site. These community uses may include special events, such as a weekly farmer's market, book fair, health fair, and other community events. Overall, the Proposed Project uses would transform an existing fenced site that contains foundations of educational facilities into an extension of CDU and residential campus. This transformation of the Project site would expand the higher education experience for students without displacing access to other uses in the community and provide a more accessible Project site to the surrounding community. The proposed uses would not create a new physical barrier dividing an existing established community, and therefore, no impacts to an established community would occur with the implementation of the Proposed Project.

Cumulative

Cumulative projects in the vicinity of the Project site are located on individual parcels and would not result in physically dividing an established community. These cumulative projects would not result in the construction of physical barriers or obstacles to circulation that would restrict existing patterns of movement in the cumulative study area. Because the Proposed Project would not create a new physical barrier, the Proposed Project would not contribute to potential cumulative impacts associated with physically dividing an established community.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project would not result in an impact related to the physical division of an established community. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in the severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Conflict with Applicable Plans, Policies, or Regulations

Impact 3.11-2: The Specific Plan Program and Proposed Project would result in a less than significant and less than cumulatively considerable environmental impacts associated with existing County land use plans, policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

As identified in the Final PEIR, the Specific Plan Program would be consistent with the applicable SCAG and General Plan goals and policies that are intended to avoid or mitigate adverse environmental effects. In addition, although the Gateway Cities Council of Governments (COG) has developed its own Sustainable Communities Strategy, the COG does not propose its own set of goals and policies and instead relies on SCAG's goals and policies. As stated in the Final PEIR, the Specific Plan Program is consistent with SCAG goals and policies and therefore would be consistent with the Gateway Cities COG Sustainable Communities Strategy. As a result, impacts related to the project's consistency with applicable SCAG, Gateway Cities COG and County plans and policies would be less than significant.

SCAG RTP/SCS Policies

The Final PEIR identified that the Specific Plan Program would implement many of the SCAG policies related to high-density, infill development that is centered around public transit opportunities. The Specific Plan Program includes infill development in an already developed urban area that would make use of the existing circulation and utility infrastructure. The infill development includes high-density residential uses, educational, employment, and commercial uses to enhance the mixed-use environment in which residents benefit from nearby shopping and employment opportunities and would be within walking distance of the Willowbrook/Rosa Parks Station. The Final PEIR stated that the Specific Plan Program would be consistent with SCAG goals to increase transit-oriented development.

Los Angeles County General Plan

The Final PEIR identified that the Specific Plan Program would involve infill development and redevelopment of underutilized parcels within walking distance of the existing Willowbrook/Rosa Parks Station. The Specific Plan Program includes land uses to introduce additional mixed uses

and enhance the transit-oriented development pattern to the area. The mix of uses include commercial, retail, and public facilities that would meet both regional needs such as the medical, educational, and Metro uses as well as the local needs such as retail and restaurants for the residents, students, and employees within the Specific Plan Program area. The Specific Plan Program encourages patterns of development that promote physical activity and environmentally-sensitive and sustainable design. The Final PEIR identified that the Specific Plan Program is consistent with the General Plan policies.

Cumulative

The cumulative study area for land use and planning includes all areas within the Willowbrook community and the areas (such as the City of Los Angeles, City of Lynwood, and City of Compton areas) that are adjacent to the Specific Plan Program area. Future growth in the project vicinity is anticipated to be similar in character and intensity as existing development and proposed land uses under the Specific Plan Program. It is reasonable to assume that as future developments in the vicinity of the Specific Plan Program area are processed through the County as well as the adjacent cities, these future projects would be consistent with the policies within the applicable general plan or if policy revisions or general plan amendments are proposed, these potential changes and revisions would be reviewed to ensure potential environmental impacts would be less than significant. Therefore, cumulative developments would result in less than significant environmental impacts associated with consistency to the County's and surrounding cities' general plans and policies. Because the Specific Plan Program would be consistent with the County plans and policies, the Specific Plan Program's contribution to the potential cumulative impacts associated with consistency to existing general plans and policies would be less than cumulatively considerable, and therefore, less than cumulatively significant.

Proposed Project Evaluation

Proposed Project-Specific

SCAG RTP/SCS Policies

Development of the Proposed Project would implement many of the SCAG policies related to high-density, infill development that is centered around public transit opportunities. The Project site is located within 0.5 mile from the Willowbrook/Rosa Parks Metro Rail station that will promote the use of public transit, reduce vehicle miles traveled as well as reduce the generation of greenhouse gas emissions. The Proposed Project includes infill development in an area where existing school uses were abandoned and structures removed. The infill development will expand a vital community-oriented university and continue the provision of educational uses that are highly needed in the area.

The existing circulation and utility infrastructure are proposed to be used, and a portion of E. 118th Street is proposed to be vacated to serve as a pedestrian promenade and provide a safe pedestrian experience. The Proposed Project includes athletic facilities that are planned to be made available to the community for public use to the extent possible. These facilities would serve the residents and students at CDU and provide some additional recreational opportunities for the community at-large.

The proposed development includes high-density residential uses, educational, employment, and commercial uses to enhance the mixed-use environment in which residents benefit from nearby shopping and employment opportunities and would be within walking distance of the Willowbrook/Rosa Parks Station. The features of the Proposed Project would be consistent with SCAG goals to increase transit-oriented development. Therefore, the Proposed Project would result in less than significant impacts associated with applicable SCAG goals.

Los Angeles County General Plan

The plans and policies within the Los Angeles County General Plan involve infill development and redevelopment of underutilized parcels. The Proposed Project includes infill development in an area where existing school uses were abandoned and structures removed. The Proposed Project includes the provision of affordable housing for the Willowbrook Community. Smart growth principles will be promoted by placing the residential uses in close proximity to employment areas such as CDU and nearby Martin Luther King Medical Center. The Proposed Project will also promote a walkable community through the vacation of a portion of E. 118th Street to remove cars from the area so that a pedestrian promenade could be established and provide a safe pedestrian experience. Furthermore, the Proposed Project includes energy-efficient and sustainable design through the incorporation of a network of landscape pathways throughout the Project site with a substantial number of shade trees to reduce the heat island effect. The Proposed Project includes sustainable energy practices including the provision of solar facilities on top of the proposed parking structure.

The Los Angeles County General Plan includes Policy LU 7.1: Reduce and mitigate the impacts of incompatible land uses, where feasible, using buffers, appropriate technology, building enclosure, and other design techniques. Following is a land use compatibility discussion of each of the proposed amendments to the Specific Plan which is part of the Los Angeles County General Plan. These amendments include revisions to the heights of structures proposed on the Project site from 50 to 70 feet and allowing the proposed parking structure that is proposed adjacent to I-105 to be 110 feet above ground level. An additional modification to the Specific Plan design standards is the proposed zero-foot step back of the proposed Senior Affordable Housing building with frontage on Compton Avenue in lieu of a 10-foot step-back on the fourth floor. Furthermore, the Proposed Project would alter vehicular circulation with a proposed street vacation to terminate the public right-of-way for approximately 700 feet of E. 118th Street.

The proposed modification of the height limit for the three proposed Student Housing structures and one Faculty/Staff Housing structure would increase the allowed height from 50 feet to 70 feet. This increase in structure height would not result in land use compatibility issues resulting in significant environmental effects because these structures are proposed to be located within the internal portions of the Project site and not directly adjacent to existing residential uses.

The proposed modification of the height limit for the proposed Office building structure would be located adjacent to existing residential uses. The proposed modification would also increase the allowed height from 50 feet to 70 feet. Sections 3.1 and 3.13 included evaluations of shadow and noise impacts, respectively. Although the structure would be approximately 20 feet higher than

evaluated in the Final PEIR, Sections 3.1 and 3.13 determined that the land use compatibility issues of shadows and noise would be less than significant.

The proposed Parking Structure would result in shadows and create long-term noise from vehicular movements, engine noise, and vehicle doors opening and closing. Section 3.1 evaluated shadow impacts and determined that although shadows from the proposed parking structure would be substantial, the movement of shadows from east to north to west during the day would result in less than significant shadow impacts. Section 3.13 evaluated long-term noise levels from the parking structure and based on the proposed design of the parking structure that includes a solid wall along the west side of the parking structure for approximately 38 feet in height, long-term noise from the parking structure would be less than the existing ambient noise levels experienced by the existing residences. Land use compatibility impacts associated with shadows and noise would be less than significant.

The proposed Affordable Senior Housing would not be consistent with the set back requirement identified in the Specific Plan. This requirement is to set back the fourth floor of structures located along Compton Avenue by 10 feet. Given that the proposed Affordable Housing structure includes a minimum setback of 15 feet from the Compton Avenue right-of-way, the removal of this fourth floor set back would not create a substantive land use compatibility issue and would result in a less than significant impact.

Section 3.17 of this Addendum to Final PEIR included an evaluation of the proposed vacation of 700 linear feet of E. 118th Street to provide a pedestrian promenade. The evaluation discussed the consistency of the proposed vacation with various Los Angeles County plans. These plans included the Bicycle Master Plan, the Step by Step Pedestrian Plans, and Vision Zero. As discussed in Section 3.17, the Proposed Project would be consistent with each of these plans and would result in less than significant impacts.

In summary, the Proposed Project includes amendments and revisions to County plans. Based on the evaluations provided in this Addendum to Final PEIR, the Proposed Project would result in less than significant land use compatibility impacts. Therefore, the Proposed Project would result in less than significant impacts associated with applicable County plans and policies.

Los Angeles County Zoning

Subsequent to approval of the Willowbrook Transit-Oriented District Specific Plan Program, the Los Angeles County Zoning Code was modified to incorporate the plans, policies and regulations identified in the Specific Plan Program to guide future development within the Specific Plan Program area. The implementation of the Proposed Project would generally be consistent with the provisions within the Specific Plan Program. However, as discussed above, the Proposed Project includes amendments to design standards within the Specific Plan. As discussed above, the proposed amendments would result in less than significant land use compatibility impacts. Therefore, the Proposed Project would result in less than significant impacts associated with the Specific Plan Program.

Cumulative

The cumulative study area for land use and planning includes all areas that are in the vicinity of the Project site. Future growth in the project vicinity is anticipated to be similar in character and intensity as existing development. It is reasonable to assume that as future developments in the vicinity of the Project site are processed through the County, these future projects would be consistent with the policies within the County general plan or if policy revisions or general plan amendments are proposed, these potential changes and revisions would be reviewed to ensure potential environmental impacts would be less than significant. Therefore, cumulative developments would result in less than significant environmental impacts associated with consistency to the County's general plans and policies. Because the Proposed Project would result in less than significant impacts associated with the County plans and policies, the Proposed Project's contribution to the potential cumulative impacts associated with consistency to existing general plans and policies would be less than cumulatively considerable, and therefore, less than cumulatively significant.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project would have a less than significant impact associated with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in the severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Conflict with Hillside Management Areas or Significant Ecological Areas

Impact 3.11-3: The Specific Plan Program and Proposed Project would not result in impacts or contribute to a cumulative impact associated with Hillside Management Areas or Significant Ecological Areas

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Initial Study/Notice of Preparation and Final PEIR identified the Specific Plan Program area is within the urban and developed community of Willowbrook. The Specific Plan Program area is not located within any habitat conservation plan or natural community conservation plan. In addition, the Specific Plan Program area contains relatively flat terrain and there are no hillsides. Therefore, the implementation of the Specific Plan Program would result in no impacts associated with Hillside Management Areas and Significant Ecological Areas (SEAs).

Cumulative

The Final PEIR did not address the cumulative impact of a conflict with Hillside Management Areas or SEAs because the Specific Plan Program area is not located within Hillside Management Areas and SEAs. Therefore, the Specific Plan Program would not contribute to any cumulative impact associated with Hillside Management Areas and SEAs.

Proposed Project Evaluation

Proposed Project-Specific

As with the Specific Plan Program, the Project site contains relatively flat terrain and is not located within a Hillside Management Area (Los Angeles County, 2015a). Additionally, the Project site is located within an urbanized area of the Willowbrook community consisting of a mix of land uses such as residential, institutional, commercial, and public-right-of-way. The Proposed Project is not located within a SEA or natural community conservation plan (Los Angeles County, 2015b; CDFW, 2023). Therefore, the Proposed Project would result in no impact to Hillside Management Areas or SEAs.

Cumulative

Cumulative development in the vicinity of the Project site would not result in impacts to Hillside Management Areas or SEAs because the areas in the vicinity of the Project site contain relatively flat terrain and are not located within areas designated as Hillside Management Areas or SEAs. Because the Proposed Project is not located within Hillside Management Areas or SEAs, the Proposed Project would not contribute to impacts associated with Hillside Management Areas or SEAs.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project would not impact Hillside Management Areas or SEAs. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in the severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

3.11.6 References

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County of Los Angeles. 2015b. *Los Angeles County General Plan*. *Chapter 9: Conservation and Natural Resources Element, Figure 9.3- Significant Ecological Areas and Coastal Resource Areas Policy Map*. Available at: https://planning.lacounty.gov/wp-content/uploads/2022/11/9.1_Chapter9_Figures.pdf. Accessed on August 14, 2024.

SCAG. 2024. The Southern California Association of Governments' 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy – Connect SoCal. Available at: https://scag.ca.gov/sites/main/files/file-attachments/23-2987-connect-socal-2024-final-complete-040424.pdf?1714175547. Accessed on August 13, 2024.

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3.12 Mineral Resources

3.12.1 Introduction

This section addresses mineral resources and the Proposed Project's potential impacts related to loss in local and statewide mineral resource availability. This section includes a brief summary of the environmental setting included in the Final PEIR, and the identification of any applicable changes to the environmental setting that may have occurred since the certification of the Final PEIR. In addition, a summary of the applicable regulatory is provided. This section also includes the thresholds of significance and a brief summary of the mineral resource impacts and mitigation measures addressed in the Final PEIR as well as the potential mineral resource impacts associated with the Proposed Project. Finally, this section provides a conclusion of whether (1) the Proposed Project includes substantial changes that would require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact related to mineral resources; (2) substantial changes in the circumstances under which the Proposed Project is undertaken would require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact related to mineral resources; or (3) new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3) exist related to mineral resources.

3.12.2 Environmental Setting

Existing Land Use

Since the early 1920s, the Project site was developed with multiple residential structures and a school building in the western portion along Compton Avenue. By at least 1965, additional school buildings were constructed on the site. In 2002, structures on the site were removed. In 2020 as well as 2023, the remaining structures located on the Project site were removed. As identified in the Los Angeles County General Plan, the Specific Plan Program area as well as the Project site does not include mineral resources or oil and gas resources (Los Angeles County, 2015a). The nearest mineral resource zones are located approximately four miles north of the Project site. The nearest mineral and gas resources are located approximately two miles east of the Project site.

3.12.3 Regulatory Setting

State

California Geologic Energy Management Division

CalGEM is a State agency responsible for supervising the drilling, operation, maintenance, plugging, and abandonment of oil, gas, and geothermal wells. CalGEM's regulatory program promotes the wise development of oil, natural gas, and geothermal resources in California through sound engineering practices, prevention of pollution, and implementation of public safety programs. To implement this regulatory program, CalGEM requires avoidance of building over or

near plugged or abandoned oil and gas wells or requires the remediation of wells to current CalGEM standards.

Surface Mining and Reclamation Act of 1975

The Surface Mining and Reclamation Act of 1975 (SMARA) requires the State Geologist to classify land into Mineral Resource Zones (MRZs) according to its known or inferred mineral potential. The primary products are mineral land classification maps and reports. Local agencies are required to use the classification information when developing land-use plans and when making land-use decisions. The MRZ categories are defined as follows (CGS, 2000):

- **MRZ-1:** Areas where adequate geologic information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.
- **MRZ-2a:** Areas underlain by mineral deposits where geologic data indicate that significant measured or indicated resources are present. Areas classified MRZ-2a contain discovered mineral deposits that are either measured or indicated reserves. Land included in MRZ-2a is of prime importance because it contains known economic mineral deposits.
- **MRZ-2b:** Areas underlain by mineral deposits where geologic information indicates that significant inferred resources are present. Areas classified MRZ-2b contain inferred mineral resources as determined by their lateral extension from proven deposits or their similarity to proven deposits. Further exploration could result in upgrading areas classified MRZ-2b to MRZ-2a.
- **MRZ-3a:** Areas containing known mineral occurrences of undetermined economic significance. Further exploration could result in reclassification of all or part of these areas into the MRZ-2a or MRZ-2b categories.
- **MRZ-3b:** Areas containing inferred mineral occurrences of undetermined economic significance. Further exploration could result in the reclassification of all or part of these areas into the MRZ-2a or MRZ-2b categories.
- **MRZ-4:** Areas containing no known mineral occurrence.

Local

Following are the relevant policies from the Los Angeles County General Plan (County of Los Angeles, 2015a)

General Plan—Conservation and Natural Resources Element

Goal – C/NR 10: Locally available mineral resources to meet the needs of construction, transportation, and industry.

Policy C/NR10.1: Protect MRZ-2s and access to MRZ-2s from development and discourage incompatible adjacent land uses.

Goal – C/NR 11: Mineral extraction and production activities that are conducted in a manner that minimizes impacts to the environment.

Policy C/NR 11.1: Require mineral resource extraction and production activities and drilling for and production of oil and natural gas to comply with County regulations and state requirements, such as SMARA, and DOGGR regulations.

Policy C/NR 11.2: Require the reclamation of abandoned surface mines to productive second uses. Policy C/NR 11.3: Require appropriate levels of remediation for all publicly owned oil and natural gas production sites based on possible future uses.

Policy C/NR 11.4: Require that mineral resource extraction and production operations as well as activities related to the drilling for and production of oil and natural gas be conducted to protect other natural resources and prevent excessive grading in hillside areas.

Policy C/NR 11.5: Encourage and support efforts to increase the safety of oil and gas production and processing activities, including state regulations related to well stimulation techniques such as hydraulic fracturing or "fracking."

Goal – C/NR 12: Sustainable management of renewable and non-renewable energy resources.

Policy C/NR 12.1: Encourage the production and use of renewable energy resources.

Policy C/NR 12.2: Encourage the effective management of energy resources, such as ensuring adequate reserves to meet peak demands.

3.12.4 Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines and the County of Los Angeles Environmental Checklist Form, the project could have a significant impact on mineral resources if it would:

- Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state (see Impact 3.12-1, below).
- Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan (see Impact 3.12-2, below).

3.12.5 Impact Analysis

Known Mineral Resource

Impact 3.12-1: The Specific Plan Program and Proposed Project would result in no impact and would not contribute to a cumulative impact associated with the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Initial Study/Notice of Preparation and Final PEIR identified that no significant known mineral deposits have been identified within the Specific Plan Program area. As a result, the Specific Plan Program would not cause a loss of availability of a mineral that would be of value to the region and the residents of the state. No impacts to mineral resources would occur.

Cumulative

The Final PEIR did not address the cumulative impact to known mineral resources because no significant mineral deposits were identified within the Specific Plan Program area. Therefore, the Specific Plan Program would not contribute to the cumulative loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

Proposed Project Evaluation

Proposed Project-Specific

As with the Specific Plan Program area, the Project site does not contain any significant known mineral deposits. Therefore, the implementation of the Proposed Project would not cause a loss of availability of a known mineral that would be of value to the region and the residents of the state. Therefore, no impacts would occur.

Cumulative

Because the Project site does not contain any significant known mineral deposits that would result in the loss of availability of a known mineral resource that would be of a value to the region and the residents of the State, the Proposed Project would not contribute to any cumulative impact on a known mineral resource.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project would not impact mineral resources. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Locally-Important Mineral Resource Recovery Site

Impact 3.12-2: The Specific Plan Program and Proposed Project would result in no impact and would not contribute to a cumulative impact associated with the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Initial Study/Notice of Preparation and Final PEIR identified that no locally-important mineral recovery sites within the Specific Plan Program area are delineated within the County General Plan. Therefore, the implementation of the Specific Plan Program would not result in the loss of availability of a locally-important mineral resource recovery site.

Cumulative

The Final PEIR did not address the cumulative impact to a locally important mineral resource recovery site because the Specific Plan Program area does not contain locally-important mineral recovery sites. Therefore, the Specific Plan Program would not contribute to cumulative impacts to mineral recovery sites.

Proposed Project Evaluation

Proposed Project-Specific

As with the Specific Plan Program area, the Project site does not contain locally-important mineral recovery sites (Los Angeles County, 2015b). Therefore, no impacts would occur.

Cumulative

Because the Project site does not contain locally-important mineral recovery sites, the Proposed Project would not contribute to any impacts on locally-important mineral recovery sites. Therefore, the Specific Plan Program would not contribute to cumulative impacts to mineral recovery sites.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project would not impact locally-important mineral recovery sites. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

3.12.6 References

California State Mining and Geology Board. 2000. California Surface Mining and Reclamation Policies and Procedures, Special Publication 51. January. Available at: https://www.conservation.ca.gov/smgb/Guidelines/Documents/ClassDesig.pdf. Accessed on August 20, 2024.

Los Angeles County. 2015a. Los Angeles County General Plan, Conservation and Natural Resources Element. Available at: https://planning.lacounty.gov/wp-content/uploads/2022/11/9.0_gp_final-general-plan-ch9.pdf. Accessed on August 20, 2024.

Los Angeles County. 2015b. Los Angeles County General Plan, Conservation and Natural Resources Element, Figure 9.6, Mineral Resources. Available at: https://planning.lacounty.gov/wp-content/uploads/2022/11/9.1_Chapter9_Figures.pdf. Accessed on August 20, 2024.

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3.13 Noise and Vibration

3.13.1 Introduction

This section summarizes potential noise and vibration impacts associated with construction and operational activities of the Proposed Project. This section includes a brief summary of the environmental setting included in the Final PEIR, and the identification of any applicable changes to the noise and vibration setting that may have occurred since the certification of the Final PEIR. In addition, a brief summary of the regulatory setting and any substantive revisions to the regulatory setting that has occurred since the certification of the Final PEIR. This section also includes the thresholds of significance and a brief summary of the noise and vibration impacts and mitigation measures addressed in the Final PEIR as well as the potential noise and vibration impacts associated with the Proposed Project. Finally, this section provides a conclusion of whether (1) the Proposed Project includes substantial changes that would require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact related to noise and vibration; (2) substantial changes in the circumstances under which the Proposed Project is undertaken would require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact related to noise and vibration; or (3) new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3) exist related to noise and vibration.

An assessment of construction and operational noise and vibration associated with the Proposed Project was prepared by Environmental Science Associates and provided in this section. The construction noise evaluation focuses on noise generated from construction equipment. The operational noise evaluation focuses on traffic noise, noise from the proposed parking structure, onsite stationary noise such as heating, ventilation, and air conditioning units and onsite special events, and aircraft noise. The assessment is based on noise assumptions and modeling data located in Appendix H of this Addendum to Final PEIR.

3.13.2 Environmental Setting

Noise Principles and Descriptors

Noise is defined as unwanted sound. Sound becomes unwanted when it creates a nuisance that interferes with normal activities, or when it causes physical harm and adversely affects human health. The standard unit of measurement of the loudness of sound is the decibel (dB). The zero point on the dB scale is based on the lowest sound level that a healthy, unimpaired human ear can detect. Changes of 3 dB or fewer are only perceptible in laboratory environments. An increase of 10 dB represents a 10-fold increase in acoustic energy, while 20 dB is 100 times more intense, and 30 dB is 1,000 times more intense. Each 10-dB increase in sound level is perceived as approximately a doubling of loudness.[1]

[1] M David Egan, *Architectural Acoustics*, Chapter 1, March, 1988.

Numerous methods have been developed to measure sound over a period of time, including: Equivalent Sound Level (L_{eq}) and Maximum Noise event (L_{max}). Noise level can vary depending on the noise source and duration. Below are descriptions of the units of measure used in this analysis to describe the noise environment.[2]

- L_{eq}: Time variations in noise exposure are typically expressed as a statistical description of the sound pressure level that is exceeded over some fraction of a given observation period (called L_{eq}). For example, the noise levels exceeded on 10 percent of readings is called L_{10}, the median (50th percentile) reading is called L_{50}, etc.
- L_{max}: The maximum noise level recorded during a noise event is typically expressed as L_{max}.
- L_x: The noise level exceeded a percentage of a specified time period. For instance, L_{50} represents the noise level that is exceeded 50 percent of the time.
- CNEL: The Community Noise Equivalent Level (CNEL) is the time average A-weighted noise level during a 24-hour day that includes an addition of 5 dBA to measured noise levels between the hours of 7:00 pm to 10:00 pm and an addition of 10 dBA to noise levels between the hours of 10:00 pm to 7:00 am the next day to account for noise sensitivity in the evening and nighttime, respectively.

The attenuation of sound is highly dependent on the conditions of the land between the noise source and receiver. To account for this ground-effect attenuation (absorption), two types of site conditions are commonly used in noise models, soft-site and hard-site conditions. Soft-site conditions account for the sound propagation loss over natural surfaces such as normal earth and ground vegetation. For point sources, a drop-off rate of 7.5 dBA/ for each doubling of distance from the point source is typically observed over soft ground with landscaping, as compared with a 6.0 dBA for each doubling of distance over hard ground such as asphalt, concrete, stone and very hard packed earth. [3] This section addresses current noise and vibration conditions and the potential of the Proposed Project to result in impacts associated with substantial temporary or permanent increases in ambient noise levels in excess of existing standards and excessive vibration.

Existing Conditions

The Project site is bound by I-105 to the north, E. 118th Street to the south. Residential neighborhoods are located west of Compton Avenue with the nearest residential property in relation to the Project site is located immediately to the west of the Project site. Medical and institutional uses are located to the south across E. 118th Street from the Project site. At approximately 70 feet from the nearest point of the Project site is I-105. Existing noise sensitive uses in the vicinity of the Project site include the following:

- Multi-Family Residential Uses: Located to the north of E. 117th Street, south of E. 117th Street adjacent to the Project site, north of 117th Place, south of E. 118th Street, and west of Compton Avenue.

2 California Department of Transportation, *Technical Noise Supplement* (TeNS), Section 2.2.2.2, September, 2013.

3 California Department of Transportation, *Technical Noise Supplement* (TeNS), Section 2.1.4.2, September 2013.

- Single-Family Residential Uses: Located north of E. 117th Place, adjacent to the western boundary of the Project site and west of Compton Avenue.

Ambient Noise Levels

The predominant existing source of ambient noise in the Project site vicinity is roadway noise along E. 120th Street, Compton Avenue, and Wilmington Avenue, and other major roadways in the surrounding area. Additionally, the Interstate 105 (I-105), located approximately 70 feet north of the Project site's northernmost boundary contributes to ambient noise levels. Other noise sources include general residential and commercial-related activities associated with trash collection activities, loading and unloading activities, and surface parking lots.

Six off-site noise-sensitive receptor locations were identified to represent noise-sensitive uses within the Proposed Project area. The locations of the noise-sensitive receptors are shown in **Figure 3.13-1**, *Noise Sensitive Receptor Locations*, are also listed in **Table 3.13-1,** *Summary of Ambient Noise Measurements at Noise Sensitive Receptors*, as Receptor Location 1 through 6. Ambient noise levels were conducted at a total of six (6) locations (R1 through R6 on Figure 3.13-1). The measured environmental noise levels at R1 through R6 represent the current ambient noise levels in the vicinity of the Project site and are used to establish the existing ambient noise level at the noise-sensitive receptors within the Proposed Project area.

TABLE 3.13-1
SUMMARY OF AMBIENT SHORT-TERM NOISE MEASUREMENTS

Location, Duration, and Date of Measurements	Lmax	L_{50}
R1, Receptors north and west of the Project site along E. 117th Street	73.5	59.5
R2, Receptors south and east of the Project site along E. 117th Street	72.5	59.2
R3, Receptors south of the Project site along E. 118th Street	80.5	55.9
R4, Receptors west of the Project site along Compton Avenue	90.2	65.5
R5: Receptors west of the Project site along E. 117th Place	67.4	53.0
R6, Receptors east of the Project site along E. 118th Street	68.4	57.4

NOTE:

The ambient noise measurements were conducted using the Larson-Davis Soundtrack LxT1 Precision Integrated Sound Level Meter, which is a Type 1 standard instrument as defined in the American National Standard Institute S1.4. All instruments were calibrated and operated according to the applicable manufacturer specifications. The microphone was placed at a height of 5 feet above the local grade at the following locations.

SOURCE: ESA 2025

Existing Roadway Noise Levels

Existing roadway CNEL noise levels were calculated for ten roadway segments located in the vicinity of the Project site. The roadway segments selected for analysis are considered to be those that are expected to be most directly impacted by Proposed Project-related traffic, which, for the purpose of this analysis, includes the roadways that are located near and immediately adjacent to the Project site. These roadways, when compared to roadways located farther away from the Project site, would experience the greatest percentage increase in traffic generated by the Proposed Project (as distances are increased from the Project site, traffic is spread out over a greater geographic area, and its effects are reduced).

Exhibit F



SOURCE: ESA, 2025

CDU Wellness and Education Campus

Figure 3.13-1
Noise Measurement Locations

ESA

Existing roadway CNEL noise levels were calculated using the Federal Highway Administration's (FHWA's) Highway Traffic Noise Model (FHWA-TNM) and traffic volumes at the study intersections reported in the Transportation Impact Analysis for the Proposed Project prepared by Raju Associates (see Appendix I of this Addendum to Final PEIR) The model calculates the average noise level at specific locations based on traffic volumes, average speeds, and site environmental conditions.

The noise levels along these roadway segments are presented in **Table 3.13-2,** *Existing Vehicular Traffic Noise Levels*. As shown, the noise environment of the Proposed Project vicinity can be characterized by 24-hour CNEL levels attributable to existing traffic on local roadways. The calculated CNEL (at a distance of 30 feet from the outermost travel lane) from actual existing traffic volumes on the analyzed roadway segments ranged from 54.1 dBA along E. 117th Place east and west of Compton Avenue to 73.8 dBA along Imperial Highway west of I-105 westbound (WB) Ramps.

TABLE 3.13-2
EXISTING VEHICULAR TRAFFIC NOISE LEVELS

		CNEL (dBA) at Referenced Distances from Roadway[a]
Roadway Segment	**Land Use**	**Existing**
117th Place e/o Compton Avenue	Residential/Commercial	54.1
117th Place w/o Compton Avenue	Residential/Commercial	54.1
117th Street between Compton Avenue and Holmes Avenue	Residential/Commercial	60.7
117th Street w/o Compton Avenue	Residential/Commercial	60.7
118th Street between Holmes Avenue and Wilmington Avenue	Residential/Commercial	65.7
118th Street e/o Compton Avenue	Residential/Commercial	61.6
118th Street e/o Wilmington Avenue	Residential/Commercial	61.2
118th Street w/o Compton Avenue	Residential/Commercial	61.6
118th Street w/o Holmes Avenue	Residential/Commercial	58.7
119th Street/120th Street e/o Wilmington Avenue	Residential/Commercial	63.4
120th Street between Compton Avenue and Healthy Way	Residential/Commercial	63.3
120th Street between Healthy Way and Wilmington Avenue	Residential/Commercial	66.6
120th Street w/o Compton Avenue	Residential/Commercial	65.7
I-105 EB Ramps w/o Wilmington Avenue	Residential/Commercial	72.2
Imperial Highway between Compton Avenue and Wilmington Avenue	Residential	72.8
Imperial Highway between Wilmington Avenue and I-105 WB Ramps	Residential/Commercial	60.4
Imperial Highway e/o I-105 WB Ramps	Residential/Commercial	73.8
Imperial Highway w/o Compton Avenue	Residential/Commercial	72.9
Compton Avenue between 117th Place and 118th Street	Residential/Commercial	65.2
Compton Avenue between 117th Street and 117th Place	Residential/Commercial	65.2
Compton Avenue between 118th Street and 120th Street	Residential/Commercial	65.3
Compton Avenue between Imperial Highway and 117th Street	Residential/Commercial	62.7
Compton Avenue n/o Imperial Highway	Residential/Commercial	65.3
Compton Avenue s/o 120th Street	Residential/Commercial	64.2

		CNEL (dBA) at Referenced Distances from Roadway[a]
Roadway Segment	**Land Use**	**Existing**
Healthy Way s/o 120th Street	Residential/Commercial	58.8
I-105 WB Ramps n/o Imperial Highway	Residential/Commercial	61.9
Wilmington Avenue between Imperial Highway and I-105 EB Ramps	Residential/Commercial	68.3
Wilmington Avenue n/o Imperial Highway	Residential/Commercial	66.4
Wilmington Avenue s/o 119th Street/120th Street	Residential/Commercial	66.5

NOTES: Differences may not add up due to rounding.

a. Traffic noise is estimated at a distance of 30 feet from roadway.
b. Differences may not add up due to rounding.

SOURCE: ESA 2024; Raju Associates 2024

3.13.3 Regulatory Setting

Federal Level

Federal Transit Authority Vibration Standards

The Federal Transit Authority (FTA) has adopted vibration standards that are used to evaluate potential building damage impacts related to construction activities. The vibration damage criteria adopted by the FTA are shown in **Table 3.13-3,** *Construction Vibration Damage Criteria*.

TABLE 3.13-3
CONSTRUCTION VIBRATION DAMAGE CRITERIA

Building Category	PPV (inch/sec)	Approximate L_V[a]
Reinforced-concrete, steel or timber (no plaster)	0.50	102
Engineered concrete and masonry (no plaster)	0.30	98
Non-engineered timber and masonry buildings	0.20	94
Buildings extremely susceptible to vibration damage	0.12	90

NOTES:

PPV = peak particle velocity; LV = velocity in decibels; inch/sec = inches per second

a. Root-mean-square velocity in decibels (VdB) re 1 microinch per second.

SOURCE: FTA 2018, *Table 7-5*

In addition, the FTA has also adopted standards associated with human annoyance for groundborne vibration impacts for the following three land-use categories: Vibration Category 1- High Sensitivity, Vibration Category 2 - Residential, and Vibration Category 3 - Institutional. The FTA defines Category 1 as buildings where vibration would interfere with operations within the building, including vibration-sensitive research and manufacturing facilities, hospitals with vibration-sensitive equipment, and university research operations. Vibration-sensitive equipment includes, but is not limited to, electron microscopes, high-resolution lithographic equipment, and normal optical microscopes. Category 2 refers to all residential land uses and any buildings where people sleep, such as hotels and hospitals. Category 3 refers to institutional land uses such as

schools, churches, other institutions, and quiet offices that do not have vibration-sensitive equipment but still have the potential for activity interference.

Under conditions where there are an infrequent number of events per day, the FTA has established thresholds of 65 VdB for Category 1 buildings, 80 VdB for Category 2 buildings, and 83 VdB for Category 3 buildings. Under conditions where there are an occasional number of events per day, the FTA has established thresholds of 65 VdB for Category 1 buildings, 75 VdB for Category 2 buildings, and 78 VdB for Category 3 buildings. No vibration thresholds have been adopted or recommended for commercial and office uses. "Infrequent events" is defined by the FTA as being fewer than 30 vibration events of the same kind per day. "Occasional events" is defined by the FTA as between 30 and 70 vibration events of the same source per day.

State Level

California Noise Standards

The State of California does not have statewide standards for environmental noise, but the California Department of Health Services (DHS) has established guidelines for evaluating the compatibility of various land uses as a function of community noise exposure. These guidelines have been adopted by the County of Los Angeles within the County's Noise Element, as discussed below. The purpose of these guidelines is to maintain acceptable noise levels in a community setting for different land use types. Noise compatibility by different land use types is categorized into four general levels: "normally acceptable," "conditionally acceptable," "normally unacceptable," and "clearly unacceptable." For instance, a long-term noise environment ranging from 50 dBA CNEL to 65 dBA CNEL is considered to be "normally acceptable" for multi-family residential uses, while a noise environment of 75 dBA CNEL or above for multi-family residential uses is considered to be "clearly unacceptable." In addition, California Government Code Section 65302(f) requires each county and city in the State to prepare and adopt a comprehensive long-range general plan for its physical development, with Section 65302(g) requiring a noise element to be included in the general plan. The noise element must: (1) identify and appraise noise problems in the community; (2) recognize Office of Noise Control guidelines; and (3) analyze and quantify current and projected noise levels.

Local Level

County of Los Angeles General Plan Noise Element

The Los Angeles County (County) General Plan Noise Element was established as a planning tool to develop strategies and action programs that address the multitude of noise sources and issues throughout the County. The County's Noise Element primarily addresses transportation noise sources, such as traffic, railroad, and aircraft noise. The guidelines used by the County are based on the community noise compatibility guidelines established by the California DHS and are provided in **Table 3.13-4,** *Land Use Compatibility for Community Noise Exposure*. Specific regulations that implement these guidelines are set forth in the Los Angeles County Code (LACC), as discussed below.

TABLE 3.13-4
LAND USE COMPATIBILITY FOR COMMUNITY NOISE EXPOSURE

Land Use	Community Noise Exposure CNEL, dBA			
	Normally Acceptable[a]	Conditionally Acceptable[b]	Normally Unacceptable[c]	Clearly Unacceptable[d]
Residential: Low-Density Single-Family, Duplex, Mobile Homes	50 to 60	55 to 70	70 to 75	Above 75
Residential: Multi-Family	50 to 65	60 to 70	70 to 75	Above 75
Transient Lodging: Motels, Hotels	50 to 65	60 to 70	70 to 80	Above 80
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 to 70	60 to 70	70 to 80	Above 80
Auditoriums, Concert Halls, Amphitheaters	—	50 to 70	—	Above 65
Sports Arena, Outdoor Spectator Sports	—	50 to 75	—	Above 70
Playgrounds, Neighborhood Parks	50 to 70	—	67 to 75	Above 72
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 to 75	—	70 to 80	Above 80
Office Buildings, Business and Professional Commercial	50 to 70	67 to 77	Above 75	—
Industrial, Manufacturing, Utilities, Agriculture	50 to 75	70 to 80	Above 75	—

NOTES:

a. Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.
b. Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.
c. Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.
d. Clearly Unacceptable: New construction or development should generally not be undertaken.

SOURCE: Office of Planning and Research, 2017

With respect to these standards, changes in noise levels of less than 3 dBA are generally not discernible to most people, while changes greater than 5 dBA are readily noticeable and would be considered a significant increase. Therefore, the significance threshold for mobile source noise is based on human perceptibility to changes in noise levels (increases), with consideration of existing ambient noise conditions and the County's land use noise compatibility guidelines.

County of Los Angeles Noise Ordinance

The County of Los Angeles Noise Ordinance (Section 12.08.010, et seq., of the LACC identifies exterior noise standards for any source of sound at any location within the unincorporated areas of the County, and specific noise restrictions, exemptions, and variances for exterior noise sources. Several of the ordinance requirements are applicable to aspects of the project and are discussed below.

The County Noise Ordinance provides maximum operational exterior noise level standards for four general noise zones and establishes maximum exterior noise levels for each zone. These noise zones are:

I. Noise-Sensitive Zone —Noise-sensitive zones are designated by the County Health Officer.

II. Residential Properties—includes all types of residential developments and properties subject to residential zoning.

III. Commercial Properties—includes all types of commercial developments and also includes properties subject to commercial zoning classifications.

IV. Industrial Properties—includes all properties developed with manufacturing uses and industrial zoning.

For each of these zones, the County Noise Ordinance states that exterior operational noise levels caused by project-related on-site fixed sources (i.e., point noise sources) shall not exceed the levels identified in **Table 3.13-5**, *County of Los Angeles Exterior Noise Standards*, or the ambient noise level, whichever is greater, when the ambient noise level is determined without the noise source operating.

TABLE 3.13-5
COUNTY OF LOS ANGELES EXTERIOR NOISE STANDARDS

Noise Zone	Designated Noise Zone Land Use (Receptor property)	Time Interval	Exterior Noise Level dBA
I	Noise-sensitive area	Anytime	45
II	Residential Properties	10 p.m. to 7 a.m. (nighttime)	45
		7 a.m. to 10 p.m. (daytime)	50
III	Commercial Properties	10 p.m. to 7 a.m. (nighttime)	55
		7 a.m. to 10 p.m. (daytime)	60
IV	Industrial Properties	Anytime	70

SOURCE: County of Los Angeles Ordinance, No. 11743, Section 12.08.390

Further, the County Noise Ordinance establishes the following operational standards based on the duration of the noise-generating activity:

- Standard No. 1 shall be the exterior noise level which may not be exceeded for a cumulative period of more than 30 minutes in any hour.
- Standard No. 1 shall be the applicable noise level; or, if the ambient L_{50} exceeds the forgoing level, then the ambient L_{50} becomes the exterior noise level for Standard No. 1.
- Standard No. 2 shall be the exterior noise level which may not be exceeded for a cumulative period of more than 15 minutes in any hour.

- Standard No. 2 shall be the applicable noise level from Standard 1 plus 5 dB(A); or, if the ambient L25 exceeds the forgoing level, then the ambient L25 becomes the exterior noise level for Standard No. 2.
- Standard No. 3 shall be the exterior noise level which may not be exceeded for a cumulative period of more than five minutes in any hour.
- Standard No. 3 shall be the applicable noise level from Standard 1 plus 10 dB(A); or, if the ambient L8.3 exceeds the forgoing level, then the ambient L8.3 becomes the exterior noise level for Standard No. 3.
- Standard No. 4 shall be the exterior noise level which may not be exceeded for a cumulative period of more than one minute in any hour.
- Standard No. 4 shall be the applicable noise level from Standard 1 plus 15 dB(A); or, if the ambient L1.7 exceeds the forgoing level, then the ambient L1.7 becomes the exterior noise level for Standard No. 4.
- Standard No. 5 shall be the exterior noise level which may not be exceeded for any period of time. Standard No. 5 shall be the applicable noise level from Standard 1 plus 20 dB(A); or, if the ambient L0 exceeds the forgoing level, then the ambient L0 becomes the exterior noise level for Standard No. 4.

Thus, the louder the noise, the shorter the duration that such noise can last. To define these specific durations of noise, the noise metrics used include L_{50}, L_{25}, $L_{8.3}$, $L_{1.7}$, and L_{max}. These metrics are based upon a 1-hour timeframe which correspond to exceedance occurring 50, 25, 8.3, and 1.7 percent of the time, and the maximum sound level during that time period, respectively. However, these operational noise regulations are not applicable to construction noise, motor vehicle noise, air conditioners, or refuse collection. (LACC 12.08.570[D] and [I]).

The LACC also regulates noise levels from HVAC equipment. According to LACC Section 12.08.530 – *Residential Air Conditioning or Refrigeration Equipment*, it is prohibited to operate or permit the operation of such equipment if it exceeds the following sound levels:

1. At any point on a neighboring property line, measured 5 feet above grade level and at least 3 feet from any wall – 55 dBA or higher.

2. At the center of a neighboring patio area, measured 5 feet above grade level and at least 3 feet from any wall – 50 dBA or higher.

3. Outside the nearest living area window of the neighboring residence, measured no more than 3 feet from the window opening and at least 3 feet from any other surface – 50 dBA or higher.

The County Noise Ordinance also identifies specific restrictions regarding construction noise. Pursuant to the County Noise Ordinance, the operation of equipment used in construction, drilling, repair, alteration or demolition work is prohibited between the hours of 7:00 p.m. and 7:00 a.m. Monday through Friday, before 8:00 a.m. or after 6:00 p.m. on Saturday, and anytime on Sundays or legal holidays if such noise would create a noise disturbance across a residential or commercial property line (LACC, Section 12.08.440).The County Noise Ordinance further states the contractor must conduct construction activities in such a manner that the maximum noise

levels at the affected buildings will not exceed those listed in **Table 3.13-6,** *Los Angeles County Permissible Construction Equipment Noise at Receptor*. All mobile and stationary internal-combustion-powered equipment and machinery are also required to be equipped with suitable exhaust and air-intake silencers in proper working order. The County Code also allows for the issuance of noise variances if the activity, operation or noise source cannot feasibly be done in a manner that would comply with the provisions of this chapter, and no other reasonable alternative is available to the applicant (LACC Section 12.08.580[A][2]).

TABLE 3.13-6
LOS ANGELES COUNTY PERMISSIBLE CONSTRUCTION EQUIPMENT NOISE AT RECEPTOR

Equipment Type	Receptor Type	Daytime Hours	Nighttime Hours
Mobile Construction Equipment (Short-term operation - less than 10 days)			
	Single-family Residential	75	60
	Multi-family Residential	80	64
	Semi-residential/Commercial	85	70
	Business Structures	85	85
Stationary Construction Equipment (Long-term operation – 10 days or more)			
	Single-family Residential	60	50
	Multi-family Residential	65	55
	Semi-residential/Commercial	70	60

SOURCE: Los Angeles County Code, Section 12.08.440

The County Noise Ordinance Section 12.08.350 provides a presumed perception threshold of 0.01 inches-per-second (in/sec) RMS. The vibration level of 0.01 in/sec RMS is equivalent to 0.04 in/sec PPV.

3.13.4 Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines and the County of Los Angeles Environmental Checklist Form, the Proposed Project could have a significant noise or ground-borne vibration impact if it would:

- Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Proposed Project in excess of standards established in the County General Plan or noise ordinance (LACC, Title 12, Chapter 12.08), or applicable standards of other agencies (See Impact 3.13-1 below).
- Generation of excessive ground-borne vibration or ground-borne noise levels (See Impact 3.13-2 below).
- For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels (See Impact 3.13-3).

3.13.5 Impact Analysis

Exceedance of Established Noise Standards

Impact 3.12-1: The Specific Plan Program could have significant and cumulatively considerable effects from the generation of substantial temporary or permanent increases in ambient noise levels in the vicinity of the Specific Plan Program area due to the levels being in excess of standards established in the County General Plan or noise ordinance (Los Angeles County Code, Title 12, Chapter 12.08), or applicable standards of other agencies.

The Proposed Project would have less than significant and less than cumulatively considerable effects from the generation of substantial temporary or permanent increases in ambient noise levels in the vicinity of the Proposed Project.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Final PEIR in Section 3.9.5 on pages 3.9-22 through 3.9-24 identified that the Specific Plan Program would have a less than significant impact on construction noise because regardless of the noise levels emitted from individual development projects that are part of the Program, impacts would be subject to fully enforceable noise regulations from LACC Sections 12.08.010, et seq. which require the thresholds be met (e.g. through suitable mufflers and other noise attenuation features). The Final PEIR identifies the amount of development associated with buildout of the Specific Plan Program. Section 3.9 of the Final PEIR evaluates the potential construction impacts associated with buildout of the Specific Plan Program. The noise analysis describes various construction phases associated with development within the Specific Plan Program area such as demolition, grading/excavation, building construction and asphalt paving. The analysis also discloses and explains that although construction noise is typically short term, it can be "a significant source of noise" particularly near sensitive land uses. The Final PEIR discloses typical construction noise levels associated with project construction phases and describes the concept of noise attenuation. The Final PEIR also shows the typical noise levels from specific construction equipment expected to be used during project construction.

The Final PEIR noise analysis disclosed that construction activities would expose existing uses to increased noise from construction up to 89 dBA Leq or above, including within 50 feet of residential uses. The Final PEIR then describes the County's regulatory structure with respect to noise and the mandatory compliance required by the County noise ordinance for construction activities. Given the County's mandatory regulatory structure with respect to noise, the Final PEIR concludes that "construction activities associated with future development in the Specific Plan area would not exceed any standards established in the LACC. Thus, impacts would be less than significant." (Final PEIR page 3.9-25) In other words, implementation of the County noise ordinance reduces the potentially significant sources of construction noise to less than significant. Therefore, construction noise would not exceed the levels shown previously in Table 3.13-6. The same findings were also found for operational sources identified for the Specific Plan Program. Operations within the Specific Plan Program area cannot exceed any noise threshold in the LACC, thus features and measures would have to be incorporated into project design by the applicant to ensure that noise from operational sources fall below the LACC noise threshold.

Finally, for off-site noise, the Specific Plan Program in the Final PEIR identified that transportation noise levels along certain roadways or from rail noise would exceed the levels in the Land Use Compatibility Matrix for certain land uses. Most notably, these land uses primarily involved single and multi-family residential land uses. Therefore, to reduce transportation impacts to any future development of single and multi-family residences, Mitigation Measure NOI-1 and NOI-2 were implemented within the Specific Plan Program. Mitigation Measure NOI-1 would require, that prior to issuance of building permits, future single and multi-family residential uses are equipped with noise attenuation features to ensure exterior noise levels do not exceed 60 dBA CNEL for single-family or 65 dBA CNEL for multi-family residential land uses. An acoustical report would be required to demonstrate compliance. Mitigation Measure NOI-2 ensures that future single and multi-family residences that would be developed near the existing Blue or Union Pacific Rail line would be exposed to exterior noise levels no greater than 60 and 65 dBA CNEL, respectively via implementation of noise attenuation features including, but not limited to, setbacks, soundwalls, glass noise barriers, and landscaping. An acoustical report would be required to demonstrate compliance. With these mitigation measures, the exposure of future residences within the Specific Plan Program from off-site mobile noise would be reduced to less than significant.

Cumulative

The Final PEIR identified that the Specific Plan Program in relation to other cumulative projects would not result in a significant contribution to cumulative construction or operational noise as all projects within the vicinity would be subject to the LACC. However, the Final PEIR did find that cumulative development located adjacent to the Metro rail line or Union Pacific rail outside of the Specific Plan Program could be exposed to exterior noise levels exceeding normally acceptable compatibility standards. Rail noise and off-site mobile noise from the Specific Plan Program would significantly contribute to the Specific Plan Program and to other cumulative projects; therefore, off-site mobile and rail noise was considered cumulatively considerable. To reduce off-site mobile noise, Mitigation Measure NOI-1 and Mitigation Measure NOI-2 were incorporated to reduce impacts to less than significant.

Proposed Project Evaluation

Proposed Project-Specific

Noise is defined as unwanted sound; however, not all unwanted sound rises to the level of a potentially significant noise impact. To differentiate unwanted sound from potentially significant noise impacts, the County of Los Angeles has established noise regulations that take into account noise-sensitive land uses. The following analysis evaluates potential noise impacts at nearby noise-sensitive land uses in each jurisdiction resulting from construction and operation of the Proposed Project.

Construction

On-Site Construction Noise

Short-term construction noise impacts are related primarily to the use of heavy construction equipment. Construction equipment can be considered to operate in two modes: stationary and mobile. Stationary equipment operates in one location for one or more days at a time, with a fixed-power operation (such as generators or pumps). Mobile equipment moves around a

construction site with power applied in a cyclical fashion (such as bulldozers, graders, and loaders). Individual pieces of construction equipment anticipated during construction of the Proposed Project could produce maximum noise levels of 73 dBA to 90 dBA L_{max} at a reference distance of 50 feet from the noise source, as shown in **Table 3.13-7,** *Construction Equipment Noise Emission Levels*. These maximum noise levels would occur when equipment is operating at full power. Typical operating cycles for equipment producing the highest noise levels involve 1 or 2 minutes of full power operation followed by 3 or 4 minutes at lower power settings. The estimated usage factor for the equipment is also shown in Table 3.13-7. The usage factors are based on the FHWA Roadway Construction Noise Model (RCNM) User's Guide (FHWA, 2006).

TABLE 3.13-7
CONSTRUCTION EQUIPMENT NOISE EMISSION LEVELS

Construction Equipment	Noise Level at 50 Feet (dBA, Lmax)	Estimated Usage Factor, %
Compressor (air)	80	40
Concrete Saw	90	20
Crane	85	16
Dozer	85	40
Drum Mixer	80	50
Excavator	81	40
Forklift	75	10
Front End Loader	79	40
Generator	82	50
Grader	85	40
Other Equipment	85	50
Pavement Scarafier	85	20
Paver	85	50
Pumps	81	50
Roller	80	20
Tractor/Loader/Backhoe	78	40
Welder	73	40

SOURCE: FHWA, 2006

Construction equipment would intermittently operate over an 8-hour period. Over the course of a construction day, the highest noise levels would be generated when multiple pieces of construction equipment are being operated concurrently. The Proposed Project's estimated construction noise levels were calculated for various scenarios including construction equipment operating simultaneously within the Project site. Based on a reasonable worst-case construction schedule as identified in Section 3.0, construction activities at up to two development areas could overlap. The estimated noise levels at the off-site sensitive receptors were calculated using the FHWA's RCNM and were based on the concurrent operation of construction equipment associated with overlapping phases as identified in Appendix H. As described above, six sensitive (residential) receptor locations were evaluated adjacent to the Project site. Receptor Locations R1 through R6 include multiple family residences and, for the purposes of this assessment, the

mobile equipment construction noise threshold for the multiple family residences is 80 dBA L_{max} and the stationary equipment construction noise threshold for multiple family residences is 65 dBA L_{max}. Receptors R4 and R5 also include single-family residences such as the housing units at 1643 E 117th Place and 11765 Compton Avenue. The mobile construction equipment noise threshold for single-family residences, for the purposes of this assessment, is 75 dBA L_{max} and the stationary equipment construction noise threshold for single family residences is 60 dBA L_{max}. Equipment was spread evenly across the specific buildout phase. The distances can be found in Appendix H of this Addendum to Final PEIR under the construction noise modeling.

Stationary Noise

The Proposed Project would include stationary equipment such as compressors, generators, pumps or welders. **Table 3.13-8,** *Proposed Project Maximum Construction Stationary Source Noise Levels* identifies the maximum stationary construction equipment noise levels for each phase at each receptor without compliance with the LACC requirement of suitable exhaust and air intake silencers (i.e., mufflers). Based on a study prepared for the U.S. Department of Transportation, the application of suitable exhaust and air-intake silencers (i.e., mufflers) could reduce noise levels by 6 to 12 dBA L_{eq} (Toth 1979). This analysis conservatively uses a noise reduction of 8 dBA L_{eq}. With an 8 dBA reduction, noise levels from the loudest stationary noise source (generator at 82 dBA L_{max}) would be reduced to 74 dBA L_{max}. This noise level would exceed both the single-family residence threshold of 60 dBA L_{max} and for multi-family residences at 65 dBA L_{max}. Because construction activities for each project within Los Angeles County are required to meet the LACC noise requirements, the Applicant will implement typical construction attenuation techniques incorporating noise barriers (and additional sound blankets for certain areas) to reduce construction noise levels associated with stationary equipment at the various noise-sensitive receptors. The Proposed Project construction attenuation techniques are described in Section 2.4.7 of this Addendum to Final PEIR and the locations are illustrated in Figure 2-10 in Section 2, Project Description.

TABLE 3.13-8
PROPOSED PROJECT MAXIMUM CONSTRUCTION STATIONARY SOURCE NOISE LEVELS

Construction Phase Number	Construction Phase	Maximum Stationary Construction Equipment Noise Levels at Off-Site Receptors (dBA L_{max})[a]					
		R1	R2	R3	R4	R5	R6
0	Sitewide Demolition/Grading	65.0	65.0	65.0	65.0	65.0	65.0
1	Athletics Field	62.9	60.3	70.8	57.0	63.4	71.4
2	Affordable Housing B1	59.5	56.7	79.2	61.9	68.0	57.1
3	Affordable Housing B2	62.5	58.9	67.7	61.9	75.9	57.1
4	Office Building	80.0	60.9	60.4	60.8	80.9	58.4
5	Student Housing B2	62.3	62.2	62.9	55.4	64.0	61.9
6	Affordable Housing B3	59.3	54.7	79.2	68.9	66.9	54.9
7	Affordable Housing B4	62.4	54.9	68.4	68.9	78.4	54.9
8	Parking Structure	88.0	76.5	56.8	56.1	66.0	58.4
9	Student Housing B1	62.9	58.4	74.9	62.4	70.5	59.1

Construction Phase Number	Construction Phase	Maximum Stationary Construction Equipment Noise Levels at Off-Site Receptors (dBA L_{max})[a]					
		R1	R2	R3	R4	R5	R6
10	Athletics Facility	68.0	68.0	59.6	56.9	66.2	61.7
11	Senior Housing	60.8	53.0	77.1	74.9	64.0	52.8
12	Student Housing B3	60.6	64.2	67.1	57.7	63.7	68.0
13	Workforce Housing	64.2	60.2	63.1	58.4	75.9	60.0
Maximum Noise Level from Construction (No Overlapping Phases) (dBA Lmax) without Los Angeles County Code Compliance [a]		**88.0**	**76.5**	**79.2**	**74.9**	**80.9**	**71.4**
Maximum Noise Level from Construction (No Overlapping Phases) (dBA Lmax) with Los Angeles County Code Compliance [c]		**80.0**	**68.5**	**71.2**	**66.9**	**72.9**	**63.4**
Maximum Noise Level from Construction Phases that Overlap (dBA Lmax) without Los Angeles County Code Compliance [a,b]		**88.0**	**76.5**	**79.5**	**71.9**	**78.7**	**68.6**
Maximum Noise Level from Construction Phases that Overlap (dBA Lmax) with Los Angeles County Code Compliance [b,c]		**80.0**	**68.5**	**71.5**	**63.9**	**70.7**	**60.6**
Proposed Project Construction Noise Technique Attenuation[d]		**-15**	**-4**	**-7**	**-7**	**-13**	**N/A**
Maximum Individual or Overlapping Noise Level (dBA Lmax) with Los Angeles County Code Compliance and Construction Noise Technique		**65.0**	**64.5**	**64.5**	**59.9**	**59.9**	**63.4**
Los Angeles County Noise Threshold for Multiple Family Residences or Single Family for Construction Mobile Noise [e]		**65**	**65**	**65**	**60**	**60**	**65**
Exceeds Los Angeles County Noise Threshold with Los Angeles County Code Compliance and Construction Noise Technique?		**No**	**No**	**No**	**No**	**No**	**No**

NOTES: Calculations performed with the FHWA RCNM software are included in Appendix J.

a. Noise Level without compliance with the Los Angeles County Code requirement of suitable exhaust and air-intake silencers (i.e., mufflers).
b. The maximum noise levels from overlapping phases are obtained from Appendix H of this Environmental Document.
c. Los Angeles County Code Compliance includes the application of suitable exhaust and air-intake silencers (i.e., mufflers). This analysis conservatively uses a noise reduction of 8 dBA Leq and is based on a U.S. Department of Transportation study that identifies a reduction of construction equipment noise levels of 6 to 12 dBA with the application of suitable exhaust and air-intake silencers (i.e., mufflers) (Toth 1979).
d The construction noise attenuation techniques are described in Section 2.4.7 of this Addendum to Final PEIR
e. See Table 3.13-6 above for noise threshold.

SOURCE: ESA 2025

Thus, by complying with the County of Los Angeles requirement for suitable exhaust and silencers and implementation of typical construction techniques incorporating noise barriers (and additional sound blankets for certain areas), construction noise from stationary equipment would be reduced to below applicable LACC stationary construction equipment noise thresholds for single family and multi-family residences. Therefore, potential stationary equipment noise impacts from Proposed Project construction activities would be less than significant.

Mobile Noise

The Proposed Project includes 13 individual development areas. A reasonable worst-case construction schedule for the individual development areas would include 14 construction phases (0 through 13) for the Proposed Project as identified in Section 3.0 of this Addendum to Final

PEIR. The worst-case construction phasing is consistent with the Proposed Project description within Section 2.0. **Table 3.13-9,** *Proposed Project Maximum Construction Mobile Source Noise Levels*, identifies the maximum mobile construction equipment noise levels for each phase at each receptor without compliance with the LACC requirement of suitable exhaust and air intake silencers (i.e., mufflers). Based on a study prepared for the U.S. Department of Transportation, the application of suitable exhaust and air-intake silencers (i.e., mufflers) could reduce noise levels by 6 to 12 dBA L_{eq} (Toth 1979). This analysis conservatively uses a noise reduction of 8 dBA L_{eq}. As shown in Table 3.13-9, after compliance with the LACC, the overlapping construction noise levels would exceed the Los Angeles County construction noise threshold for multiple family residences at all the receptors and the single-family residences at R4 and R5. The highest overlapping construction noise level would occur at receiver R1 with noise levels of approximately 91.1 dBA L_{max}.

TABLE 3.13-9
PROPOSED PROJECT MAXIMUM CONSTRUCTION MOBILE SOURCE NOISE LEVELS

Construction Phase Number	Construction Phase	Maximum Construction Noise Levels at Off-Site Receptors (dBA L_{max})[a]					
		R1	R2	R3	R4	R5	R6
0	Sitewide Demolition/Grading	86.1	81.1	90.0	77.9	86.7	76.1
1	Athletics Field	72.4	70.2	79.0	66.5	72.6	78.0
2	Affordable Housing B1	71.7	68.9	89.5	73.7	79.5	69.2
3	Affordable Housing B2	74.5	70.9	79.2	73.7	86.7	69.2
4	Office Building	86.1	68.7	68.1	68.6	86.7	65.9
5	Student Housing B2	71.2	71.9	72.0	65.7	73.5	71.8
6	Affordable Housing B3	68.8	80.1	85.3	76.6	75.4	64.6
7	Affordable Housing B4	71.6	64.6	76.3	76.4	84.7	64.6
8	Parking Structure	91.1	81.8	66.1	64.6	72.7	66.4
9	Student Housing B1	70.7	65.8	81.3	69.8	78.4	66.6
10	Athletics Facility	75.5	75.6	68.4	65.7	73.9	70.4
11	Senior Housing	69.9	63.1	83.4	82.2	73.1	63.0
12	Student Housing B3	68.0	71.9	74.1	65.4	71.7	74.9
13	Workforce Housing	73.7	69.5	72.4	67.9	82.5	69.4
Maximum Noise Level from Construction (No Overlapping Phases) (dBA Lmax) without Los Angeles County Code Compliance [a]		**91.1**	**81.1**	**90.0**	**82.2**	**86.7**	**78.0**
Maximum Noise Level from Construction (No Overlapping Phases) (dBA Lmax) with Los Angeles County Code Compliance [c]		**83.1**	**73.1**	**82.0**	**74.2**	**78.7**	**70.0**
Maximum Noise Level (dBA Lmax) from Construction Phases that Overlap without Los Angeles County Code Compliance [a,b]		**91.1**	**81.8**	**90.2**	**81.2**	**87.5**	**79.6**
Maximum Noise Level (dBA Lmax) from Construction Phases that Overlap with Los Angeles County Code Compliance [b,c]		**83.1**	**73.8**	**82.2**	**73.2**	**79.5**	**71.6**
Construction Noise Technique Attenuation[d]		**-4**	**N/A**	**-3**	**N/A**	**-5**	**N/A**

Construction Phase Number	Construction Phase	Maximum Construction Noise Levels at Off-Site Receptors (dBA L_{max})[a]					
		R1	R2	R3	R4	R5	R6
Maximum Individual or Overlapping Noise Level (dBA Lmax) with Los Angeles County Code Compliance and Construction Noise Technique		**79.1**	**73.8**	**79.2**	**74.2**	**74.5**	**71.6**
Los Angeles County Noise Threshold for Multiple Family Residences or Single Family for Construction Mobile Noise [e]		**80**	**80**	**80**	**75**	**75**	**80**
Exceeds Los Angeles County Noise Threshold with Los Angeles County Code Compliance?		**No**	**No**	**No**	**No**	**No**	**No**

NOTES: Calculations performed with the FHWA RCNM software are included in Appendix J.

a. Noise Level without compliance with the Los Angeles County Code requirement of suitable exhaust and air-intake silencers (i.e., mufflers). In addition, the mobile noise levels identified are considered worst-case because these noise levels include the combined noise levels from mobile and stationary equipment.
b. The maximum noise levels from overlapping phases are obtained from Appendix H of this Environmental Document.
c. Los Angeles County Code Compliance includes the application of suitable exhaust and air-intake silencers (i.e., mufflers). This analysis conservatively uses a noise reduction of 8 dBA Leq and is based on a U.S. Department of Transportation study that identifies a reduction of construction equipment noise levels of 6 to 12 dBA with the application of suitable exhaust and air-intake silencers (i.e., mufflers) (Toth 1979).
d The construction noise attenuation techniques are described in Section 2.4.7 of this Addendum to Final PEIR.
e See Table 3.13-6 above for noise threshold.

SOURCE: ESA 2025

The LACC states that construction, repair, or demolition activities are prohibited during the hours of 7:00 p.m. and 7:00 a.m. Monday through Friday, before 8:00 a.m. or after 6:00 p.m. on Saturday, and anytime on Sundays or legal holidays if such noise would create a noise disturbance across a residential or commercial property line (LACC, Section 12.08.440). As with the Specific Plan Program, the Proposed Project would include construction hours in accordance with the LACC. Additionally, the Applicant has included typical construction techniques incorporating noise barriers (and additional sound blankets for certain areas) to reduce construction noise levels. The Proposed Project construction attenuation techniques are described in Section 2.4.7 of this Addendum to Final PEIR and the locations are illustrated in Figure 2-10 in Section 2, Project Description.

Thus, by complying with the County of Los Angeles requirement for suitable exhaust and silencers and implementation of construction techniques incorporating noise barriers (and additional sound blankets for certain areas), construction noise from mobile equipment would be reduced to below applicable LACC mobile construction equipment noise thresholds for single family and multi-family residences. Therefore, potential mobile equipment noise impacts from Proposed Project construction activities would be less than significant.

Off-Site Construction Noise

Construction truck and worker's trips would occur throughout the construction period. Haul trucks would travel on approved truck routes designated within the County of Los Angeles. Given the Project site's proximity to Interstate 105 (I-105), haul truck traffic would take the most direct route to the appropriate freeway ramps. This analysis assumes that haul trucks would exit the Project site and travel east on 118th Street and travel north on Wilmington Avenue towards I-105.

During construction activities, an estimated maximum of approximately 139 worker and vendor one-way daily vehicle trips to and from the Project site are assumed during the overlap of phase 4 and phase 5 building construction. Based on this maximum volume of daily construction trips, construction vehicle trip noise levels would result in a 1 dBA CNEL or less increase along E 118th Street. Therefore, there would not be any conflict with the noise ordinance, and potential construction mobile noise impacts would be less than significant.

Operations

Off-Site Mobile Noise

Roadway noise levels were calculated for selected study area intersection segments located in proximity to the Project site based on information provided in the Transportation Assessment Study prepared for the Proposed Project. The roadway segments selected for analysis are expected to be most directly impacted by Proposed Project-related traffic. These roadways would experience the greatest percentage increase in traffic generated by the Proposed Project, when compared to roadways located further away from the Project site. The existing and future traffic noise levels with and without the Proposed Project were calculated using the Caltrans Technical Noise Supplement (TeNS) method and daily traffic volumes estimated from the peak hour volumes provided in the Transportation Assessment Study. The peak hour traffic volumes were evaluated to determine whether traffic noise levels with the Proposed Project would exceed permanent noise level increase standards established by the County of Los Angeles.

There are seven roadway segments in the Proposed Project vicinity that have relatively low traffic volumes along their length but are dominated by surrounding roadway noise emanating from Compton Avenue and I-105. The peak hour traffic volumes from the traffic analysis do not necessarily result in a representative ambient noise level along these select segments. Therefore, in order to accurately represent ambient noise levels along these segments, the nearest measured ambient noise levels were used instead of the modeled existing traffic noise levels. In these instances, the existing plus project traffic noise levels were calculated as the ambient noise levels plus the project only modeled traffic noise levels. These segments include:

- E. 117th Place east of Compton Avenue
- E. 117th Place west of Compton Avenue
- E. 117th Street between Compton Avenue and Holmes Avenue
- E. 117th Street west of Compton Avenue
- E. 118th Street east of Compton Avenue
- E. 118th Street west of Compton Avenue
- E. 118th Street west of Holmes Avenue

The specific assumptions used in developing these noise levels and model printouts are provided in Appendix H.

Based on the County's noise/land use compatibility matrix shown in Table 3.13-4, the County identifies normally acceptable exterior noise level limits in outdoor activity areas for various land

uses. The normally acceptable compatibility standard for new single family residential uses is 60 dBA CNEL, for multiple family residential uses is 65 dBA CNEL, for schools and hospitals uses is 70 dBA CNEL, and for new single-family and multi-family residential, churches, libraries, schools, and hospitals of up to 70 dBA CNEL, parks, offices, and commercial uses of up to 75 dBA CNEL, and industrial uses of up to 80 dBA CNEL. These CNEL noise levels are allowed if the buildings are constructed using conventional design and fresh air supply systems or air conditioning are provided to allow windows to be kept closed and interior noise levels achieve 45 dBA CNEL.

To evaluate the future traffic noise environment in the vicinity of the Project site, the future traffic noise levels on the roadways in the vicinity of the Project site were estimated based on future traffic volumes (existing with Project) provided in the Project's Transportation Assessment Study. The calculation of future traffic noise levels was conducted using the Caltrans TeNS method, which calculates the CNEL noise level based on site-specific traffic volumes, distances, and speeds. The existing and existing with Project roadway noise levels are shown in **Table 3.13-10,** *Existing with Project Roadway Noise Levels*.

As shown in Table 3.13-10, the existing with Project traffic noise levels in the vicinity of the Project site would range from 58.8 dBA CNEL (Healthy Way west of 120th Street) to 73.9 dBA CNEL (Imperial Highway east of Interstate 105 westbound ramps) at 25 feet from the roadway curb nearest the land use. As shown in Table 3.13-10, the traffic noise levels under existing with Project conditions are not anticipated to exceed the significance threshold of an increase of the ambient noise environment by 3 dB or more and the ambient noise level under the with-Project conditions fall within the Normally Unacceptable or Clearly Unacceptable land use categories in Table 3.13-4 or an increase of the ambient noise environment by 5 dB or more regardless of the ambient noise level under the with-Project conditions.

Parking Structure Noise

Sources of noise within the at-grade 8-story parking structure would primarily include vehicular movements, engine noise and vehicle door opening and closing. Ingress/egress driveways to the internal parking garage/structure would be located along East 117th Street. Based on the traffic data provided to ESA, the total afternoon peak hour traffic volume from all land uses that are included within the Proposed Project would result in 368 vehicles. Although not all 368 vehicles would travel along E. 117th Street to or from the proposed parking structure, this analysis assumes that all 368 vehicles would enter or exit the proposed parking structure within one hour. This assumption of 368 vehicles entering or exiting the proposed parking structure provides a worst-case conservative analysis of potential operational noise levels from the proposed parking structure.

TABLE 3.13-10
EXISTING WITH PROJECT ROADWAY NOISE LEVELS

Segments Within Specific Plan Program Area	Proposed Land Uses Located Along Roadway Segment	Measured Ambient Noise Level (Location/dBA)	dBA CNEL at 25 feet[a,b]			
			Existing	Existing With Project	Difference	Exceed Threshold?
E. 117th Place e/o Compton Avenue	Residential/ Commercial	R5 / 54.1[a]	54.1	56.7	2.6	No
E. 117th Place w/o Compton Avenue	Residential/ Commercial	R5 / 54.1[a]	54.1	55.0	0.9	No
E. 117th Street between Compton Avenue and Holmes Avenue	Residential/ Commercial	R1 / 60.7[a]	60.7	62.7	2.0	No
E. 117th Street w/o Compton Avenue	Residential/ Commercial	R1 / 60.7[a]	60.7	61.0	0.3	No
E. 118th Street between Holmes Avenue and Wilmington Avenue	Residential/ Commercial	N/A	65.7	65.9	0.1	No
E. 118th Street e/o Compton Avenue	Residential/ Commercial	R3 / 61.6[a]	61.6	62.0	0.4	No
E. 118th Street e/o Wilmington Avenue	Residential/ Commercial	R6 / 58.7	61.2	63.1	0.0	No
E. 118th Street w/o Compton Avenue	Residential/ Commercial	R3 / 61.6[a]	61.6	62.5	0.9	No
E. 118th Street w/o Holmes Avenue	Residential/ Commercial	R6 / 58.7[a]	58.7	59.6	0.9	No
E. 119th Street/120th Street e/o Wilmington Avenue	Residential/ Commercial	N/A	63.4	63.4	0.1	No
E. 120th Street between Compton Avenue and Healthy Way	Residential/ Commercial	N/A	63.3	63.9	0.5	No
E. 120th Street between Healthy Way and Wilmington Avenue	Residential /Commercial	N/A	66.6	67.0	0.4	No
E. 120th Street w/o Compton Avenue	Residential/ Commercial	N/A	65.7	65.8	0.1	No
I-105 EB Ramps w/o Wilmington Avenue	Residential/ Commercial	N/A	72.2	72.3	0.1	No
Imperial Highway between Compton Avenue and Wilmington Avenue	Residential	N/A	72.8	72.9	0.1	No
Imperial Highway between Wilmington Avenue and I-105 WB Ramps	Residential/ Commercial	N/A	60.4	60.4	0.0	No
Imperial Highway e/o I-105 WB Ramps	Residential/ Commercial	N/A	73.8	73.9	0.1	No
Imperial Highway w/o Compton Avenue	Residential/ Commercial	N/A	72.9	73.0	0.1	No
Compton Avenue between E. 117th Place and E. 118th Street	Residential/ Commercial	N/A	65.2	65.5	0.3	No

Segments Within Specific Plan Program Area	Proposed Land Uses Located Along Roadway Segment	Measured Ambient Noise Level (Location/dBA)	dBA CNEL at 25 feet[a,b]			
			Existing	Existing With Project	Difference	Exceed Threshold?
Compton Avenue between E. 117th Street and E. 117th Place	Residential/ Commercial	N/A	65.2	65.6	0.4	No
Compton Avenue between E. 118th Street and E. 120th Street	Residential/ Commercial	N/A	65.3	65.5	0.2	No
Compton Avenue between Imperial Highway and E. 117th Street	Residential/ Commercial	N/A	62.7	63.2	0.5	No
Compton Avenue n/o Imperial Highway	Residential/ Commercial	N/A	65.3	65.3	0.1	No
Compton Avenue s/o E. 120th Street	Residential/ Commercial	N/A	64.2	64.3	0.1	No
Healthy Way s/o E. 120th Street	Residential/ Commercial	N/A	58.8	58.8	0.0	No
I-105 WB Ramps n/o Imperial Highway	Residential/ Commercial	N/A	61.9	61.9	0.0	No
Wilmington Avenue between Imperial Highway and I-105 EB Ramps	Residential/ Commercial	N/A	68.3	68.5	0.2	No
Wilmington Avenue n/o Imperial Highway	Residential/ Commercial	N/A	66.4	66.5	0.1	No
Wilmington Avenue s/o E. 119th Street/E. 120th Street	Residential/ Commercial	N/A	66.5	66.5	0.0	No

NOTES:

a. In instances where the measured ambient noise levels were higher than the modeled existing traffic noise levels, the measured ambient noise levels were considered as the existing traffic noise levels.
b. Values may be off by 0.1 dBA due to rounding from excel.

SOURCE: ESA, 2024

Measurements from the receptors are estimated to the nearest point of the proposed parking structure. **Table 3.13-11,** *On-Site Parking Noise Levels at Noise Sensitive Receptors*, presents the estimated noise levels from the parking structure at the off-site receptor locations. Based on the Federal Transit Administration noise modeling protocol for parking structures, the maximum operational noise levels from the proposed parking structure would be 58.1 dBA Leq at 50 feet at sensitive receptor location R1 which is directly adjacent to the proposed parking structure.[4] Based on the ambient noise reading of 61.7 Leq and 59.5 L_{50}, the Leq level is approximately 2.2 dBA higher than the L_{50} level, but as a worst-case, the analysis assumes that the 58.1 dBA level at R-1 represents a L_{50} noise level that complies with the 59.5 L_{50} noise level.

4 FTA, Transit Noise and Vibration Impact Assessment. September, 2018, Tables 4-13 and 4-14.

TABLE 3.13-11
ON-SITE PARKING NOISE LEVELS AT NOISE SENSITIVE RECEPTORS

Location	Calculated Parking Lot Noise Level Leq	Ambient Noise Measurement (L_{50})	Exceedance Over Ambient
R1, Receptors north and west of the Project site along E. 117th Street	22.1[a]	59.5	0.0
R2, Receptors south and east of the Project site along E. 117th Street	31.6[b]	59.2	0.0
R3, Receptors south of the Project site along E. 118th Street	29.1[b]	55.9	0.0
R4, Receptors west of the Project site along Compton Avenue	28.3[b]	65.5	0.0
R5: Receptors west of the Project site along E. 117th Place	35.2[b]	53.0	0.0
R6, Receptors east of the Project site along E. 118th Street	27.4[b]	57.4	0.0

NOTES:

The ambient noise measurements were conducted using the Larson-Davis Soundtrack LxT1 Precision Integrated Sound Level Meter, which is a Type 1 standard instrument as defined in the American National Standard Institute S1.4. All instruments were calibrated and operated according to the applicable manufacturer specifications. The microphone was placed at a height of 5 feet above the local grade at the following locations.

a. A 36 dB reduction is applied to the parking structure noise levels for the proposed wall enclosing the parking structure from Receptor R1 as there would be no direct line of sight opening to the garage at this receptor.
b. The calculated parking lot noise level at Receptors R2 through R6 assumes only a distance attenuation and no other attenuation.

SOURCE: ESA 2025

The Proposed Project design features include a solid wall along the west side of the parking structure for the first three floors (first floor, 12.5 feet; second floor, 11.5 feet; and third floor 11.5 feet) plus a pony wall at the fourth floor (3.3 feet) for a total of 39 feet (see Appendix H for cross section). Each of the floors above the third floor would include a 3.3-foot high pony wall. The solid wall will provide a minimum 36 dB reduction to the parking structure noise levels.[5] Therefore, the parking structure noise levels at the first through third floors would, at a minimum, reduce from 58.1 dBA to 22.1 dBA, and therefore, the operational noise level would be further reduced below the Noise Ordinance standard of 59.5 dBA L_{50} over a one-hour period. In addition, for noise generated at the fourth through eighth floor as well as on the roof of the parking structure, there would be no direct line of sight opening to the sensitive receptor location R1 as these floors are higher than the receptor line of sight and noise levels would be reduced. Furthermore, the fourth floor of the parking structure and the floors above the fourth floor would be above the existing soundwall along I-105 (as shown in the cross section in Appendix H) and exposed to freeway traffic noise levels that would be higher than the maximum operational noise levels from the proposed parking structure of 58.1 dBA L_{50}. As described above, the ambient noise level at sensitive receptor location R1 (5 feet above ground surface) which is dominated by I-105 Freeway traffic noise, is 59.5 L_{50}. At elevations higher than 5 feet above the ground surface such as the fourth floor of the parking structure (39 feet above ground surface), ambient noise levels would continue to be dominated by I-105 Freeway traffic noise and would be higher than the ambient noise levels at 5 feet above ground surface because there would be less noise attenuation from the existing soundwall and earthen slope. These higher noise levels would be greater than the operational noise levels of 58.1 dBA L_{50} from the proposed parking structure.

5 FHWA, Noise Barrier Design Handbook, Updated June, 2017. Table 3. Approximate sound transmission loss values for common materials.

Therefore, operational noise levels from the parking structure above the third floor would not exceed the existing ambient noise levels and as a result would result in a less than significant impact.

As indicated in Table 3.13-11, the estimated noise levels from the first through third floor of the proposed parking structure would be well below existing ambient L_{50} noise levels and would not result in an exceedance of the Los Angeles County Noise Ordinance Standard 1. In addition, noise levels from the parking structure above the fourth floor would be below existing ambient L_{50} noise levels. As such, the Proposed Project would not result in the generation of a substantial permanent increase in ambient noise levels in the vicinity of the Proposed Project in excess of standards established within the LACC, and noise impacts from proposed parking structure would be less than significant.

On-Site Stationary Noise

In addition to roadway noise, heating, ventilation and air conditioning (HVAC) units would also result in the possibility of excessive noise. Once the Proposed Project buildings are operational, a constant source of noise may be generated from these developments from operation of HVAC systems. As with new developments within the County, new HVAC systems are required to meet LACC Section 12.08.530 – *Residential Air Conditioning or Refrigeration Equipment*. As an industry practice, that will be part of the detailed Proposed Project HVAC design prior to the issuance of a building permit, the design of the onsite HVAC units and other noise-generating mechanical equipment associated with the new proposed buildings would be installed on the rooftops of residential and non-residential buildings, setback from neighboring properties, and located either within an enclosure or behind other intervening structures, including parapets that are required to be included on the roofs of each proposed building. These design measures would provide a level of noise shielding for nearby noise-sensitive uses to comply with the regulations within the LACC Section 12.08.530. When these design measures are taken into consideration with the existing urban noise environment, the noise generated from HVAC systems and other mechanical equipment at the Proposed Project development sites can feasibly meet the regulations set forth in the LACC. Therefore, Proposed Project HVAC systems would not increase ambient noise levels that would exceed the maximum exterior noise standards set forth in LACC Section 12.08.530 for air conditioning or refrigeration equipment. As a result, noise impacts from HVAC or other mechanical equipment on the existing and future land uses adjacent to the Project site would be less than significant.

In addition to new HVAC units, the Proposed Project could result in events occurring at both the 118th Promenade and at the athletics field which is located in the eastern portion of the Project site. It is anticipated that the events will include amplified sound for special events. Special events at the athletics field would include music/entertainment concerts, celebratory ceremonies, and sporting events with an anticipated 1,000 guests. The 118th Promenade would be designated for small group gatherings of 500 or less, such as a farmers market, book fair, health fair, or similar community events, within the area of the vacated E. 118th Street. These gatherings would also include amplified sound; however, the noise levels from these amplified speakers would be set at a lower volume so participants in the immediate vicinity of where the amplified speaker is located can maintain conversational levels of speech.

LACC Section 12.08.570; states which activities are exempt from the noise restrictions including: "C. Outdoor activities conducted on public playgrounds and public or private school grounds, including but not limited to school athletics and school entertainment events". Therefore, noise from the amplified speakers at the promenade and the athletics field would comply with LACC as noise would be exempt from LACC standards. However, to ensure noise from amplified sound does not negatively affect sensitive residences around the promenade and the athletics field, a 5 dB over ambient threshold is applied to the estimated amplified sound from the proposed events. **Table 3.13-12,** *Operational Event Noise Levels,* below presents the noise levels of two speakers operating at the closest boundary of the athletics field to the identified sensitive receptors and one speaker placed at each end of the promenade. Events at the athletics field and 118th Street Promenade are not expected to take place concurrently. Therefore, the analysis estimates noise levels for events at each location independently. As shown in Table 3.13-12 below, amplified sound would only result in a maximum 1.5 dB increase over ambient at receptor R2 (i.e., 61.9 dBA compared to 60.4 dBA). Therefore, amplified sound would not result in a significant impact.

TABLE 3.13-12
OPERATIONAL EVENT NOISE LEVELS

Location and Noise Source	Maximum Noise Levels at Off-Site Receptors (dBA L_{eq})					
	R1	R2	R3	R4	R5	R6
Athletics Field						
Speakers	55.5	61.9	52.6	47.4	54.4	56.1
Crowds	47.1	49.8	43.4	40.2	45.8	48.3
Composite Noise Level (Speakers + Crowds)	56.1	62.2	53.1	48.2	55.0	56.8
Ambient Noise Levels	60.7	60.4	61.6	69.7	54.1	58.7
Ambient + Composite Noise Levels	**62.0**	**64.4**	**62.2**	**69.7**	**57.6**	**60.9**
Threshold (Ambient + 5 dB)	**65.7**	**65.4**	**66.6**	**74.7**	**59.1**	**63.7**
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
118th Street Promenade						
Speakers	14.3	19.6	35.0	14.9	19.3	35.0
Crowds	40.1	44.1	44.6	37.9	42.4	44.6
Composite Noise Level (Speakers + Crowds)	41.1	45.4	55.4	39.7	44.1	55.4
Ambient Noise Levels	60.7	60.4	61.6	69.7	54.1	58.7
Ambient + Composite Noise Levels	**60.7**	**60.5**	**62.5**	**69.7**	**54.5**	**60.4**
Threshold (Ambient + 5 dB)	**65.7**	**65.4**	**66.6**	**74.7**	**59.1**	**63.7**
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

NOTES: Calculations performed are included in Appendix J.

a. Although the Los Angeles County Noise Ordinance restrictions do not apply to the outdoor activities at the site, it is assumed that in compliance with Section 12.08.480 Places of Public Entertainment, noise levels will not exceed 95 dBA. It is assumed that the 95 dBA noise level is at 5 feet from the noise source (i.e., amplifier).

b. It is anticipated that the amplifier at the promenade would be low volume so that the target audience in the immediate vicinity of a booth can hear. In social settings people often talk with normal voice levels at distances ranging 3 to 5 feet. In such cases background noise levels should not exceed 55 to 60 dBA. In outdoor play and recreational areas people often communicate with raised or very loud voices at distances 15 to 30 feet and the background noise should not exceed 45 to 55 dBA. Thus, to be more conservative it is assumed that speakers at the promenade would operate at 80 dBA at 5 feet compared to the max 95 dBA allowed by the county ordinance.

SOURCE: ESA 2025

In addition to the amplified sound, crowd noise was also modeled. Crowd noise was modeled by splitting the crowd evenly between male and female participants. For example, for the 500 participants at the 118th Promenade, 250 were males and 250 were of females, and for the athletics field, 500 were males and 500 were of females. Within this split, it was also assumed half for each gender was speaking in a raised tone, which for males is found to be 65 dBA L_{eq} at 3 feet and 63 dBA L_{eq} for females at 3 feet. Noise from the crowds was measured from the center of the Project site as layouts for events are unknown. As shown in Table 3.13-12 noise from the crowds would not result in any increase over ambient at any of the receptors. Therefore, impacts would be less than significant.

Combined crowd and speaker (composite) noise levels would result in a 1.8 dBA increase over ambient at Receptor R2. When analyzing composite noise levels with existing ambient noise, Table 3.13-12 shows that noise levels would result in a maximum increase of 4.0 dB at Receptor R2 with the athletics field crowd and speaker noise. Therefore, impacts which would be a result of the operation of the two events within the Project site would be less than significant as the Proposed Project would not result in a 5 dB increase over ambient.

Cumulative

The geographic scope for cumulative noise impacts depends on the noise source. The geographic scope for construction noise includes areas directly adjacent to the Project site that could contribute to construction noise levels occurring within the Project site. The geographic scope for operational noise includes areas directly adjacent to the Project site. The geographic scope for roadway noise includes areas along roadway segments between intersections evaluated in the Project's Transportation Assessment Study.

Construction activities occurring in areas directly adjacent to the Project site could contribute cumulative noise levels with Proposed Project construction activities. The areas that could be exposed to the highest cumulative construction noise levels are those areas that are not separated by existing roadways. The areas that are located to the north and south of the Project site are separated by roadways including E. 117th Street and E. 118th Street, respectively. Construction activities occurring at cumulative developments would increase noise levels; however, these cumulative construction activities would be required to comply with the construction equipment noise standards provided in Section 12.08.440 of the LACC. Because construction activities would be required to comply with the LACC, cumulative construction activities would result in less than significant noise impacts. Because the Proposed Project would also be required to comply with the LACC, the Proposed Project's contribution to cumulative construction noise levels would be less than cumulatively considerable.

Cumulative development could result in exterior noise from operational activities including HVAC systems. These cumulative noise levels from operational activities could increase ambient noise levels. However, operational activities occurring in the immediate vicinity of the Project site would be required to comply with the operational noise regulations of the LACC. Therefore, noise levels from cumulative operational activities would be reduced to less than significant through compliance with the applicable noise regulations. Because operational activities associated with the Proposed Project are required to comply with the LACC, the noise levels

contributed by Proposed Project operational activities would be considered less than cumulatively considerable.

As shown in **Table 3.13-13**, *Future with Project Roadway Noise Levels (2036),* the cumulative with Project traffic noise levels within the surrounding area would range from 47.9 dBA CNEL (E. 117th Place west of Compton Avenue) to 74.0 dBA CNEL (Imperial Highway east of I-105).

TABLE 3.13-13
FUTURE WITH PROJECT ROADWAY NOISE LEVELS (2036)

Segments Within Specific Plan Program Area	Existing and Future Land Uses Located Along Roadway Segment	Measured Ambient Noise Level (Location/ dBA)	dBA CNEL at 25 feet[a,b]			
			Future	Future With Project	Difference	Exceed Threshold?
E. 117th Place e/o Compton Avenue	Residential/Commercial	R5 / 54.1[a]	48.4	57.4	3.3	No
E. 117th Place w/o Compton Avenue	Residential/Commercial	R5 / 54.1[a]	47.9	55.8	1.7	No
E. 117th Street between Compton Avenue and Holmes Avenue	Residential/Commercial	R1 / 60.7[a]	53.5	63.3	2.6	No
E. 117th Street w/o Compton Avenue	Residential	R1 / 60.7[a]	50.1	61.4	0.7	No
E. 118th Street between Holmes Avenue and Wilmington Avenue	Residential/Commercial	N/A	66.0	66.1	0.2	No
E. 118th Street e/o Compton Avenue	Residential/Commercial	R3 / 61.6[a]	58.3	63.5	1.9	No
E. 118th Street e/o Wilmington Avenue	Residential/Commercial	R6 / 58.7	61.3	61.3	0.0	No
E. 118th Street w/o Compton Avenue	Residential	R3 / 61.6[a]	56.1	63.5	1.9	No
E. 118th Street w/o Holmes Avenue	Residential/Commercial	R6 / 58.7[a]	58.8	54.4	-4.3	No
E. 119th Street/120th Street e/o Wilmington Avenue	Residential/Commercial	N/A	63.6	63.6	0.1	No
E. 120th Street between Compton Avenue and Healthy Way	Residential/Commercial	N/A	63.5	63.9	0.5	No
E. 120th Street between Healthy Way and Wilmington Avenue	School/Hospital	N/A	66.8	67.1	0.3	No
E. 120th Street w/o Compton Avenue	Residential/Commercial	N/A	65.9	66.0	0.1	No
I-105 EB Ramps w/o Wilmington Avenue	Residential/Commercial	N/A	72.3	72.5	0.1	No
Imperial Highway between Compton Avenue and Wilmington Avenue	Residential/Commercial	N/A	72.9	73.1	0.1	No
Imperial Highway between Wilmington Avenue and I-105 WB Ramps	Residential/Commercial	N/A	60.5	60.5	0.0	No
Imperial Highway e/o I-105 WB Ramps	Residential/Commercial	N/A	74.0	74.0	0.1	No

Segments Within Specific Plan Program Area	Existing and Future Land Uses Located Along Roadway Segment	Measured Ambient Noise Level (Location/ dBA)	dBA CNEL at 25 feet[a,b]			
			Future	Future With Project	Difference	Exceed Threshold?
Imperial Highway w/o Compton Avenue	Residential/Commercial	N/A	73.0	73.2	0.1	No
Compton Avenue between E. 117th Place and E. 118th Street	Residential	N/A	65.4	65.6	0.3	No
Compton Avenue between E. 117th Street and E. 117th Place	Residential/Commercial	N/A	65.3	65.7	0.4	No
Compton Avenue between E. 118th Street and E. 120th Street	Residential/Commercial/ School	N/A	65.5	65.6	0.2	No
Compton Avenue between Imperial Highway and E. 117th Street	Residential	N/A	62.9	63.3	0.5	No
Compton Avenue n/o Imperial Highway	Residential/Commercial	N/A	65.4	65.5	0.1	No
Compton Avenue s/o E. 120th Street	Residential/Commercial	N/A	64.4	64.5	0.1	No
Healthy Way s/o E. 120th Street	Hospital	N/A	58.9	58.9	0.0	No
I-105 WB Ramps n/o Imperial Highway	Residential/Commercial	N/A	62.0	62.0	0.0	No
Wilmington Avenue between Imperial Highway and I-105 EB Ramps	Commercial	N/A	68.5	68.6	0.2	No
Wilmington Avenue n/o Imperial Highway	Residential/Commercial	N/A	66.5	66.6	0.1	No
Wilmington Avenue s/o E. 119th Street/E. 120th Street	Residential/Commercial/ Hospital	N/A	66.6	66.7	0.0	No

NOTES:

a. In instances where the measured ambient noise levels were higher than the modeled future traffic noise levels, the measured ambient noise levels were considered as the future traffic noise levels.
b. Values may be off by 0.1 dBA due to rounding from excel.

SOURCE: ESA, 2024

As shown in Table 3.13-13, the traffic noise levels under future (cumulative) with Project conditions are anticipated to exceed the County's normally acceptable compatibility standards along 6 of the 10 roadway segments. As stated previously, the normally acceptable compatibility standard for new single family residential uses is 60 dBA CNEL, for multiple family residential uses is 65 dBA CNEL, and for commercial, school and hospital uses is 70 dBA CNEL. Therefore, cumulative development would result in significant noise impacts at the land use receptors within the surrounding area. As shown in Table 3.13-13, the Proposed Project's contribution to cumulative noise levels that exceed the normally acceptable compatibility standards would be less than cumulatively considerable because the Proposed Project's contribution would be less than 3 dBA CNEL.

Cumulative development could be located adjacent to the Metro rail line or Union Pacific rail tracks and could be exposed to exterior noise levels from rail operations exceeding the normally acceptable compatibility standards. Therefore, cumulative development could be exposed to

significant noise impacts from rail operations. Because the Project site is not located in close proximity to the Metro rail line or Union Pacific rail tracks, the noise sensitive residential uses that are part of the Proposed Project would be exposed to less than significant noise levels from rail operations. In addition, the Proposed Project would not contribute to the cumulative rail noise impacts on land uses located near the tracks.

Applicable Mitigation Measures for the Proposed Project

Unlike the potential significant noise impacts identified with the implementation of the Specific Plan Program, the implementation of the Proposed Project would not result in significant noise impacts. However, the Applicant will implement Specific Plan Program Mitigation Measure NOI-1 to ensure that the Proposed Project residential uses and the residential uses adjacent to the Project site will not exceed the County's exterior noise standards or the County's Noise Ordinance. Because the Project site is not located in close proximity to the A Line (formerly Blue line) and Union Pacific rail line, the implementation of Mitigation Measure NOI-2 is not required.

> **Mitigation Measure NOI-1:** Prior to the issuance of building permits, exterior areas of proposed ~~single family and~~ multiple family residential uses that are projected to be exposed to existing with Project roadway noise levels and cumulative with Project roadway noise levels exceeding the County's exterior noise standards (i.e., ~~60 dBA CNEL for single family residential and~~ 65 dBA CNEL for multiple family residential) shall include noise attenuation features including, but not limited to, setbacks, soundwalls, glass noise barriers, and landscaping so that exterior areas meet the County's exterior noise standards. In addition, construction activities on the Project site will include construction techniques such as sound barriers and sound blankets where necessary to meet the County's Noise Ordinance. To ensure that the County's exterior noise standard for the proposed multi-family residential uses (65 dBA CNEL) are met, the ~~project~~ Applicant shall demonstrate compliance through the preparation of an acoustical evaluation and if the Proposed Project's construction techniques identified in Section 2.4.7 of this Addendum are modified, the Applicant shall demonstrate compliance with the County's Noise Ordinance to the County Department of Public Health through the preparation of an acoustical evaluation.
>
> **Mitigation Measure NOI-2 (Removed):** ~~Prior to the issuance of building permits, proposed residential developments adjacent to the Blue line and Union Pacific rail line that are exposed to rail noise of greater than 60 dBA CNEL for single family residential uses and 65 dBA CNEL for exterior areas of multiple family residential uses shall include noise attenuation features including, but not limited to, setbacks, soundwalls, glass noise barriers, and landscaping so that exterior areas meet the County's exterior noise standards. To ensure that the County's exterior noise standards are met, the project applicant shall demonstrate compliance through the preparation of an acoustical evaluation.~~

Conclusion

Unlike the Specific Plan Program's potential significant noise impacts, the Proposed Project would result in less than significant construction and operational noise impacts. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial

increase in the severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Ground-borne Vibration or Ground-borne Noise Levels

Impact 3.12-2: The Specific Plan Program and Proposed Project could have significant and cumulatively considerable effects from the generation of excessive ground-borne vibration or ground-borne noise levels.

Summary of Final PEIR Evaluation

The Final PEIR identified that residential receptors that are located immediately adjacent to a construction site could be exposed to excessive groundborne vibration levels. Under construction scenarios where a construction site associated with development under the Specific Plan Program is located within 25 feet from an existing adjacent land use, peak vibration levels experienced by these adjacent land uses can be above the damage potential level of 0.2 PPV for non-engineered timber and masonry buildings and 0.12 PPV for historic-age buildings. In addition, the Final PEIR identified that construction activities under the Specific Plan Program could expose land uses above the vibration threshold for human annoyance at residential areas which is 78 VdB for daytime activities and 72 VdB for nighttime activities. These exceedances of the vibration threshold would represent significant vibration impacts. The Final PEIR included Mitigation Measures NOI-3 and NOI-4. Mitigation Measure NOI-3 requires construction activities within 50 feet of occupied residential structures to reduce vibration levels below the structural damage and human annoyance thresholds. Mitigation Measure NOI-4 requires proposed residential development within 100 feet of the existing rail tracks to be designed such that vibration levels from the rail operations do not exceed the vibration threshold for human annoyance.

The Final PEIR also stated that groundborne vibration within and surrounding the Specific Plan Program area could result from heavy-duty vehicular travel (e.g., refuse trucks, delivery trucks, and transit buses) on the nearby local roadways. The land uses proposed within the Specific Plan Program area would increase the use of these existing heavy-duty vehicles on the local roadways. Groundborne vibration from heavy-duty vehicular travel could generate velocity levels of approximately 63 VdB (approximately 0.006 in/sec) at a distance of 50 feet, and these levels could reach approximately 72 VdB (approximately 0.016 in/sec PPV) where trucks pass over bumps in the road. Based on a human annoyance threshold of 78 VdB (0.032 in/sec PPV) and a structural damage threshold of up to 0.12 in/sec PPV, heavy-duty vehicular travel associated with the uses proposed within the Specific Plan Program would result in a less than significant groundborne vibration impact. As such, vibration impacts associated with operation of the future residential and non-residential developments implemented by the Specific Plan Program would be less than significant.

Cumulative

The geographic scope for cumulative vibration impacts includes areas directly adjacent to the Specific Plan Program area that could contribute to construction or operational vibration levels within the Specific Plan Program.

Cumulative development could occur adjacent to the Specific Plan Program area. Construction activities associated with the cumulative development could exceed the vibration thresholds for human annoyance and structural damage depending on the distance to the receptor and the construction equipment used. This exceedance of the vibration threshold would result in a significant vibration impact. Because the Specific Plan Program could result in significant human annoyance and structural damage vibration impacts from construction activities, the Specific Plan Program's contribution to cumulative vibration impacts from construction activities would be cumulatively considerable. The implementation of Mitigation Measures NOI-1 and NOI-2 would reduce the Specific Plan Program's contribution to potential significant construction vibration impacts to less than significant.

Cumulative development could increase heavy-duty vehicular truck traffic within the Specific Plan Program area. This truck traffic is estimated to generate vibration levels of up to 72 VdB (approximately 0.016 in/sec PPV). This vibration level from cumulative development would not exceed the human annoyance or structural damage threshold, and therefore, would result in less than significant impacts. Because the Specific Plan Program would generate similar vibration levels from truck traffic as cumulative development, the Specific Plan Program's contribution to cumulative impacts would be less than cumulatively considerable.

Cumulative development could contribute to groundborne vibration through operational activities; however, these activities are expected to occur in the daytime and result in a nominal potential increase in vibration levels on future residential uses within the Specific Plan Program area. Cumulative vibration levels would not exceed the daytime human annoyance threshold or structural damage threshold. Therefore, cumulative vibration impacts would be less than significant. Because the Specific Plan Program would result in less than significant vibration impacts associated with daytime human annoyance and structural damage, the Specific Plan Program's contribution to these vibration impacts would be less than cumulatively considerable.

Although future residential uses associated with the Specific Plan Program and in the vicinity of the existing rail tracks could be exposed to vibration levels that would exceed the nighttime human annoyance, future growth associated with cumulative development would not contribute to nighttime vibration impacts. Therefore, cumulative development would result in no nighttime vibration impacts.

Proposed Project Evaluation

Proposed Project-Specific

Common sources of vibration impacts from construction activities include; blasting, pile-driving and operation of heavy earth-moving equipment. However, the construction activities associated with the Proposed Project will not include blasting and pile-driving equipment. Sensitive receptors for vibration include structures (especially older masonry structures), people and

vibration sensitive equipment. Presently, the County of Los Angeles quantifies the level at which excessive groundborne vibration occurs which would be at 0.04 PPV (in/sec) for human annoyance. Groundborne vibration levels resulting from construction activities have been estimated by the Federal Transit Authority (FTA) in its Transit Noise and Vibration Impact Assessment (FTA, 2018). The manual provides practical guidance to evaluating vibration impacts from construction activities. There are several different methods that used to quantify vibration impacts. For vibration damage at structures, a threshold of 0.2 PPV (in/sec) is used for non-engineered timber and masonry buildings and 0.12 PPV (in/sec) is used for historic-age buildings that are extremely susceptible to vibration damage. For more modern industrial and commercial buildings such as the Research Center at CDU adjacent to E. 118th Street, a threshold of 0.5 PPV (in/sec) is used and for newer residential structures such as the Willowbrook Green Apartments that were constructed in 1990 a threshold of 0.5 PPV (in/sec) is used. The Peak Particle and RMS Velocity levels of vibration impacts are shown in **Table 3.13-14,** *Vibration Source Levels for Construction Equipment*.

TABLE 3.13-14
VIBRATION SOURCE LEVELS FOR CONSTRUCTION EQUIPMENT

	Approximate PPV (in/sec)					Approximate RMS (VdB)				
Equipment[a]	**25 Feet**	**50 Feet**	**75 Feet**	**100 Feet**	**35 Feet**	**25 Feet**	**50 Feet**	**75 Feet**	**100 Feet**	**35 Feet**
Vibratory Roller	0.210	0.074	0.040	0.026	0.127	94	88	85	82	91
Large Bulldozer	0.089	0.031	0.001	0.011	0.054	93	84	79	75	84
Loaded Trucks	0.076	0.027	0.0008	0.010	0.046	86	77	72	68	83
Jackhammer	0.035	0.012	0.0004	0.004	0.021	79	70	67	61	76
Small Bulldozer	0.003	0.001	0.00003	<0.001	0.002	58	49	44	40	54

NOTE:
a. Some construction equipment may be located at distances closer than 35 feet; however, they would not be producing significant vibration.
SOURCE: FTA, 2018.

Vibration can result from the use of heavy construction equipment such as a vibratory roller, dozer, and a loaded truck. As shown in Table 3.13-14, the significance threshold of 0.4 in/s PPV that could result in damage to buildings would dissipate beyond 25 feet from the operation of the equipment analyzed above. The closest residential uses would be approximately 35 feet from where construction activities would occur. At this distance, the residential uses (i.e., Willowbrook Green Apartments) would be exposed to up to 0.127 in/s PPV to the south of the Project site where a vibratory roller would be used for asphalt paving along E. 118th Street. As described, vibration levels at the Willowbrook Green Apartments could be exposed to vibration levels of up to 0.127 PPV (in/sec) which would not exceed the vibration impact significance threshold of 0.5 PPV (in/sec). Potential vibration impacts would be less than significant.

As shown in Table 3.13-14, the human annoyance significance threshold of 80 RMS (VdB) (which equals 0.04 PPV (in/sec)) would dissipate beyond 25 feet from the operation of the

equipment analyzed above. The closest residential uses would be approximately 35 feet from where construction activities would occur. At this distance, the residential uses would be exposed to up to 91 VdB with the use of a vibratory roller. As described, vibration levels at the sensitive receptor locations would exceed the vibration impact significance threshold of 80 RMS (VdB). Potential vibration impacts would be potentially significant. Therefore, as with the Specific Plan Program, the Proposed Project would implement Mitigation Measure NOI-3 to reduce vibration impacts to less than significant.

Implementation of Mitigation Measure NOI-3 would prohibit the use of construction equipment that generates high levels of vibration within 50 feet of an occupied residential structure. If construction equipment is required to be used within 50 feet, the Applicant will be required to demonstrate that the human annoyance and structure damage thresholds from vibration impacts would be met.

Operation of the Proposed Project would not include any components that would generate substantial vibration levels at the source. Thus, impacts associated with operational vibration would be less than significant.

Railroad operations located to the north and east of the Project site would not be of concern as the nearest housing development associated with the Proposed Project would be 600 feet and 1,900 feet, respectively, away from existing rail tracks. Therefore, the residential uses proposed as part of the Proposed Project would be exposed to less than significant vibration impacts from rail operations.

Cumulative

The geographic scope for cumulative vibration impacts includes areas directly adjacent to the Proposed Project that could contribute cumulatively to construction or operational vibration levels.

Cumulative development could occur in the vicinity of the Project site. Construction activities associated with the cumulative development could exceed the vibration thresholds for human annoyance and structural damage depending on the distance to the receptor and the construction equipment used. This exceedance of the vibration threshold would result in a significant vibration impact. Because the Proposed Project could result in significant human annoyance and structural damage vibration impacts from construction activities, the Proposed Project's contribution to cumulative vibration impacts from construction activities would be cumulatively considerable.

Cumulative development could increase heavy-duty vehicular truck traffic within the local roadways around the Project site. The truck traffic is estimated to generate vibration levels of up to 72 VdB (approximately 0.016 PPV in/sec). This vibration level from cumulative development would not exceed the human annoyance or structural damage threshold, and therefore, would result in less than significant impacts. Because the Proposed Project would generate similar vibration levels from truck traffic as cumulative development, the Proposed Project's contribution to cumulative impacts would be less than cumulatively considerable.

Cumulative development could contribute to groundborne vibration through operational activities; however, these activities are expected to occur in the daytime and result in a nominal potential increase in vibration levels on future residential uses within the surrounding environment. Because the Proposed Project would also result in less than significant vibration impacts from operational activities, the Proposed Project's contribution to cumulative vibration impacts would be less than cumulatively considerable.

Cumulative development could be exposed to significant vibration levels associated with rail operations along the Metro Blue Line and/or Union Pacific rail line. Therefore, cumulative vibration impacts would be potentially significant. Because the Project site is located a minimum of 600 feet from a rail line, the Proposed Project's impact from rail operations would be less than cumulatively considerable.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, the Proposed Project could result in significant construction vibration impacts. However, as with the Specific Plan Program, the Proposed Project would implement Mitigation Measure NOI-3 to reduce construction vibration impacts to less than significant. Mitigation Measure NOI-3 has been updated to include the vibration threshold identified in the LACC which is 0.04 in/sec PPV which corresponds to 80 VdB. Because the Project site is located a minimum of 600 feet from a rail line and would not be exposed to significant rail line noise, the Proposed Project would not be required to implement Mitigation Measure NOI-4.

> **Mitigation Measure NOI-3 (Revised):** Prior to approval of a grading permit or building permit, construction equipment shall be prohibited within 50 feet of occupied residential structures. If construction equipment is required to be within 50 feet of occupied residential structures, the project applicant shall demonstrate that the human annoyance threshold of ~~78 VdB (0.032 in/sec PPV)~~ 80 VdB (0.04 in/sec PPV) and structural damage thresholds of 0.2 in/sec PPV for non-engineered timber and masonry buildings and 0.12 in/sec PPV for historic-age buildings that are extremely susceptible to vibration damage is achieved. Demonstration of compliance shall be provided through the preparation of a vibration analysis.
>
> **Mitigation Measure NOI-4 (Removed):** ~~Prior to the issuance of a building permit for a residential development within 100 feet of the rail tracks, the project applicant shall demonstrate that nighttime vibration level at the proposed residential uses shall not exceed the 72 VdB (0.016 in/sec PPV) threshold for human annoyance.~~

Conclusion

As with the Specific Plan Program, the Proposed Project would result in less than significant construction vibration impacts with the implementation of Mitigation Measure NOI-3. In addition, the Specific Plan Program and the Proposed Project would result in less than significant operational vibration impacts Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known

with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Expose People to Excessive Aircraft Noise Levels

Impact 3.12-3: The Specific Plan Program and Proposed Project would not impact or contribute to cumulative impacts related to the exposure of people residing or working in the Project area to excessive aircraft noise levels.

Summary of Final PEIR Evaluation

The Initial Study/Notice of Preparation and Final PEIR identified that the Specific Plan Program area is not located in the jurisdiction of an airport land use compatibility plan, nor is it in an airport approach zone. The nearest public airport is approximately 2.1 miles south of the Specific Plan Program area (Compton/Woodley Airport). Hawthorne Municipal Airport is approximately 4.6 miles west of the Specific Plan Program area. Due to the distance of the Specific Plan Program area from an existing airport, the Specific Plan Program would not expose people residing or working within the Specific Plan Program area to excessive aircraft noise levels, and no aircraft noise impacts would occur.

Proposed Project Evaluation

Proposed Project-Specific

The nearest airport to the Project site is the Compton/Woodley Airport, located approximately 2.1 miles to the south. Due to the distance to the nearest airport, the Proposed Project would not expose people residing or working on the Project site to excessive aircraft noise levels, and no aircraft noise impacts would occur.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project would not expose people residing or working within the area to excessive aircraft noise levels, and no aircraft noise impacts would occur. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

3.13.6 References

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3.14 Population and Housing

3.14.1 Introduction

This section addresses population and housing, specifically related to unplanned population growth and displacement of existing people/housing, and the potential of the Proposed Project to cause impacts. This section includes a brief summary of the environmental setting included in the Final PEIR, and the identification of any applicable changes to the direct and indirect population and housing setting that may have occurred since the certification of the Final PEIR. In addition, a brief summary of the regulatory setting included in the Final PEIR and any substantive revisions to the regulatory setting that has occurred since the certification of the Final PEIR. This section also includes the thresholds of significance and a brief summary of the impacts to existing people or housing, and mitigation measures addressed in the Final PEIR as well as the potential population and housing impacts associated with the Proposed Project. Finally, this section provides a conclusion of whether (1) the Proposed Project includes substantial changes that would require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact related to population and housing; (2) substantial changes in the circumstances under which the Proposed Project is undertaken would require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact related to population and housing; or (3) new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3) exist related to population and housing.

3.14.2 Environmental Setting

The population, housing and employment assumptions for the Specific Plan Program area, including the Project site, were evaluated within the Specific Plan Final PEIR. **Table 3.14-1,** *Population and Employment Evaluated in Specific Plan Final Program EIR*, provides the projections identified in the Specific Plan Final PEIR for the Project site. Below is a discussion of the assumptions.

Population

As evaluated in the Final PEIR, the Specific Plan Program included an anticipated increase in residential population within the Specific Plan Program area. The projected increase in residential population within the Specific Plan Program area is based on the incremental increase in the number of housing units that would occur under the Program (1,952 units) and based on the County's average household size of 2.94 residents per dwelling unit. The estimated residential population growth for the Specific Plan Program area is 5,739 persons.

TABLE 3.14-1
POPULATION AND EMPLOYMENT EVALUATED IN SPECIFIC PLAN FINAL PROGRAM EIR

Specific Plan Group Location # and Land Use	Population and Employment Evaluated in Specific Plan Final Program EIR
Group Location 3E	
Residential (DU)	553
Residential Population[a]	1,626
Non-Residential (SF)	375,433
Employees[b]	807
Group Location 3F	
Residential (DU)	145
Residential Population[a]	115
Non-Residential (SF)	98,494
Employees[b]	212
Total Group Locations 3E and 3F	
Residential (DU)	698
Residential Population[a]	1,741
Non-Residential (SF)	473,927
Employees[b]	1,019
Total Existing Population and Employees within Group Location 3F	
Residential	106
Residential Population[a]	312
Non-Residential	0
Employees	0
Total Population and Employees Evaluated within Group Locations 3E and 3F without Existing Uses	
Residential (DU)	592
Residential Population[a]	1,429
Non-Residential (SF)	473,927
Employees[b]	1,019

NOTES:

DU – Dwelling Unit

SF – Square Feet

a. Residential population is based on the County's average household size of 2.94 residents per dwelling unit identified within the Willowbrook Transit-Oriented District Specific Plan Final PEIR.
b. Employee estimates are based on the employee ratio per 1,000 square feet of non-residential uses. The Specific Plan Program identified a total of 2,666,035 square feet of non-residential use and identified a total of 5,632 employees which corresponds to 2.15 employee per 1,000 square feet of non-residential use. The 2.15 employee per 1,000 square feet is used for the employee estimate.
c. The total existing population and employees within Group Location 3F was subtracted from the total population and employees within Group Locations 3E and 3F evaluated within the Specific Plan Final PEIR to derive the number of housing units and employees remaining to be located within Group Locations 3E and 3F.

SOURCE: ESA, 2024

The Final PEIR included projections for each area within the Specific Plan Program area. The Project site is located within a development area identified as Group Locations 3E and 3F within the Specific Plan Program area. Group Location 3E encompasses the same area as the

approximately 11.5-acre portion of the Project site located south of East 117th Street. Group Location 3F encompasses approximately 1.3 acres of the Project site located north of East 117th Street as well as approximately 1.67 acres located west of the Project site. The 1.67 acres includes four residential parcels that include 102 residential units that were approved after approval of the Specific Plan Program and 4 residential units that existed on two other parcels prior to approval of the Specific Plan Program. Currently, there is no additional undeveloped land located on the portion of Group Location 3F that is west of the Project site. Therefore, the remaining residential development that was evaluated within the Specific Plan Final PEIR for Group Locations 3E and 3F is 592 units. Based on the County's average household size of 2.94 residents per dwelling unit, the residential population assumption for the remaining residential development evaluated within Group Locations 3E and 3F in the Specific Plan Program Final PEIR is 1,429 residents.

Housing

As discussed above, the Specific Plan Final PEIR evaluated the anticipated increase in development within the Program area. The Final PEIR evaluated a projected incremental increase of 1,952 dwelling units within the Specific Plan Program area. In addition, the Final PEIR evaluated a projected incremental increase of 698 dwelling units within Group Locations 3E and 3F. Without accounting for existing units that are located within Group Location 3F, the remaining residential development evaluated within Group Locations 3E and 3F in the Final PEIR is 592 units as discussed above and depicted in Table 3.14-1.

Employment

The Final PEIR evaluated a projected incremental increase of 5,632 employees that would occur from the projected increase in non-residential development within the Specific Plan Program. The Final PEIR identified a total of 2,666,035 square feet of non-residential use. The amount of non-residential development and the number of employees corresponds to 2.15 employees per 1,000 square feet of non-residential use. The Final PEIR evaluated an incremental increase of 473,927 square feet of non-residential development for Group Locations 3E and 3F. Based on the employee ratio of 2.15 employees per 1,000 square feet of non-residential use, the remaining non-residential development evaluated within Group Locations 3E and 3F in the Final PEIR includes 1,019 employees.

3.14.3 Regulatory Setting

Senate Bill 375

Adopted into law in 2008, Senate Bill (SB) 375 links regional transportation and housing planning with state greenhouse gas reduction goals. The law requires the California Air Resources Board to establish, for each region of the state, GHG reduction targets for the automobile and light truck sector and requires the regional transportation plan for each region to include a Sustainable Communities Strategy (SCS) to achieve its GHG reduction target.

The law assigns responsibility for developing the SCS for Southern California to the Southern California Association of Governments (SCAG). The SCS must identify the general location of uses, residential densities, and building intensities in the region and identify areas within the region

that will house all of the region's population, including all economic segments of the population, taking into account migration into the region and population growth, over the next 25 years. SB 375 requires regional Sustainable Communities Strategies to forecast development patterns that, when integrated with the region's transportation system, achieves statewide GHG reduction targets.

State of California Housing Element Requirements

California Housing Element Law (Government Code Section 65580, et seq.) requires cities and counties to include, as part of their general plans, a housing element to address housing conditions and needs in the community. The housing element law requires the California Department of Housing and Community Development, in consultation with each regional council of governments, to determine each region's existing and projected housing need. The regional council of governments in turn develops a regional housing allocation plan that includes the actual allocation of housing need to the cities and counties within the region. Allocations are based on factors that consider existing employment, employment growth, household growth, and the availability of transit. Need is determined for households in all income categories from very-low to above-moderate (SCAG, 2024). Cities and counties are required to plan for their allocated number of housing units within the housing elements of their general plans. Housing elements are required to be updated every eight years, following timetables adopted by the state. Each agency's housing element must identify and analyze existing and projected housing needs and "make adequate provision for the existing and projected needs of all economic segments of the community," among other requirements.

Southern California Association of Governments

SCAG is the federally-designated Metropolitan Planning Organization (MPO) for the six-county Southern California region consisting of Los Angeles, Ventura, Orange, San Bernardino, Riverside, and Imperial counties. SCAG is responsible for updating the Regional Transportation Plan (RTP) every four years that results in the continued development, integrated management and operation of transportation and facilities that will function as an intermodal transportation network for the SCAG metropolitan planning area. Because most areas within the SCAG region have been designated as nonattainment or maintenance areas for one or more transportation related criteria pollutants under the federal Clean Air Act (42 U.S.C. Section 7401 et seq.), the Plan must conform to the applicable State Implementation Plan (SIP). The passage of California Senate Bill 375 (SB 375) in 2008 requires that SCAG prepare and adopt a Sustainable Communities Strategy (SCS) that sets forth a forecasted regional development pattern which, when integrated with the transportation network, measures and policies, will reduce greenhouse gas (GHG) emissions from automobiles and light-duty trucks and achieve the GHG emissions reduction target for the region set by the California Air Resources Board (Govt. Code Section 65080(b)(2)(B)). In addition, the focus on equity in this Plan supports compliance with Title VI of the Civil Rights Act of 1964 and Environmental Justice guidance at the state and federal levels, To comply with the above requirements, SCAG updated the RTP/SCS as the SCAG Connect SoCal 2024 in April 2024.

SCAG Regional Housing Needs Assessment

The RHNA is mandated by state housing law as part of the periodic process of updating local housing elements of the General Plan. The RHNA quantifies the need for housing within each

jurisdiction during specified planning periods, or cycles. In prior cycles, factors such as household growth and household income distribution were the primary factors considered in determining a jurisdiction's RHNA allocation. SCAG's 6th Cycle RHNA quantifies the regional need for housing and then allocates the regional need to each jurisdiction for a planning period between October 2021 and October 2029 (SCAG, 2021). The 6th Cycle RHNA is focused on existing need (current housing shortages and overcrowding) plus projected growth. For the 6th RHNA Cycle, SCAG considers other factors in addition to household growth. These factors include transit accessibility, job accessibility, and indicators that influence a community's environmental, educational, and economic resource accessibility.

Consistent with the state housing law, the primary objectives the 6th Cycle RHNA allocation plan are:

- Increase the housing supply and mix of housing types, tenure and affordability within each region in an equitable manner
- Promote infill development and socioeconomic equity, the projection of environmental and agricultural resources, and the encouragement of efficient development patterns
- Promote an improved intraregional relationship between jobs and housing
- Allocating a lower proportion of housing need in income categories in jurisdictions that have a disproportionately high share in comparison to the county distribution
- Affirmatively furthering fair housing

Local jurisdictions are required to plan and zone to accommodate their respective RHNA allocation (housing units) by income categories through the process of updating the Housing Elements of their General Plans. Communities use the RHNA in land use planning, prioritizing local resource allocation, and in deciding how to address identified existing and future housing needs resulting from population, employment and housing unit growth. The RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth, so that collectively the region and sub region can grow in ways that enhance quality of life, improve access to jobs, promotes transportation mobility, addresses social equity, and fair share housing needs. The assigned RHNA for the County as a whole and the unincorporated areas of the County are shown in **Table 3.14-4,** *SCAG's 6th Cycle Final Regional Housing Needs Allocations*. The unincorporated areas of the County have been assigned a RHNA of 90,052 units for the 6th Cycle.

TABLE 3.14-2
SCAG'S 6TH CYCLE FINAL REGIONAL HOUSING NEEDS ALLOCATIONS

Area	Total	Very Low Income	Low Income	Moderate	Above Moderate
Los Angeles County	812,060	217,273	123,022	131,381	340,384
Unincorporated Los Angeles County	90,052	25,648	13,691	14,180	36,533

SOURCE: SCAG 2021

Local

Los Angeles County 2035 General Plan

The Los Angeles County General Plan contains policies that regulate the use of land within the County, including the Project site and its vicinity, and provides a long-term vision for the future physical evolution of the County as it seeks to achieve its desired future. The plan governing the future development of the Project site is the Willowbrook Transit-Oriented District Specific Plan Program.

3.14.4 Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines and the County of Los Angeles Environmental Checklist Form, the project could have a significant on population and housing if it would:

- Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? (See Impact 3.14-1 below).
- Displace substantial numbers of existing people or housing, especially affordable housing, necessitating the construction of replacement housing elsewhere? (See Impact 3.14-2 below).

3.14.5 Impact Analysis

Induce Population Growth

Impact 3.14-1: The Specific Plan Program and Proposed Project would result in a less than significant and less than cumulatively considerable environmental impacts from the inducement of substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Final PEIR identified that the Specific Plan Program would involve up to a net total increase of 1,952 residential units, as well as approximately 2,666,035 square feet of non-residential employment generating uses. This new development would result in population growth as it provides new homes and businesses in the Specific Plan Program area.

Using the County's average household size of 2.94, the addition of 1,952 residential units into the Specific Plan Program area would generate a population of approximately 5,739 persons. Based on employment projections provided within the Final PEIR, the approximately 2,666,035 square feet of non-residential employment-generating uses would result in a net increase of approximately 5,632 jobs. The Final PEIR compared the growth projected within the Final PEIR to the SCAG 2016 RTP/SCS and to the County of Los Angeles incremental population growth projections in 2016 and found that the growth projections evaluated within the Final PEIR were greater than the County General Plan and the 2016 RTP/SCS growth projections.

The Final PEIR identified that the determination of whether the proposed growth represents a significant impact is whether the project would induce additional growth that would result in significant impacts to the environment. The determination of whether the Specific Plan Program would induce growth in the project vicinity or within the County is based on whether the increase in residential population and housing in the Specific Plan Program area would increase the need for additional commercial or public services beyond the existing commercial or public services and the commercial services proposed as part of the Specific Plan. In addition, a determination of inducement of growth is whether the increase in job growth within the Specific Plan Program area would increase the need for additional housing beyond the existing housing and the projected housing that was evaluated within the Final PEIR.

The Final PEIR concluded that the projected development of the Specific Plan Program would represent a nominal exceedance of the population and housing projections for full buildout of the Specific Plan Program. Therefore, the Specific Plan Program would not substantially induce additional population and housing growth that would result in significant impacts to the environment, and thus the Specific Plan Program would result in less than significant impacts.

The Final PEIR also concluded that the majority of the Specific Plan Program's projected job growth are expected to filled by persons outside of the Specific Plan Program area but within the County due to the transit-oriented development nature of the proposed Specific Plan Program, its accessibility to the Willowbrook/Rosa Parks Station and multiple freeways, and the larger available labor force within the County. Therefore, jobs created within the Specific Plan Program area are expected to be available for people living within the County and region without a substantial number of people requiring to migrate into the County and region and require new housing in addition to the available housing either within the Specific Plan Program area, the County or region. Therefore, the Specific Plan Program's increase in job growth would not substantially induce additional growth that would result in significant impacts to the environment and thus the Specific Plan Program would result in less than significant impacts.

Cumulative

The geographic context for an analysis of cumulative impacts would be Los Angeles County, which represents the planning area that includes the Specific Plan Program area and the overall population, housing and job projections for the County as a whole.

Past and present development projects have resulted in the population, housing inventory and non-residential growth that creates jobs that currently exist in the County. These existing developments are within SCAG's population, housing and job projections for the County. As development occurs within the County, SCAG works with the counties and cities to re-evaluate projected growth to ensure there is a balance in geographical areas so that overall projections are not exceeded. Therefore, the implementation of the proposed Specific Plan Program along with future growth projected by SCAG would not substantially induce growth that would result in significant impacts to the environment and thus the Specific Plan Program would result in less than significant impacts.

Because the implementation of the proposed Specific Plan Program would not substantially induce population, housing and job growth that would result in significant impacts to the environment, the Specific Plan Program's incremental contribution to environmental impacts associated with projected growth would be less than cumulatively considerable.

Proposed Project Evaluation

Proposed Project-Specific

The Final PEIR evaluated development throughout the Specific Plan Program area including the Project site that is located within Group Locations 3E and 3F. The Proposed Project includes the development of residential uses as well as various types of non-residential uses. As shown in **Table 3.14-3,** *Proposed Project Population and Employee Estimates Compared to Estimates Evaluated in Specific Plan Final Program EIR*, the Proposed Project includes the development of 559 residential units and 432,910 square feet of non-residential uses. The projected number of residents for the Proposed Project is 1,644 persons, and the Proposed Project is anticipated to include employment opportunities for approximately 150 employees. As shown in Table 3.14-3, the projected number of persons, housing units, residential population, non-residential development, and employees do not exceed the those evaluated within the Final PEIR. Therefore, the implementation of the Proposed Project would not induce unplanned population, housing or employment growth that could result in significant environmental impacts and thus the Specific Plan Program would result in less than significant impacts.

TABLE 3.14-3
PROPOSED PROJECT POPULATION AND EMPLOYEE ESTIMATES COMPARED TO ESTIMATES EVALUATED IN SPECIFIC PLAN FINAL PROGRAM EIR

Specific Plan Program Group Location # and Land Use	Population and Employee Estimates Evaluated in Specific Plan Final PEIR[a]	Proposed Project Population and Employee Estimates	Proposed Project Increase/Decrease Compared to Estimates Evaluated in Specific Plan Final PEIR
Group Locations 3E and 3F			
Residential (DU)	592	559	-33
Residential Population[b]	1,741	1,644	-98
Non-Residential (SF)	473,927	432,910[c]	-41,017
Employees[d]	1,019	150	-869

NOTES:

DU – Dwelling Unit

SF – Square Feet

a. See Table 2-1 in Section 2.4 of this Addendum to Final PEIR. The total development and estimated residential population within Groups 3E and 3F does not include the existing 106 residential units that encompass the entire area of Group 3F located outside the Project site.
b. Residential population is based on the County's average household size of 2.94 residents per dwelling unit identified within the Willowbrook Transit-Oriented District Specific Plan Final PEIR.
c. The Proposed Project includes a parking structure with 242,040 square feet that would not generate employment, and therefore, the Proposed Project's non-residential square footage that would generate employment is 290,870.
d. Employee estimates are based on the employee ratio per 1,000 square feet of non-residential uses. The Specific Plan Final PEIR identified a total of 2,666,035 square feet of non-residential use and identified a total of 5,632 employees which corresponds to 2.15 employee per 1,000 square feet of non-residential use. The 2.15 employees per 1,000 square feet ratio is used for the employee estimate. The employment estimate for the Proposed Project is estimated by the Project Applicant.

SOURCE: ESA, 2024

Cumulative

The geographic context for an analysis of cumulative impacts would be Los Angeles County, which represents the planning area that includes the Project site and the overall population, housing and job projections for the County as a whole.

Past and present development projects have resulted in the population, housing inventory and non-residential growth that creates jobs that currently exist in the County. These existing developments are within SCAG's population, housing and job projections for the County. As development occurs within the County, SCAG works with the counties and cities to re-evaluate projected growth to ensure there is a balance in geographical areas so that overall projections are not exceeded. Therefore, the implementation of the Proposed Project along with future growth projected by SCAG would not substantially induce growth that would result in significant impacts to the environment and thus cumulative development would result in less than significant impacts. Because the implementation of the Proposed Project would not substantially induce population, housing and job growth that would result in significant impacts to the environment, the Proposed Project's incremental contribution to environmental impacts associated with projected growth would be less than cumulatively considerable.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As identified in the above evaluation, the Proposed Project would include less housing units and non-residential uses (office and commercial) compared to the development evaluated in the Final PEIR. As with the Specific Plan Program, the Proposed Project would not substantially induce population, housing and job growth that would result in significant impacts on the environment and thus would result in less than significant impacts. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Displacement of People or Housing

Impact 3.14-2: The Specific Plan Program and Proposed Project would not displace or contribute to the cumulative displacement of substantial numbers of existing people or housing, especially affordable housing, necessitating the construction of replacement housing elsewhere.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Initial Study/Notice of Preparation and Final PEIR identified that the Specific Plan Program would not result in the permanent displacement of substantial number of existing housing, nor would it result in the displacement of substantial numbers of people. The proposed Specific Plan Program provides for infill development and redevelopment would include a mix of residential, commercial, industrial, and public uses. Build out of the Specific Plan Program area that was evaluated within the Final PEIR would provide 1,952 additional residential units within the Specific Plan Program area. Development projects implemented in accordance with the Specific Plan Program may result in temporary displacement of residents during construction activities. However, development projects would occur sporadically at a parcel by parcel project level, the potential displacement of persons residing on an infill or redevelopment parcel would be short-term, and the Specific Plan Program would result in an increase of 1,952 residential units to house residents of the area, and therefore, there would be no need for permanent replacement housing to be constructed outside of the Specific Plan Program area. Therefore, impacts related to displacement of housing or persons that would require replacement housing elsewhere would not occur.

Cumulative

The Final PEIR did not address the cumulative impact of permanently displacing a substantial number of existing housing or people with the implementation of the Specific Plan Program because the Specific Plan Program includes an increase of 1,952 residential units to house residents of the area. Therefore, the Specific Plan Program would not contribute to cumulative impacts associated with the substantial displacement of existing housing or people.

Proposed Project Evaluation

Proposed Project-Specific

The Project site does not include existing housing or people. Therefore, the implementation of the Proposed Project would result in no displacement impacts associated with housing or people.

Cumulative

Because the Project site does not include existing housing or people, the implementation of the Proposed Project would not contribute to potential cumulative impacts associated with the displacement of housing or people.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project would not result in the permanent displacement of substantial number of existing housing, nor would it result in the displacement of substantial numbers of people. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

3.14.6 References

SCAG. 2021. 6th Cycle Final RHNA Allocation, Methodology, and Regional Housing Determinations. Available at: https://scag.ca.gov/rhna. Accessed on August 22, 2024.

SCAG. 2024. The Southern California Association of Governments' 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy – Connect SoCal. Available at: https://scag.ca.gov/sites/main/files/file-attachments/23-2987-connect-socal-2024-final-complete-040424.pdf?1714175547. Accessed on August 13, 2024.

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3.15 Public Services

3.15.1 Introduction

This section addresses public services related to fire and police protection services, schools, parks, and other public facilities, as well as the potential of the Proposed Project to impact those services. This section includes a brief summary of the environmental setting included in the Final PEIR, and the identification of any applicable changes to the public service setting that may have occurred since the certification of the Final PEIR. In addition, a brief summary of the regulatory setting included in the Final PEIR and any substantive revisions to the regulatory setting that has occurred since the certification of the Final PEIR. This section also includes the thresholds of significance and a brief summary of new or physically altered governmental facilities impacts and mitigation measures addressed in the Final PEIR as well as the potential impacts associated with the Proposed Project. Finally, this section provides a conclusion of whether (1) the Proposed Project includes substantial changes that would require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact related to public services; (2) substantial changes in the circumstances under which the Proposed Project is undertaken would require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact related to public services; or (3) new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3) exist related to public services.

3.15.2 Environmental Setting

Fire Protection

The Los Angeles County Fire Department (LACFD) provides fire protection and emergency medical services throughout the unincorporated County areas, including Willowbrook. One LACFD Fire Station is located within the Specific Plan Program area; Station No. 41 is located at 1815 E. 120th Street. Station No. 41 is staffed with a 4-person assessment engine, which is an engine company with paramedic capabilities, and a 2-person paramedic squad. Station 41 is staffed with 1 captain, 1 firefighter specialist, 3 fire fighter/paramedics, and 1 fire fighter. The closest LACFD Fire Station outside of the Specific Plan Program area is Station No. 147, located at 3161 East Imperial Highway in Lynwood, 1 mile from the northeast boundary of the Specific Plan Program area. As stated in the Final PEIR, the response time to the project area from Fire Station No. 147 is approximately 7 minutes. Fire Station No. 147 contains a four-person quint, which provides a pump, water tank, fire hose, aerial device, and ground ladders. In addition, there are six other LACFD Fire Stations from the Specific Plan Program area that provide fire protection support.

Sheriff Protection Services

The Los Angeles County Sheriff's Department provides sheriff protection services and operates 23 stations throughout LA County. The station that serves the Specific Plan Program area is the Century Station, which is located at 11703 S. Alameda Street, Lynwood, CA 90262. The station

is located adjacent and east of the Specific Plan Program area (i.e., within 400 feet), and serves Lynwood, the unincorporated areas of Florence/Firestone Walnut Park, Athens Park, Rosewood, and Willowbrook. The station is located approximately 1.2 miles east of the Project site. The Century Station has 91.7 patrol personnel dedicated to the 119,933 residents that live in the unincorporated area that is served by the station, which equates to approximately 0.76 officers per 1,000 population.

Schools

The Specific Plan Program area is located within the Compton Unified School District (CUSD) and is currently served by six schools including Carver Elementary School, McNair Elementary School, Bunche Middle School, Willowbrook Middle School, Centennial High School, and Cesar Chavez High School. The Final PEIR identified that the CUSD has experienced a 26.74 percent decrease in enrollment between the year 2000 and 2015, and the enrollment of the schools serving the Specific Plan Program area is anticipated to continue to decrease through the 2021-2022 school years. However, in addition to the school that are in the CUSD, there are alternative and private schools within and in the vicinity of the Specific Plan Program area. These include the CDI Head Start Preschool, Nickerson Gardens Sage Center Day Car and the Watts Christian School for kindergarten and first grade. There is also one additional public schools within the Specific Plan Program area. The King-Drew Magnet High School is a Los Angeles Unified School District (LAUSD) alternative high school that serves students in the LAUSD boundary which is located west and north of the Specific Plan Program area. Based on the above, the Final PEIR concluded that the Specific Plan Program would have adequate schools serving the project. Since the certification of the Final PEIR, the Lincoln Elementary School has closed and discontinued and the onsite buildings have been removed. TheBarack Obama Charter School has been relocated from the Project site and the onsite buildings have been removed.

Parks and Recreation

The Willowbrook community is a fully developed and urbanized area that lacks natural open space. Open space within the community consists of developed parks that provide passive and active recreation and open space with approximately 147.97 total facility acreage.

The County of Los Angeles' goal for local parkland is 4.0 acres per 1,000 residents (County of Los Angeles 2015). The Final PEIR determined that the Willowbrook CDP had an estimated population of 20,685 in 2015. Based on the total facility acreage of 147.97 acres, there are approximately 7.2 acres of County parkland-per-1,000 population in the Willowbrook CDP [(147.97 total facility acreage ÷ 20,685 total population) x 100 = 7.2 acres (rounded)].

Total parks and recreation facility acreage has not changed since the certification of the Final PEIR. Based on a review of the 2020 Census, the community of Willowbrook increased in population to 24,295 persons (U.S. Census Bureau 2020). Based on the total recreational facilities within Willowbrook (197,97 acres), the Willowbrook Community provides approximately 6.1 acres of parkland per 1,000 persons. Therefore, the existing parks within the Willowbrook Community exceed the County's goal of 4.0 acres per 1,000 residents.

Libraries

The County of Los Angeles Library provides public library services to the Willowbrook community. The Specific Plan Program area is served by the Willowbrook Library, Compton Library, AC Bilbrew Library, and Lynwood Library. Since the certification of the Final PEIR, the County of Los Angeles Library continues to serve the Willowbrook community with the mentioned libraries. Due to the increasing resources being available online, the availability of high-speed internet services and a decrease in the need to physically visit a library, the County's library service needs are changing. The County provides thousands of online reference materials, books, magazines, music, videos, online learning resources, and a mobile library app. Thus, many of the library's resources can be obtained offsite (e.g. from home, work, or mobile internet device).

Other Public Facilities

In addition to fire, Sheriff, school, parks, and library facilities, there are typical urban public service facilities such as the MLK Medical Center within the Specific Plan Program area, and four U.S Post Offices near the Specific Plan Program area, including: one located at 2241 East El Segundo Boulevard, approximately 0.42 miles south of the Specific Plan Program area; one located at 12003 Avalon Boulevard, 1.12 miles west of the Specific Plan Program boundary; one located at 11200 Long Beach Boulevard, approximately 1.13 miles east of the Specific Plan Program boundary; and one located at 10301 Compton Avenue, approximately 0.90 miles north of the Specific Plan Program boundary. These public facilities currently exist and will continue to provide services to the Proposed Project.

3.15.3 Regulatory Setting

State

Senate Bill 50

Senate Bill (SB) 50, also known as the Leroy F. Greene School Facilities Act of 1998 (School Facilities Program), was originally established to streamline the state's school construction funding process (State of California 1998). The program provides grants to school districts to match local contributions for new construction and modernization projects, based on "unhoused pupils," from revenues obtained through the sale of State General Obligation Bonds when approved by voters in statewide elections. It provides funding for higher education facilities, K-12 facilities, modernization of older schools, additional funding for districts in hardship situations, and funding for class size reduction.

Quimby Act (Government Code 66477)

State Subdivision Map, Section 66477 (Quimby Act) allows the legislative body of a city or county, by ordinance, to require the dedication of land, the payment of applicable in-lieu fees, or a combination of both, for park and recreational purposes as a condition of approval for a final tract map or parcel map. The Quimby Act requires that developers set aside land, donate conservation easements, or pay applicable fees for park improvements. The goal of the Quimby Act is to require developers to help mitigate the impacts of development.

Local

Los Angeles General Plan Public Services and Facilities Element

The following General Plan policies for public services are relevant to the Proposed Project:

Sufficient Infrastructure

Policy 1.1: Discourage development in areas without adequate public services and facilities.

Policy 1.2: Ensure that adequate services and facilities are provided in conjunction with development through phasing or other mechanisms.

Policy 1.3: Ensure coordinated service provision through collaboration between County departments and service providers.

Policy 1.5: Focus infrastructure investment, maintenance and expansion efforts where the General Plan encourages development.

Educational Facilities

Policy 7.2: Proactively work with school facilities and education providers to coordinate land use and facilities planning.

Libraries

Policy 8.1: Ensure a desired level of library service through coordinated land use and facilities planning.

Policy 8.2: Support library mitigation fees that adequately address the impacts of new development.

Los Angeles County General Plan Safety Element

The following General Plan policies for safety are relevant to the Proposed Project:

Policy S 7.2: Support County emergency providers in reaching their response time goals.

Policy S 7.5: Ensure that there are adequate resources, such as sheriff and fire services, for emergency response.

Los Angeles County General Plan Parks and Recreation Element

The following General Plan policies for parks and recreation are relevant to the Proposed Project:

Policy 3.1: Acquire and develop local and regional parkland to meet the following County goals: 4 acres of local parkland per 1,000 residents in the unincorporated areas and 6 acres of regional parkland per 1,000 residents of the total population of Los Angeles County.

Policy 3.2: For projects that require zone change approvals, general plan amendments, specific plans, or development agreements, work with developers to provide for local and regional parkland above and beyond their Quimby obligations.

Policy 4.1: Create multi-use trails to accommodate all users.

Los Angeles County Fire Strategic Plan

In June 2011, the LA County Board of Supervisors approved the update to goals and actions to achieve the goals of the fire services within LA County. The overall strategic priority related to the proposed Specific Plan Program is to maximize the effectiveness of process, structure, and operations to support timely delivery of customer-oriented and efficient public services.

Los Angeles County Quimby Park Requirements

County Code Section 21.24.340 (Residential Subdivisions, Local Park Space Obligation, Formula) contains the methodology used to determine the amount of parkland required to be dedicated by the subdivider as a part of the subdivision map approval process. In accordance with Section 21.28.140, the developer may also be allowed to pay an applicable fee in-lieu of the provision of parkland. The County Code is applicable to new development requiring a subdivision map.

Willowbrook Community Parks and Recreation Plan

The Department of Parks and Recreation has completed the Community Parks and Recreation Plans to envision futures for the following six unincorporated communities in Los Angeles County: East Los Angeles, East Rancho Dominguez, Lennox, Walnut Park, West Athens-Westmont, and Willowbrook. As part of the public outreach process for the Willowbrook Community Parks and Recreation Plan, residents expressed the need for a wide variety of recreational amenities, including the following: exercise facilities, including new walking and running paths; play space for children; spaces for older youth, including sports facilities; gathering places for community and family events; an arts facility; a performance space; a splash pad; and an equestrian center, including stables, riding rings, equestrian trails; and green infrastructure.

Los Angeles Countywide Parks and Recreation Needs Assessment

Adopted by the Board of Supervisors on July 5, 2016, the Parks Needs Assessment engaged all communities within Los Angeles County in a collaborative process to gather data and input for future decision-making on parks and recreation. The primary goal of the Parks Needs Assessment was to quantify the magnitude of need for parks and recreational facilities and determine the potential costs of meeting that need. This goal has been accomplished, as evidenced by the final report which uses a transparent, best-practices approach to evaluate park and recreation needs and is the product of an engagement process that involved the public, cities, unincorporated communities, community-based organizations, and other stakeholders. Specifically, the Parks Needs Assessment:

- Uses a set of metrics to measure and document park needs for each study area;
- Establishes a framework to determine the overall level of park need for each study area;
- Offers a list of priority park projects for each study area;
- Details estimated costs for the priority park projects by study area;

- Builds a constituency of support and understanding of the park and recreational needs and opportunities; and
- Informs future decision-making regarding planning and funding for parks and recreation.

Los Angeles Countywide Parks Needs Assessment Plus

Adopted by the Board of Supervisors on December 6, 2022, the Parks Needs Assessment Plus (PNA+) is an updated update on the 2016 Los Angeles Countywide Comprehensive Parks and Recreation Needs Assessment (PNA) and serves as the County's 30x30 strategy for land conservation and restoration. This report builds on the PNA by providing a more in-depth and nuanced understanding of 1) the distribution of environmental benefits and burdens within the County, 2) park access and need considerations for regional parks and open spaces and 3) park needs that are specific to the rural areas of the County.

The Proposed Project is located within the unincorporated Willowbrook Community, which contains six County parks maintained and operated by the Department of Parks and Recreation.

Los Angeles County Park Safe Neighborhood Parks Proposition of 1992, 1996, Proposition A

The Safe, Clean Neighborhood Parks & Beaches Measure (Measure A) was approved by voters in 2016. This measure will replace expiring, voter-approved funding with new funding for parks, beaches, recreation and open spaces; and generate approximately $92.7 million per year. Funding from the measure will be used to upgrade playground equipment, parks, recreation centers and senior centers; provide children in our community safe places to play and opportunities to participate in after school programs in parks and recreation centers; allow for implementation of drought-tolerant plants and use of recycled water and rainwater to reduce the amount of water wasted; and help protect and preserve undeveloped natural areas for future generations.

3.15.4 Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines and the County of Los Angeles Environmental Checklist Form, the project could have a significant on public services if it would:

- Create capacity or service level problems or result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:
  - Fire Protection (see Impact 3.15-1)
  - Sheriff Protection (see Impact 3.15-2)
  - Schools (see Impact 3.15-3)
  - Parks (See Impact 3.15-4)
  - Libraries (See Impact 3.15-5)
  - Other Public Facilities (See Impact 3.15-6)

3.15.5 Impact Analysis

Fire Protection

Impact 3.15-1: The Specific Plan Program and the Proposed Project would not result in impacts or contribute to cumulative impacts from construction activities associated with fire protection facilities because the Specific Plan Program and the Proposed Project would not require the provision of new or physically altered fire protection facilities to maintain acceptable service ratios, response times, or other performance objectives for fire services.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Specific Plan Program area would be served by LACFD Fire Station No. 41, located within the Specific Plan Program area, and six other LACFD Fire Stations within a 4.5-mile radius, as shown in Figure 3.15-1. The Final PEIR evaluated the addition of approximately 5,739 residents and 5,632 jobs generated by the Specific Plan Program. As development gradually occurs, this increase in residents and employees could result in additional calls for fire department services The fire department would add staff and equipment to the existing stations on an as-needed basis in order to accommodate these increased demands. Additionally, the infill development would comply with the County Municipal Code by implementing fire detection and suppression systems, emergency access, and properly placed fire hydrants as required to reduce future demand on fire protection services. Based on the large number of existing LACFD Fire Stations in the Willowbrook community and project design elements incorporated throughout the infill development within the Specific Plan Program area, the Specific Plan Program would not require provision of new or physically altered fire protection facilities construction of which could cause significant environmental impacts. Therefore, the Specific Plan Program would not result in impacts related to fire protection services.

Cumulative

The geographic context for cumulative fire protection and emergency services is the typical service areas of the primary fire stations that are serving the Specific Plan Program area. Numerous cumulative development projects are anticipated to occur within the Specific Plan vicinity throughout the development period of the Specific Plan Program, which would generate demand for additional fire protection and emergency medical services. Like the Specific Plan Program, the related projects would be reviewed by County Fire Department staff prior to permit approval and would be required to implement fire protection design features per the California Building Code and Los Angeles County Fire Code (Chapter 12.14 of the County Municipal Code), which would reduce potential fire hazards. Because the cumulative area is urban and developed and contains one fully staffed fire station and six additional stations within a 4.5-mile radius of the Specific Plan Program area, and future cumulative development projects would consist of redevelopment or infill development of new uses that would be required to meet current fire codes. Thus, cumulative development would not result in physical environmental impacts related to the need to provide additional facilities for fire protection services. Therefore, the Specific Plan Program would not result in impacts and would not contribute to cumulative impacts associated with fire protection services.

Proposed Project Evaluation

Proposed Project-Specific

Similar to the Specific Plan Program, the Proposed Project represents infill development on the Project site that would generate residents and jobs, requiring fire protection services. The LACFD continues to serve the Willowbrook community. As mentioned above, LACFD Fire Station No. 41 serves the Project site. Additionally, the closest LACFD Fire Station outside of the Project site is Fire Station No. 147. As with the Specific Plan Program, the Proposed Project would introduce residents and employees; however, the Proposed Project would introduce approximately 1,644 residents and generate approximately 150 jobs resulting in less development than evaluated within the Final PEIR for the Project site. The increase in population would result in an increase in the potential for fire service demands within the Project site. However, as with the Specific Plan Program, the Proposed Project infill development would require incorporation of fire detection and suppression systems (fire alarms and sprinklers), emergency access (fire lanes), and properly placed fire hydrants as required by the Los Angeles County Fire Code (Chapter 12.14 of the County Municipal Code). Based on existing LACFD Fire Stations serving the Project site, implementation of the project design elements, and compliance with the County Code to incorporate elements to reduce fire hazards, the Proposed Project would not require provision of new or physically altered fire protection facilities construction of which could cause significant environmental impacts. Therefore, the Proposed Project would not result in impacts related to fire protection services.

Cumulative

As with the Specific Plan Program, the Proposed Project would generate growth within the service areas of the fire protection agencies. The population generated by the Proposed Project would not be substantial as to require expansion of servicing facilities, construction of a new fire station, or expansion of a new fire station. The implementation of cumulative projects could increase the residential population that could require the construction or expansion of a fire facility. However, based on existing fire stations serving the Project site and implementation of project design elements to reduce fire hazards, the Proposed Project would not result in impacts and would not contribute to cumulative impacts associated with fire protection services.

Applicable Mitigation Measures for Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the implementation of the Proposed Project would not impact fire protection resources. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Sheriff Protection

Impact 3.15-2: The Specific Plan Program and the Proposed Project would not result in impacts or contribute to cumulative impacts from construction activities associated with sheriff protection facilities because the Specific Plan Program and the Proposed Project would not require the provision of new or physically altered sheriff protection facilities to maintain acceptable service ratios, response times, or other performance objectives for sheriff services.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Final PEIR evaluated the addition of 1,952 residential units that would house approximately 5,739 persons, and approximately 2,666,035 square feet of non-residential uses that would generate approximately 5,362 jobs. This development within the Specific Plan Program area would result in additional calls for sheriff services. As mentioned above, the Willowbrook community is served by the Los Angeles County Sherriff's Department. The Specific Plan Program area is served by the Century Sheriff's Station, located at 11703 S. Alameda Street, Lynwood, CA 90262. The Century Sheriff's Station has approximately 91.7 patrol personnel dedicated to the 119,933 residents, which equates to approximately 0.76 officers per 1,000 population. As described in the County's General Plan EIR, an office-to-population ratio of one office to every 1,000 residents provides the desired level of service for its service area. However, the Sheriff's Department has an optimal service response time of 10 minutes or less for emergency response incidents (a crime that is presently occurring and is a life or death situation), 20 minutes or less for priority response incidents (a crime or incident that is currently occurring, but which is not a life or death situation), and 60 minutes or less for routine response incidents (a crime that has already occurred and is not a life or death situation). The average response times in 2015 for service to the Century Station were 4.1 minutes for emergency calls; 8.3 minutes for priority calls; and 34.8 minutes for routine calls for service. Thus, the existing services provided by the Sheriff's Century Station are well within the established response time goals.

Based on the above, the Specific Plan Program would not require provision of new or physically altered police protection facilities construction of which could cause significant environmental impacts. Therefore, the Specific Plan Program would not result in impacts related to police protection services.

Cumulative

The geographic context for cumulative police services is the service area of the Sheriff's Century Station, which serves the Specific Plan Program area. Numerous cumulative development projects are anticipated to occur within the development period of the Specific Plan Program, which would generate additional calls for sheriff services. The related projects would be reviewed by County and Sheriff Department staff prior to the developer's receipt of permits to ensure that appropriate security measures are included in each development, which would reduce the cumulative need for sheriff services to a level that could be accommodated by existing facilities. Overall, as described by the County General Plan, projected growth in the County is not anticipated to result in the need for new or expanded sheriff facilities in the portion of the County

including the Specific Plan Program area, and the existing facilities would be able to accommodate buildout of the Specific Plan Program. Therefore, cumulative development would not result in physical environmental impacts related to sheriff services and cumulative impacts would be less than significant.

Proposed Project Evaluation

Proposed Project-Specific

Similar to the Specific Plan Program, the Proposed Project represents infill development on the Project site that would generate residents and jobs, requiring police protection services. The Sherriff's Department continues to serve the Willowbrook community. As mentioned above, Century Sheriff's Station serves the Project site. As with the Specific Plan Program, the Proposed Project would introduce residents and employees; however, the Proposed Project would introduce approximately 1,644 residents and generate approximately 150 jobs resulting in less development than evaluated within the Final PEIR for the Project site. The increase in population as a result of the Proposed Project would result in an increase in the potential for police protection services within the Project site. However, as with the Specific Plan Program, the Proposed Project infill development would require incorporation of security measures which would reduce the need for Sheriff services. In addition, CDU would extend their existing security services to its proposed facilities. These security services include full-time security officers, emergency call boxes, emergency towers, emergency public address system, campus safety officer escorts, and shuttle services to the Willowbrook Transit Station. Since the Century Sheriff's Station is located approximately 1.2 miles from the Project site and the proposed development would incorporate security measures to reduce sheriff services, the Proposed Project would not require provision of new or physically altered police protection facilities construction of which could cause significant environmental impacts. Therefore, the Proposed Project would not result in impacts related to police protection services.

Cumulative

As with the Specific Plan Program, the Proposed Project would generate growth within the service areas of the Sherriff's Department. The population generated by the Proposed Project would not be substantial as to require expansion of servicing facilities construction or expansion of a new sheriff station. In addition, CDU's existing security services would extend the its proposed facilities. The implementation of cumulative projects could increase the residential population that could require the construction or expansion of a sheriff station. However, since the Century Sheriff's Station serves and is located approximately 1.2 miles from the Project site and security measures would be implemented to reduce the need for sheriff services, the Proposed Project's contribution to police service impacts would not result in impacts, and the Proposed Project would not contribute to cumulative impacts associated with police protection services.

Applicable Mitigation Measures for Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the implementation of the Proposed Project would not impact police protection resources. Therefore, the Proposed Project would not result in any new

substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Schools

Impact 3.15-3: The Specific Plan Program and the Proposed Project would not result in impacts or contribute to cumulative impacts from construction activities associated with schools because the Specific Plan Program and the Proposed Project would not require the provision of new or physically altered schools to maintain acceptable service ratios, response times, or other performance objectives for schools.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Final PEIR evaluated the addition of approximately 1,366 additional students associated with the Specific Plan Program. As mentioned above, the Compton USD has experienced a 26.74 percent decrease in enrollment over the last 15 years, and the enrollment of the schools serving the Specific Plan Program area is anticipated to continue to decrease. The difference in the anticipated decrease in students by 2022 projected by the Compton USD and the increase in students that would result from buildout of the Specific Plan Program is 809 students. Hence, the schools serving the Specific Plan Program area would need to accommodate 809 more students than are currently accommodated. Due to the District's expected decline of 2,511 students by 2022 throughout the District, the additional 809 students generated in the Specific Plan Program area could be accommodated by schools within the District. Thus, it is anticipated that the existing schools serving the Specific Plan Program area would continue to provide services, and the CUSD would be able to accommodate the additional students from buildout of the Specific Plan Program.

SB 50 prohibits the denial of a land use application because of school capacity and specifically establishes a mandated fee. Government Code Section 65995 authorizes school districts to collect fees on future development based on the fee structure developed at the time of building permit issuance.

Payment of development impact fees, as required by Government Code Section 65995 to CUSD may be required for each development project, which would provide for funding of new facilities so that impacts related to the provision of school services would not occur. Based on the above, the Specific Plan Program would not require provision of new or physically altered school facilities, construction of which could cause significant environmental impacts. Therefore, the Specific Plan Program would not result in impacts related to school facilities.

Cumulative

The geographic context for cumulative school services is the area served by the CUSD. Numerous cumulative development projects are anticipated to occur throughout the CUSD service area as development occurs in accordance with the Specific Plan Program. The area served by CUSD is anticipated to result in an increase in population, which would generate additional needs for public school classroom seating capacity in local schools. However, as described previously, the school district's overall enrollment has declined, and it is anticipated that existing schools would have adequate capacity to serve the Specific Plan Program area. All new private development may be required to pay applicable statutory impact fees in accordance with Government Code Section 65995(b) to the CUSD to help fund facility improvements and offset any additional increases in education demand at schools. Because these fees are required by law, the payment of applicable fees would provide funding for needed school facilities and would reduce potential impacts to existing school facilities from implementation of the Specific Plan Program. Given the payment of applicable fees, the cumulative impact of cumulative development on public schools would be less than significant. Because the Specific Plan Program and cumulative projects would result in no impacts on public schools, the Specific Plan Program would not contribute to cumulative impacts on public schools

Proposed Project Evaluation

Proposed Project-Specific

Similar to the Specific Plan Program, the Proposed Project would introduce residents and employees; however, the Proposed Project would introduce approximately 1,644 residents and generate approximately 150 jobs resulting in less development than evaluated within the Final PEIR for the Project site. In addition, because approximately 45 percent of the residential units proposed on the Project site would be for CDU students who would not be generating school-aged children, the Proposed Project would further reduce its demand on CUSD schools. Due to the minimal increase in the number of residents who could reside with children on the Project site, continued reduced enrollment at CUSD, and the payment of applicable fees in accordance with SB 50, the implementation of the Proposed Project would not result in the need to construct new school facilities. Therefore, the Proposed Project would not result in environmental impacts due to the construction of new school facilities.

Cumulative

As with the Specific Plan Program, the Proposed Project would generate growth within the service area of the CUSD. The population generated by the Proposed Project would not be substantial as to require expansion of servicing facilities construction or expansion of new school facilities due to existing CUSD enrollment decrease and payment of applicable development impact fees. The implementation of cumulative projects could increase the residential population; however, due to declining enrollment within CUSD, there would not be a need for the construction or expansion of a new school. Therefore, cumulative development would not result in impacts to schools. Because the Proposed Project would result in the nominal increase of school-age children, and the Proposed Project would not result in the need for the construction or expansion of new schools, the Proposed Project would not contribute to cumulative impacts to schools.

Applicable Mitigation Measures

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the implementation of the Proposed Project would not impact school facilities due to the current decrease in CUSD enrollment and payment of applicable development impact fees to the CUSD. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Parks

Impact 3.15-4: The Specific Plan Program and the Proposed Project would not result in impacts or contribute to cumulative impacts from construction activities associated with parks because the Specific Plan and Proposed Project would not require the provision of new or physically altered parks to maintain acceptable service ratios, response times, or other performance objectives for parks.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Final PEIR identified that the Specific Plan Program would result in an increase in population of approximately 5,739 residents (assuming no vacancy). As described above, the Willowbrook Community currently meets and exceeds the County goal for parks (i.e. greater than the 4.0 acres of parkland per 1,000 residents). With the Final PEIR's's projected increase of 1,952 residential units and a corresponding population of approximately 5,739 residents, the amount of parkland within the Willowbrook Community would still be adequate to serve the new residents. The implementation of the Specific Plan Program would result in a parkland to population ratio of 5.63 acres of County parkland per 1,000 residents, which is above the County's goal to provide four acres of parkland per 1,000 residents. Therefore, the implementation of the Specific Plan Program would not result in the need for new or physically altered parks to maintain acceptable service, and therefore, impacts would not occur.

Cumulative

As described above, the Willowbrook community currently provides 7.15 acres of County parkland per 1,000 population, and the County's planning service goal is to provide 4.0 acres of local parkland per 1,000 residents. Related projects throughout the Willowbrook community would reduce the amount of acreage per population. Assuming the Willowbrook community area grows proportionally with the Metro Area (Outside Community-Based Plan) as provided in the County of Los Angeles General Plan EIR, the Willowbrook community would increase in population by 27.6 percent from the current population of 20,685 to 26,394. With the addition of the proposed Specific Plan Program, the Willowbrook community would have a buildout

population of 32,172. Assuming the Willowbrook community contains the existing 147.97 parkland acres, this parkland would provide 4.6 acres per 1,000 residents at buildout of the Willowbrook community and the buildout of the Specific Plan Program. Therefore, cumulative growth would result in less than significant cumulative environmental impacts related to park and recreation facilities. Because the Specific Plan Program would not cause environmental impacts to park and recreational facilities, the Specific Plan Program would not contribute to cumulative environmental impacts associated with the need for new or physically altered parks.

Proposed Project Evaluation

Proposed Project-Specific

The Proposed Project would result in an increase in population of approximately 1,644 residents. Because the Proposed Project would result in fewer residential units compared to the number of residential units evaluated within the Final PEIR for the Project site (as discussed in Section 2), the Proposed Project would result in less demand and impacts on park facilities compared to the Specific Plan Program. The Willowbrook Community currently meets and exceeds the County goal for parks (i.e. greater than the 4.0 acres of parkland per 1,000 residents) even with the implementation of the Proposed Project. The Proposed Project would not require the construction or expansion of park facilities that could result in adverse impacts to service levels. The Proposed Project includes the construction of an athletic field that would primarily be used as a soccer field but could serve as a multi-purpose and functional space for other recreational and sports uses. The Proposed Project also includes an athletic building that would include a swimming pool, basketball court, exercise rooms, walk/run track, and associated support facilities. When not in use by CDU, the athletic field and uses within the athletic building may be scheduled for use by the public. This use may be pursuant to an appropriate use agreement and subject to CDU's hours of operation, which may be no earlier than 6:00 am and no later than 11:00 pm. Overall, the implementation of the Proposed Project would expand access to recreational facilities and not result in park impacts associated with service levels.

Cumulative

The implementation of cumulative projects could increase the residential population which could require the construction or expansion of a new park. However, since the Proposed Project includes recreational facilities and the existing parkland in the Willowbrook community would be adequate to accommodate future population in the area, the Proposed Project would not contribute to potential cumulative impacts to park service levels.

Applicable Mitigation Measures

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the implementation of the Proposed Project would not impact parks due to sufficient parkland provided in the Willowbrook community. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial

importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Libraries

Impact 3.15-5: The Specific Plan Program and Proposed Project would not result in impacts or contribute to cumulative impacts from construction activities associated with libraries because the Specific Plan Program and the Proposed Project would not require the provision of new or physically altered libraries to maintain acceptable service ratios, response times, or other performance objectives for libraries.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

As evaluated in the Final PEIR, the addition of 5,739 new residents within the Specific Plan Program area is anticipated to increase demand for library services and facilities. However, based on the widespread use of the internet by people of Los Angeles County, it is reasonable to assume that many of the residential units could be equipped with internet access, which provides access to many of the same resources provided by the library and would limit the increased need for library services and resources. Thus, the existing four County library facilities would be able to accommodate the increased demand from the addition of 5,739 residents from buildout of the Specific Plan Program area. Thus, new residential uses in the Specific Plan Program area do not immediately equate to an increased need for library resources/services or square footage of library space. Therefore, impacts on library services associated with implementation of the Specific Plan Program would not occur.

Cumulative

The geographic scope for cumulative library services is the portions of the County of Los Angeles that are utilizing the four libraries serving the Specific Plan Program area. As described previously, library usage has been changing with the advent of increasing resources being available online and the availability of high-speed internet services. Therefore, new development results in a limited need for library resources/services or square footage of library space. However, cumulative increases in population growth over time could increase the demand for library services. Although library use would be expected to incrementally increase from demand by cumulative developments, there are four existing libraries serving the Specific Plan Program area that would be able to meet the increased need. Therefore, no impacts from cumulative projects associated with library services would occur. Because the Specific Plan Program would not impact library services, the Specific Plan Program would not contribute to cumulative environmental impacts associated with library services.

Proposed Project Evaluation

Proposed Project-Specific

Similar to the Specific Plan Program, the Proposed Project would result in an increase in population necessitating library services. However, with the advent of increasing library resources being available online and the availability of high-speed internet services, many of the

library's resources can be obtained offsite. As mentioned above, the Project site would be served by four existing libraries in the Willowbrook community that would have adequate capacity to serve the estimated growth generated by the Proposed Project. In addition, the CDU students would be served by the on-campus CDU library. Furthermore, the Proposed Project includes fewer residents than evaluated in the Final PEIR for the Project site. Therefore, impacts on library services associated with implementation of the Proposed Project would not occur.

Cumulative

As with the Specific Plan Program, the Proposed Project would generate growth requiring use of library services. The population generated by the Proposed Project would not be substantial as to require expansion of servicing facilities construction or expansion of library facilities and resources as it is assumed that estimated growth would have access to high speed internet where library resources can be obtained offsite. The implementation of cumulative projects could increase the residential population which could require the construction or expansion of a new library. However, since the Proposed Project growth is not substantial as to require the need of a new library and library resources can be obtained offsite with the use of high-speed internet, the Proposed Project would not contribute to potential cumulative impacts to library services.

Applicable Mitigation Measures

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the implementation of the Proposed Project would not impact library services. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Other Public Facilities

Impact 3.15-6: The Specific Plan Program and the Proposed Project would not result in impacts or contribute to cumulative impacts from construction activities associated with other public facilities because the Specific Plan Program and the Proposed Project would not require the provision of new or physically altered other public facilities to maintain acceptable service ratios, response times, or other performance objectives for other public facilities.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

As evaluated in the Final PEIR, there are no other public facilities that are related to implementation of the Specific Plan Program. The Specific Plan Program area is served by MLK Medical Center and several post offices, neither of which would need to be physically altered to serve the additional 5,739 new residents within the Specific Plan Program area. Also, as

described above, there are four U.S Post Offices within 1.13 miles of the Specific Plan Program area. These existing post office facilities would be able to accommodate the additional mail volume to the 1,952 residential units that are estimated to be developed at buildout in accordance with the Specific Plan Program. Since the Specific Plan Program would implement redevelopment and infill development within the urban area that is already served by developed service infrastructure, as directed by the County General Plan's policies, the Specific Plan Program would not require development of other public service facilities, the construction of which could cause significant environmental impacts. Therefore, environmental impacts associated with other public services from implementation of the Specific Plan Program would not occur.

Cumulative

The geographic scope for cumulative hospital and post office services is the portions of the County of Los Angeles that are utilizing the hospital and post offices that serve the Specific Plan Program area. Cumulative development would increase the population and need for hospital and post office services; however, because the cumulative projects would implement redevelopment and infill development within the urban area, no substantial increase in the demand for hospital and post office services would occur. Therefore, cumulative development would result in less than significant cumulative impacts on other public services such as hospital and post office services. Because the Specific Plan Program would not require the development of other public services such as hospital and post office services, the Specific Plan Program would not contribute to cumulative impacts on other public services.

Proposed Project Evaluation

Proposed Project-Specific

As mentioned above, the Project site is served by MLK Medical Center and several post offices, neither of which would need to be physically altered to serve the projected addition of 1,644 new residents generated by the Proposed Project. Also, as described above, there are four U.S Post Offices within 1.13 miles of the Project site which would continue to be able to accommodate the additional mail volume to the Proposed Project residents. Therefore, impacts to library services associated with implementation of the Proposed Project would not occur.

Cumulative

The implementation of cumulative projects could increase the residential population which could require the construction or expansion of other public facilities such as hospitals or post offices. However, since the Proposed Project growth is not substantial as to require the need of other public facilities, the Proposed Project would not contribute to potential cumulative impacts to other public services.

Applicable Mitigation Measures for Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the implementation of the Proposed Project would not impact other public services due to the estimated growth and existing public facilities serving the

Willowbrook community and Project site. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

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3.16 Recreation

3.16.1 Introduction

This section addresses recreation facilities related to physical deterioration, construction, or expansion, and the potential of the Proposed Project to result in environmental impacts. This section includes a brief summary of the environmental setting included in the Final PEIR, and the identification of any applicable changes to the recreational setting that may have occurred since the certification of the Final PEIR. In addition, a brief summary of the regulatory setting included in the Final PEIR and any substantive revisions to the regulatory setting that has occurred since the certification of the Final PEIR. This section also includes the thresholds of significance and a brief summary of the recreational impacts and mitigation measures addressed in the Final PEIR, as well as the potential for recreational impacts associated with the Proposed Project. Finally, this section provides a conclusion of whether (1) the Proposed Project includes substantial changes that would require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact related to recreation; (2) substantial changes in the circumstances under which the Proposed Project is undertaken would require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact related to recreation; or (3) new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3) exist related to recreation.

3.16.2 Environmental Setting

The Willowbrook community is a fully developed and urbanized area that lacks natural open space. Open space within the community consists of developed parks that provide passive and active recreation and open space areas.

There are three parks located within the Specific Plan Program area, and four additional parks that are located within the Willowbrook community. **Table 3.16-1,** *Parks within the Willowbrook Community*, provides an overview of these parks. As shown, there are currently 147.97 acres of parkland within the Willowbrook community.

The County of Los Angeles' goal for local parkland is 4.0 acres per 1,000 residents (County of Los Angeles 2015). As described in the Final PEIR, the Willowbrook Community had an estimated population of 20,685 in 2015. Based on the total facility acreage of 147.97 acres, there are approximately 7.2 acres of County parkland-per-1,000 population in the Willowbrook CDP [(147.97 total facility acreage ÷ 20,685 total population) x 100 = 7.2 acres (rounded)].

TABLE 3.16-1
PARKS WITHIN THE WILLOWBROOK COMMUNITY

Name and Address	Park Facilities	Location Relative to Specific Plan Program	Facility Acreage
Mona Park 2291 E 121st Street	baseball/softball field ,children's play area, community room, gymnasium, kitchen, basketball court, restrooms, picnic shelter, swimming pool	Within Specific Plan Program area	7.8
MLK Fitness Center 11833 South Wilmington	Fitness stations, picnic tables, walking path	Within Specific Plan Program area	0.13
Faith and Hope Park 2247 E 119th Street	walking path, open lawn, trees and native plant landscaping	Within Specific Plan Program area	0.46
George Washington Carver Park 1400 E. 118th Street	arts and crafts room, lighted baseball/ softball fields, multi-purpose field, multi-purpose room, picnic areas with barbecues, swimming pool,	0.20 mile east of Specific Plan Program area	7.07
Magic Johnson Park 905 E El Segundo Boulevard	children's play areas, picnic areas with barbecues, restrooms, soccer fields, two fishing lakes, walking path	0.60 mile east of Specific Plan Program area	103.79
Enterprise Park 13055 Clovis Avenue	children's play area, community room, gymnasium, lighted baseball/ softball fields, multi-purpose field, picnic areas with barbecues, swimming pool	0.75 mile southeast of Specific Plan Program area	10.02
Athens Park 12603 S. Broadway Avenue	community building, computer lab, fitness area, gymnasium, lighted baseball/ softball fields, lighted basketball courts, multi-purpose field, multi-purpose room, picnic areas with barbecues, restrooms, skate park. swimming pool	1.80 mile west of the Specific Plan Program area	18.7
Total County Facility Acreage			**147.97**

SOURCE: County of Los Angeles Department of Parks and Recreation, 2016

Total parks and recreation facility acreage has not changed since the certification of the Final PEIR. Based on a review of the 2020 Census, the community of Willowbrook increased in population to 24,295 persons (U.S. Census Bureau 2020). Based on the total recreational facilities within Willowbrook (197,97 acres), the Willowbrook Community provides approximately 6.1 acres of parkland per 1,000 persons. Therefore, the existing parks within the Willowbrook Community exceed the County's goal of 4.0 acres per 1,000 residents.

The County of Los Angeles' goal for local parkland is 4.0 acres per 1,000 residents (County of Los Angeles 2015). As described in the Final PEIR, the Willowbrook Community had an estimated population of 20,685 in 2015. Based on the total facility acreage of 147.97 acres, there are approximately 7.2 acres of County parkland-per-1,000 population in the Willowbrook CDP [(147.97 total facility acreage ÷ 20,685 total population) x 100 = 7.2 acres (rounded)].

Total parks and recreation facility acreage has not changed since the certification of the Final PEIR. Based on a review of the 2020 Census, the community of Willowbrook increased in population to 24,295 persons (U.S. Census Bureau 2020). Based on the total recreational facilities

within Willowbrook (197,97 acres), the Willowbrook Community provides approximately 6.1 acres of parkland per 1,000 persons. Therefore, the existing parks within the Willowbrook Community exceed the County's goal of 4.0 acres per 1,000 residents.

3.16.3 Regulatory Setting

State

The Quimby Act (Government Code Section 66477)

State Subdivision Map, Section 66477 (Quimby Act) allows the legislative body of a city or county, by ordinance, to require the dedication of land, the payment of applicable in-lieu fees, or a combination of both, for park and recreational purposes as a condition of approval for a final tract map or parcel map. The Quimby Act requires that developers set aside land, donate conservation easements, or pay applicable fees for park improvements. The goal of the Quimby Act is to require developers to help mitigate the impacts of development.

Local

Los Angeles County Quimby Park Requirements

County Code Section 21.24.340 (Residential Subdivisions, Local Park Space Obligation, Formula) contains the methodology used to determine the amount of parkland required to be dedicated by the subdivider as a part of the subdivision map approval process. In accordance with Section 21.28.140, the developer may also be allowed to pay an applicable fee in-lieu of the provision of parkland. The County Code is applicable to new development requiring a subdivision map.

Los Angeles Countywide Parks and Recreation Needs Assessment

Adopted by the Board of Supervisors on July 5, 2016, the Parks Needs Assessment was a historic and significant undertaking to engage all communities within Los Angeles County in a collaborative process to gather data and input for future decision-making on parks and recreation. The primary goal of the Parks Needs Assessment was to quantify the magnitude of need for parks and recreational facilities and determine the potential costs of meeting that need. This goal has been accomplished, as evidenced by the final report which uses a transparent, best-practices approach to evaluate park and recreation needs and is the product of an engagement process that involved the public, cities, unincorporated communities, community-based organizations, and other stakeholders. Specifically, the Parks Needs Assessment:

- Uses a set of metrics to measure and document park needs for each study area;
- Establishes a framework to determine the overall level of park need for each study area;
- Offers a list of priority park projects for each study area;
- Details estimated costs for the priority park projects by study area;
- Builds a constituency of support and understanding of the park and recreational needs and opportunities; and
- Informs future decision-making regarding planning and funding for parks and recreation.

Los Angeles Countywide Parks Needs Assessment Plus

Adopted by the Board of Supervisors on December 6, 2022, the Parks Needs Assessment Plus (PNA+) is an update on the 2016 Los Angeles Countywide Comprehensive Parks and Recreation Needs Assessment (PNA) and serves as the County's 30x30 strategy for land conservation and restoration. This report builds on the PNA by providing a more in-depth and nuanced understanding of (1) the distribution of environmental benefits and burdens within the County, (2) park access and need considerations for regional parks and open spaces, and (3) park needs that are specific to the rural areas of the County.

The Proposed Project is located within the unincorporated Willowbrook Community, which contains six County parks maintained and operated by the Department of Parks and Recreation.

Los Angeles County Park Safe Neighborhood Parks Proposition of 1992, 1996, Proposition A

The Safe, Clean Neighborhood Parks & Beaches Measure (Measure A) was approved by voters in 2016. This measure will replace expiring, voter-approved funding with new funding for parks, beaches, recreation and open spaces; and generate approximately $92.7 million per year. Funding from the measure will be used to upgrade playground equipment, parks, recreation centers and senior centers; provide children in our community safe places to play and opportunities to participate in after school programs in parks and recreation centers; allow for implementation of drought-tolerant plants and use of recycled water and rainwater to reduce the amount of water wasted; and help protect and preserve undeveloped natural areas for future generations.

Los Angeles County General Plan Parks and Recreation Element

The Parks and Recreation Element of the General Plan provides the following policies potentially relevant to the Project:

> ***Policy P/R 1.2:*** Provide additional active and passive recreation opportunities based on a community's setting, and recreational needs and preferences.
>
> ***Policy P/R 1.3:*** Consider emerging trends in parks and recreation when planning for new parks and recreation programs.
>
> ***Policy P/R 3.1:*** Acquire and develop local and regional parkland to meet the following County goals: four acres of local parkland per 1,000 residents in the unincorporated areas and six acres of regional parkland per 1,000 residents of the total population of the County.
>
> ***Policy P/R 3.2:*** For projects that require zone change approvals, general plan amendments, specific plans, or development agreements, work with developers to provide for local and regional parkland above and beyond their Quimby obligations.

3.16.4 Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines and the County of Los Angeles Environmental Checklist Form, the project could have a significant impact on recreation if it would:

- Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration would occur or be accelerated (see Impact 3.16-1, below).
- Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment (see Impact 3.16-2, below).

3.16.5 Impact Analysis

Increase Use of Recreational Facilities

Impact 3.16-1: The Specific Plan Program and Proposed Project would result in less than significant and less than cumulatively considerable impacts from increased use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration would occur or be accelerated.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Final PEIR identified that approximately 147.97 acres of County parkland are within the Willowbrook community, based on a 2015 population of 20,685 residents. This provides 7.2 acres of County parkland per 1,000 residents. The increase in population from buildout of the proposed Specific Plan Program would reduce the park acreage to 5.63 acres of County parkland per 1,000 residents, which is above the County's goal to provide four acres of parkland per 1,000 residents (County of Los Angeles 2015). Therefore, based on the County's planning criteria and, buildout of the Specific Plan Program would not result in the substantial acceleration of physical deterioration of park and recreation facilities.

Additionally, as described in the County General Plan EIR, enforcement of the General Plan goal of four acres of local parkland for every 1,000 residents as a condition of approval where an appropriate nexus exist would serve to reduce the potential for deterioration of facilities by allowing for new facilities and adequate funding. Therefore, implementation of the proposed Specific Plan Program would result in less than significant impacts related to physical deterioration of existing park and recreation facilities.

Cumulative

As described in the Final PEIR, the Willowbrook community currently provides 7.15 acres of County parkland per 1,000 population, and the County's planning service goal is to provide 4.0 acres of parkland per 1,000 residents. Cumulative development throughout the Willowbrook community would reduce the amount of acreage per 1,000 residents to 4.6 and increase the use of existing facilities. Because cumulative development would not reduce the amount of parkland to less than the goal of 4.0 acres per 1,000 residents, impacts from cumulative development would

be less than significant. Since the implementation of the Specific Plan Program would also result in less than significant impacts related to physical deterioration of existing parks and recreational facilities, the Specific Plan Program's contribution to cumulative impacts would be less than cumulatively considerable.

Proposed Project Evaluation

Proposed Project-Specific

As discussed in Section 3.14, the Proposed Project is projected to include a residential population increase of approximately 1,644 residents based on the number of residential units that are proposed. Because the Proposed Project would result in fewer residential units on the Project site compared to the residential units evaluated for the Specific Plan Program in the Final PEIR (as discussed in Chapter 2), the Proposed Project would result in less impacts on recreational facilities compared to the Specific Plan Program. In addition, the Proposed Project includes the construction of an athletic field that would primarily be used as a soccer field but could serve as a multi-purpose and functional space for other recreational and sports uses. The Proposed Project also includes an athletic building that would include a swimming pool, basketball court, exercise rooms, walk/run track, and associated support facilities. These recreational facilities would reduce the Project's impact on the potential deterioration of existing parks and recreational facilities to less than significant.

Cumulative

Cumulative development within the Willowbrook Community would increase the use of neighborhood and regional parks and other recreational facilities; however, because the community currently has and forecasted to have park acreage that would exceed the County's goal of 4.0 acres per 1,000 residents, cumulative development would not increase the use of existing neighborhood and regional parks and other recreational facilities such that a substantial physical deterioration of the facility would occur or be accelerated. As a result, impacts associated with cumulative development would be less than significant. Because the Proposed Project would also result in less than significant impacts related to the physical deterioration of existing facilities, the Project's contribution to potential cumulative impacts would be less than cumulatively considerable.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the implementation of the Proposed Project would have a less than significant impact on the use of existing neighborhood and regional parks or other recreational facilities such that a substantial physical deterioration of the facility would not occur or be accelerated. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known

with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Recreational Facilities Physical Effect on the Environment

Impact 3.16-2: The Specific Plan Program and Proposed Project would not result in impacts or contribute to cumulative impacts associated with the inclusion of recreational facilities and would not require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

As identified in the Final PEIR, the Specific Plan Program does not specifically include the development of recreational facilities. As discussed above, the Willowbrook Community currently meets and exceeds the County goal for parks (i.e. greater than the 4.0 acres of parkland per 1,000 residents). With the Specific Plan Program's projected increase of 1,952 residential units and a corresponding population of approximately 5,739 residents, the amount of parkland within the Willowbrook Community would still be adequate to serve the new residents. The implementation of the Specific Plan Program would result in a parkland to population ratio of 5.63 acres of County parkland per 1,000 residents, which is above the County's goal to provide four acres of parkland per 1,000 residents. Therefore, the implementation of the Specific Plan Program would not require the construction or expansion of recreational facilities that could result in an adverse physical effect on the environment, and impacts would not occur.

Cumulative

The geographic context of cumulative impacts on recreational facilities is the Willowbrook community. Cumulative projects within the Willowbrook community may include recreation facilities, the construction of which would be evaluated by the County prior to permit or development approval. The potential development of recreational facilities associated with cumulative projects could result in significant impacts. Because no parkland or recreational facilities are proposed as part of Specific Plan Program, there would be no potential for the project to contribute to a cumulatively significant adverse physical effect on the environment.

Proposed Project Evaluation

Proposed Project-Specific

As discussed in Section 3.14, the Proposed Project would result in a residential population increase of approximately 1,644 residents based on the number of residential units that are proposed. Because the Proposed Project would result in fewer residential units compared to the Specific Plan Program's allocation of residential units to the Project site (as discussed in Chapter 2), the Proposed Project would result in less impacts on recreational facilities compared to the Specific Plan Program. In addition, because the Willowbrook Community currently meets and exceeds the County goal for parks (i.e. greater than the 4.0 acres of parkland per 1,000 residents) even with the implementation of the Proposed Project. The Proposed Project would not require the construction or expansion of recreational facilities that could result in an adverse physical effect on the environment. However, the Proposed Project includes the construction of an athletic field that

would primarily be used as a soccer field but could serve as a multi-purpose and functional space for other recreational and sports uses. The Proposed Project also includes an athletic building that would include a swimming pool, basketball court, exercise rooms, walk/run track, and associated support facilities. The provision of these recreational facilities, alone, would not result in an adverse physical effect on the environment, and therefore, impacts would not occur.

Cumulative

The geographic context of cumulative impacts on recreational facilities is the Willowbrook community. Cumulative projects within the Willowbrook community may include recreation facilities, the construction of which would be evaluated by the County prior to permit or development approval. The potential development of recreational facilities associated with cumulative projects could result in significant impacts. As discussed above, the Proposed Project would not require the construction or expansion of recreational facilities that could result in an adverse physical effect on the environment. Therefore, the Proposed Project would not contribute to potential cumulative impacts on the environment from the construction of recreational facilities.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the implementation of the Proposed Project would not result in adverse impacts on the environment from the provision of recreational facilities. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

3.16.6 References

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3.17 Transportation and Traffic

3.17.1 Introduction

This section addresses transportation and traffic-related conflicts with a program, plan, ordinance, or policy, increase hazards due to geometric design features, and inadequate emergency access, and the potential of the Proposed Project to result in environmental impacts. The Final PEIR did not include an evaluation of vehicle miles traveled because this issue was first included as a transportation issue in the CEQA Guidelines Appendix G thresholds subsequent to the certification of the Final PEIR. However, a vehicle miles traveled evaluation has been conducted for the Proposed Project. This section includes a brief summary of the environmental setting included in the Final PEIR, and the identification of any applicable changes to the transportation and traffic setting that may have occurred since the certification of the Final PEIR. In addition, a brief summary of the regulatory setting included in the Final PEIR and any substantive revisions to the regulatory setting that has occurred since the certification of the Final PEIR. This section also includes the thresholds of significance and a brief summary of the transportation and traffic impacts, and mitigation measures addressed in the Final PEIR, as well as the potential for transportation and traffic impacts associated with the Proposed Project. Finally, this section provides a conclusion of whether (1) the Proposed Project includes substantial changes that would require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact related to transportation and traffic; (2) substantial changes in the circumstances under which the Proposed Project is undertaken would require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact related to transportation and traffic; or (3) new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3) exist related to transportation and traffic.

The transportation analysis for the Proposed Project that includes the vehicle miles traveled (VMT) analysis is provided in the Transportation Assessment Study for the Charles R. Drew University Wellness and Education Center (Transportation Assessment Study) prepared by Raju Associates, Inc. in August 2024. The Transportation Assessment Study is located in Appendix I.

3.17.2 Environmental Setting

The Project site is located at 1667 East 118th Street in the community of Willowbrrok. It is generally located north of E. 118th Street, east of Compton Avenue, south of I-105, and west of the existing CDU surface and parking structure. The study area for the Transportation Assessment Study generally includes a distance of approximately one-quarter mile (1,320 feet) radius from the Project site. The study area includes key facilities generally bounded by E. 114th Street on the north, E. 120th Street on the south, Success Avenue on the west, and Wilmington Avenue on the east.

Street System

The existing street system within the study area consists of a regional roadway system including major and minor arterials and a local street system including collectors and local streets. A description of the regional and local access and circulation offered by the various roadways follows.

Primary regional access to the Project site is provided by the Glenn M. Anderson (I-105) Freeway, the Harbor (I-110) Freeway and Long Beach (I-710) Freeway. The I-105 Freeway, which runs in the east-west direction, adjacent to and north of the Project site, connects with the I-110 and I-710 Freeways, which run north-south. The I-110 Freeway is located approximately two miles west of the Project site, and the I-710 Freeway is located approximately four miles east of the Project site. The major and minor arterial streets that provide access to the study area include Compton Avenue, Imperial Highway, Wilmington Avenue, E. 119th Street, E. 120th Street and Willowbrook Avenue. The local streets providing access and circulation possibilities to the Project site include E. 117th Street, E. 117th Place, E. 118th Street and Holmes Avenue.

Descriptions of the roadway facilities serving the study area including number of lanes, speed limits, parking availability, and functional classes are discussed below.

- Compton Avenue – Compton Avenue is classified as a secondary arterial roadway in the County of Los Angeles, and it is classified as a collector street in the City of Los Angeles, north of Imperial Highway. It runs in a north-south direction and defines the western boundary of the Project site. The posted speed limit is 35 miles per hour in the vicinity of the study area. Within the study area, the roadway generally offers four travel lanes, two lanes in each direction with a double yellow median. On-street parking is generally allowed along this roadway.
- Imperial Highway – Imperial Highway is classified as a Modified Boulevard II (major arterial) in the City of Los Angeles and runs in an east-west direction north of the Project site. The posted speed limit is 40 miles per hour. The roadway generally offers five to six travel lanes, two to three lanes in the westbound direction and two to three lanes in the eastbound direction, with a central left-turn median. A bike lane is provided in the westbound direction beginning at Grandee Avenue. On-street parking is allowed along many stretches of this roadway within the study area. This roadway provides on- and off-ramps to the westbound I-105 Freeway located approximately one-half mile east of the Project site.
- Wilmington Avenue – Wilmington Avenue is classified as a major arterial roadway in the County of Los Angeles, and it is classified as a collector street in the City of Los Angeles, north of Imperial Highway. This roadway runs in a north-south direction and generally offers five to six travel lanes with no on-street parking between Imperial Highway Ramps and E. 120th Street, three lanes in the northbound direction and two to three lanes in the southbound direction. Two travel lanes are provided north of Imperial Highway, while four travel lanes are provided south of E. 120th Street.

  Within the study area, the posted speed limit is 35 miles per hour. This roadway provides on- and off-ramps to the eastbound I-105 Freeway located approximately 1,000 feet east of the Project site.
- E. 119th Street – E. 119th Street begins east of Wilmington Avenue and is a continuation of E. 120th Street. E. 119th Street is a secondary arterial roadway that traverses in an east-

west direction. This roadway offers two travel lanes, one lane per direction with a center left-turn median and bicycle sharrow in each direction. On-street parking is allowed along this roadway. The posted speed limit along this facility is 25 miles per hour.

- E. 120th Street – 120th Street is a secondary arterial roadway that traverses in an east-west direction. This roadway provides two travel lanes with a central left-turn median, one lane in each direction with on-street parking and bicycle lane. Four travel lanes, two lanes in each direction with stretches of on-street parking is provided along this roadway, west of Compton Avenue. The posted speed limit is 35 miles per hour. At Wilmington Avenue, this roadway becomes 119th Street.
- Willowbrook Avenue (West) – Willowbrook Avenue (West) is classified as a local street between Wilmington Avenue and E. 119th Street and is classified as a secondary arterial south of 119th Street. This section of the roadway operates one-way in the southbound direction and provides one to two travel lanes with a protected two-way bicycle path on the east side of the roadway. The posted speed limit is 15 miles per hour. South of E. 119th Street, Willowbrook Avenue (West) is classified as a secondary arterial roadway and generally offers two travel lanes, one lane in each direction, with a single dashed yellow median. On-street parking is allowed along the west side of this roadway. The posted speed limit is 35 miles per hour.
- Willowbrook Avenue (East) – Willowbrook Avenue (East) is classified as a secondary arterial roadway that traverses in a north-west to south-east direction. The posted speed limit is 35 miles per hour. The roadway generally offers two travel lanes, one lane in each direction, with a single dashed yellow median. On-street parking is allowed along the east side of this roadway within the study area.
- Success Avenue – Success Avenue is a local street that runs in a north-south direction. The speed limit is 25 miles per hour. The roadway generally offers two travel lanes, one lane per direction with a single dashed median and bike sharrow in each direction. On-street parking is allowed along this roadway within the study area.
- Antwerp Avenue – Antwerp Avenue is a local street that runs in a north-south direction. The prima facie speed limit is 25 miles per hour. The roadway generally offers two travel lanes, one lane in each direction. On-street parking is allowed along this roadway.
- Alabama Avenue – Alabama Avenue is a local street that runs in a north-south direction. The speed limit is 25 miles per hour. The roadway generally offers two travel lanes, one lane in each direction. On-street parking is allowed along this roadway within the study area.
- E. 117th Street – E. 117th Street is a local street that runs in an east-west direction. Within the study area, the Project site is located on both the north and south sides of E. 117th Street. The roadway generally offers two travel lanes, one lane in each direction. On-street parking is allowed along this roadway within the study area. The speed limit is 25 miles per hour.
- E. 117th Place – E. 117th Place is a local street that runs in an east-west direction from Alabama Street to a dead end, east of Compton Avenue. This roadway defines a portion of the Project's northern frontage. The prima facie speed limit is 25 miles per hour. The roadway generally offers two travel lanes, one lane in each direction. On-street parking is allowed along this roadway.
- E. 118th Street – R. 118th Street is a local street that runs in an east-west direction and defines the southern frontage of the Project site. Within the study area, the roadway

generally offers two travel lanes, one lane in each direction. On-street parking is allowed along this roadway within the study area. Speed humps are provided between Compton Avenue and Holmes Avenue. The posted speed limit is 25 miles per hour.

- Holmes Avenue – Holmes Avenue is a local street that runs in a north-south direction. The speed limit is 25 miles per hour. The roadway generally offers two travel lanes, one lane in each direction. On-street parking is allowed along this roadway within the study area.

Bike Facilities

The County of Los Angeles' *Bicycle Master Plan, March 2012* and the City of Los Angeles' *2010 Bicycle Plan* (which has been incorporated into the City's Mobility Plan 2035) document the existing and proposed bicycle facilities within the study area.

These facilities are classified as Bike Paths (Class I), Bike Lanes/Buffered Bike Lanes (Class II), Bike Routes/Bike Boulevards (Class III), and Protected Bike Lanes (Class IV). A brief description of these facilities follows:

- Class I – Bike Paths are exclusive car-free facilities that provide a paved right-of-way for bicyclists, pedestrians, and other non-motorized travel modes with cross flow of motorists minimized.
- Class II – Bike Lanes are on-street lanes that are dedicated only for bicycles and identified by a striped one-way bike lane separated from vehicular lanes. Buffered Bike Lanes are conventional bike lanes with a designated buffer space separating the bike lane from the adjacent motor vehicle lane and parking lane. Colored pavement may be added for bike lanes and buffered bike lanes to increase visibility of the facility, identify conflict areas, and reinforce priority to bicyclists in conflict areas.
- Class III – Bike Routes are in-road bikeways (typically the right-most lane in the direction of travel) where bicycles and motor vehicles share the roadway. Bike Boulevards are bike routes with low motorized traffic volumes. They are designated and designed to give bicycle travel priority. Posted signage for bicycle use and shared lane markings (sharrows or greenback sharrows) are typically included for bike routes and bike boulevards.
- Class IV – Protected Bike Lanes are bike lanes with physical barriers provided between the bike lane and other travel lanes. Protected bike lane treatments may be one-way or two-way facilities. Colored pavement may be added.
- Bike Boulevards - Bicycle boulevards are local roads or residential streets that have been enhanced with signage, traffic calming, and other treatments to prioritize bicycle travel. Bicycle boulevards are typically found on low-traffic / low-volume streets that can accommodate bicyclists and motorists in the same travel lanes, without specific bicycle lane delineation.

A detailed description of the existing bicycle facilities within the study area and an evaluation of the future bicycle network planned is presented in the following sections.

Existing Bicycle Facilities

Existing bicycle facilities are provided on the following streets in the vicinity of the Project site.

Class II Bike Lanes

- Bike Lanes:
  - Imperial Highway, westbound direction from Grandee Avenue to Central Avenue
  - E. 120th Street, eastbound and westbound directions from Compton Avenue to Wilmington Avenue

Class III Bike Routes

- Bike Routes with Sharrows:
  - Success Avenue, northbound and southbound directions, from Imperial Highway to E. 120th Street. Bike route continues on to Slater Avenue and ends at El Segundo Boulevard.
  - E. 119th Street, eastbound and westbound directions from Wilmington Avenue to Mona Boulevard.
  - Wilmington Avenue, northbound and southbound directions, from E. 104th Street to Imperial Highway.

Class IV Protected Bike Lanes

- Protected Bike Lanes:
  - Willowbrook Avenue (west), northbound and southbound direction from Willowbrook/Rosa Parks Metro Station to E. 120th Street.

Additionally, a Metro Bike Share Station is located near the Metro Rosa Park/Willowbrook Station located within the Hahn Shopping Center. Metro Bike Share provides 24-hour access to a fleet of bicycles for short trips.

Future Planned Bicycle Facilities

Future planned bicycle facilities are provided on the following streets:

Planned Class II Bike Lanes

- Bike Lanes:
  - Class II Bike Lanes are planned along Wilmington Avenue, northbound and southbound directions, from E. 120th Street to El Segundo Boulevard.
  - City of Los Angeles Tier 3 Bike Lanes are planned along Imperial Highway, eastbound and westbound directions, from Central Avenue to Mona Boulevard.
    - The City of Los Angeles' Bicycle Lane Network is a proposed network of bicycle lanes on arterial roadways with striped separation. The Bicycle Lane Network is comprised of Tier 2 and Tier 3 Bicycle Lanes. Tier 2 Bicycle Lanes are planned priority bicycle lanes on arterial roadways with striped separation.

Tier 3 Bicycle Lanes are planned bicycle lanes on arterial roadways with striped separation but are less priority than Tier 2.

Existing Transit Conditions

Nine bus lines and two light rail lines currently serve the study area. Five bus lines as well as the Metro A Line and C Line are operated by the Los Angeles County Metropolitan Transportation Authority (MTA or METRO), one bus line is operated by Los Angeles Department of Transportation (LADOT Dash), two lines are operated by Los Angeles County Public Works (LINK) and one line is operated by Gardena Transit (GT). These transit lines are described in the following section.

- MTA 53 - Line 53 is a local north/south line that provides service from Carson to Downtown Los Angeles and travels primarily along Central Avenue, E. 119th Street, E. 120th Street, Wilmington Avenue, Willowbrook Avenue (west), Imperial Highway and I-105 Freeway within the study area. This line runs every day, including holidays, at a peak frequency of approximately 10 minutes. The northern terminus is at the intersection of Beaudry Avenue and 5th Street in Downtown Los Angeles. The southern terminus is CSU Dominguez Hills in Carson.
- MTA 55 - Line 55 is a local north/south line that provides service from Downtown Los Angeles to Willowbrook and travels primarily along Compton Avenue, E. 119th Street, E. 120th Street, Wilmington Avenue and Willowbrook Avenue (west) within the study area. This line runs every day, including holidays, at a peak frequency of approximately 10-12 minutes during peak commute hours. The northern terminus is at the intersection of Sunset Boulevard and Figueroa Street in Downtown Los Angeles. The southern terminus is at the Willowbrook/Rosa Parks Metro Station in the Willowbrook community of Los Angeles County.
- MTA 120 – Line 120 is a local east/west line that provides service from Whittier to El Segundo and travels primarily along Imperial Highway, Compton Avenue, E. 119th Street, E. 120th Street, Wilmington Avenue and Willowbrook Avenue within the study area. This line runs every day, including holidays, at a frequency of approximately 40 minutes during peak commute hours. The eastern terminus is at the Whittwood Town Center in Whittier. The western terminus is at the Aviation/LAX Metro Station in El Segundo.
- MTA 202 - Line 202 is a local north/south line that provides service from Willowbrook to Rancho Dominguez and travels primarily along Wilmington Avenue, Willowbrook Avenue (west) and 119th Street within the study area. This line runs Monday through Friday, including some holidays, at a peak frequency of approximately 60 minutes. The northern terminus is at the Willowbrook/Rosa Parks Metro Station in Willowbrook. The southern terminus is at the Del Amo Station in Rancho Dominguez.
- MTA 205 - Line 205 is a local north/south line that provides service from Willowbrook to San Pedro and travels primarily along Wilmington Avenue, Willowbrook Avenue (west) and E. 119th Street within the study area. This line runs every day, including holidays, at a peak frequency of approximately 30 minutes. The northern terminus is at the Willowbrook/Rosa Parks Metro Station in Willowbrook. The southern terminus is at the intersection of Harbor Boulevard and 6th Street in San Pedro.
- Metro A Line – The Metro A Line is a north/south light-rail line that provides service from Long Beach to Los Angeles to Azusa and travels primarily adjacent to Willowbrook

Avenue within the study area. This line runs every day, including holidays, at a peak frequency of approximately 10 minutes during peak commute hours. The northern terminus is at Citrus College in Azusa. The southern terminus is at the intersection of Pacific Avenue and 1st Street in Long Beach.

- Metro C Line – The Metro C Line is an east/west light-rail line that provides service from Norwalk to Redondo Beach and travels primarily along the median of Glenn Anderson Freeway (I-105) within the study area. There is one station serving the study area – Imperial/Wilmington Rosa Parks Metro Station. This line runs every day, including holidays, at a peak frequency of approximately 10 minutes during peak commute hours. The eastern terminus is at Norwalk Metro Station. The western terminus is at Redondo Beach Metro Station.
- LADOT Dash Watts – This is a LADOT Dash line that provides service to the Watts area of the City of Los Angeles. This line is a local circulator route that travels primarily along E. 119th Street and E. 120th Street within the study area. It operates in both the clockwise and counterclockwise directions. This line runs every day, except on holidays, at a frequency of approximately 20 minutes. The terminus is at the Kenneth Hahn Plaza in Willowbrook.
- GT LINE 5 - Line 5 is a local east/west line that provides service from Willowbrook to El Segundo and travels primarily along Compton Avenue, E. 119th Street, E. 120th Street, Wilmington Avenue and Willowbrook Avenue (west) within the study area. This line runs Monday through Friday, at a peak frequency of approximately 60 minutes. The eastern terminus is at the Willowbrook/Rosa Parks Metro Station in Willowbrook. The western terminus is at the Aviation/LAX Metro Station in El Segundo.
- LINK Willowbrook Route A – Route A is a local east/west shuttle route that provides service from Willowbrook to West Rancho Dominguez-Victoria communities of Los Angeles County and travels primarily along Compton Avenue, E. 120th Street, E. 123rd Street, Elva Avenue, Slater Avenue and Wilmington Avenue within the study area. This line runs Monday through Saturday, except holidays, at a frequency of approximately 60 minutes. The eastern terminus is at the Kenneth Hahn Shopping Center in Willowbrook. The western terminus is at the intersection of San Pedro Street and 135th Street in West Rancho Dominguez-Victoria.
- LINK Willowbrook Route B – Route B is a local circulator shuttle route (operating in a clockwise direction) that provides service around the Willowbrook area and travels primarily along Compton Avenue, E. 119th Street, E. 120th Street, Wilmington Avenue, Willowbrook Avenue (west), Imperial Highway and E. 124th Street within the study area. This line runs Monday through Saturday, except holidays, at a frequency of approximately 30 minutes.

3.17.3 Regulatory Setting

Federal

There are no federal laws or regulations related to transportation which would apply to the Project.

State

State CEQA Guidelines Section 15064.3, Subdivision (b).

In January 2018, the OPR submitted a proposal for comprehensive updates to the State CEQA Guidelines to the California Natural Resources Agency. The submittal included proposed updates related to the analysis of greenhouse gas (GHG) emissions, energy, transportation impacts pursuant to SB 743, and wildfires, as well as revisions to Section 15126.2(a) in response to the California Supreme Court's decision in California Building Industry Association v. Bay Area Air Quality Management District (2015) 62 Cal. 4th 369. On December 28, 2018, the updated State CEQA Guidelines went into effect.

As part of the update to the State CEQA Guidelines, Section 15064.3 was added and codifies that project-related transportation impacts are typically best measured by evaluating the project's VMT. Specifically, subdivision (b) focuses on specific criteria related to transportation analysis and is divided into four subdivisions: (1) land use projects, (2) transportation projects, (3) qualitative analysis, and (4) methodology. Subdivision (b)(1) provides guidance on determining the significance of transportation impacts of land use projects using VMT; projects located within 0.5 mile of high-quality transit should be considered to have a less than significant impact. Subdivision (b)(2) addresses VMT associated with transportation projects and states that projects that reduce VMT, such as pedestrian, bicycle, and transit projects, should be presumed to have a less than significant impact. Subdivision (b)(3) acknowledges that Lead Agencies may not be able to quantitatively estimate VMT for every project type; in these cases, a qualitative analysis may be used. Subdivision (b)(4) stipulates that Lead Agencies have the discretion to formulate a methodology that would appropriately analyze a project's VMT. Although an agency may elect to be governed by the provisions of this section immediately, it was not required until July 1, 2020.

Regional

Connect SoCal: 2020-2045 SCAG RTP/SCS (2020)

The Connect SoCal 2020-2045 SCAG RTP/SCS is a long-range visioning plan that builds upon and expands land use and transportation strategies to increase mobility options and achieve a more sustainable growth pattern in the SCAG area. The Plan's core visions include sustainable development, system preservation & resilience, demand & system management, transit backbone, complete streets, and goods movement. The RTP/SCS aims to reduce greenhouse gas emissions from transportation.

Los Angeles County General Plan Mobility Element

Adopted in October 2015, the County of Los Angeles General Plan contains policies in the Mobility Element that address transportation issues relevant to the Specific Plan Program. The County's intent is to promote and develop efficient and convenient travel by all appropriate modes (e.g., pedestrian, bicycle, regional and local bus transit and rail). The General Plan includes a Transit Oriented District Program (Program LU-2 in Chapter 16 General Plan Implementation Programs). The mobility objective of the Transit Oriented District Program is to increase walking, bicycling, and transit ridership and reduce vehicle miles traveled (VMTs).

Los Angeles County Bicycle Master Plan

The Los Angeles County Bicycle Master Plan, adopted in March 2012, provides policy guidance for building a comprehensive bicycle network throughout the unincorporated areas. The Bicycle Master Plan identifies bikeways and transportation systems that are available for use by bicyclists, such as roadways with bike lanes or designated bike routes, and dedicated off-road bike paths, such as bike paths along the flood protection channels. The purpose of the Bicycle Master Plan is to 1) guide the development of infrastructure, policies and programs that improve the bicycling environment; 2) depict the general location of planned bikeway routes; and 3) provide for a system of bikeways that is consistent with the General Plan. The Bicycle Master Plan maps depict bikeways along roadways in the unincorporated areas and along rivers, creeks, and flood protection facilities countywide. These bikeways may be used for both recreational use and commuter travel.

Step By Step Los Angeles County Pedestrian Plans for Unincorporated Communities, September 2019.

In 2019, Los Angeles County adopted Step By Step Los Angeles County Pedestrian Plans for Unincorporated Communities, September 2019, Los Angeles County Department of Public Health. The Plan serves as a critical step in implementing the County's Vision Zero goal of eliminating fatal and severe injury traffic collisions. The Step By Step document outlines actions, policies, procedures, and programs that the County of Los Angeles will consider to enhance walkability across unincorporated communities. It also includes Community Pedestrian Plans that identify potential pedestrian infrastructure projects for specific unincorporated communities. The pedestrian plan for the Willowbrook/West Rancho Dominguez community (Chapter 14 – Willowbrook/ West Rancho Dominguez Draft Community Pedestrian Plan) is currently in draft form as of this writing.

Vision Zero Program Los Angeles County, November 2019

County of Los Angeles' Vision Zero Program implements projects that are designed to increase safety on the most vulnerable City streets. This Vision Zero Action Plan focuses the County's efforts over the next five years to achieve the goal of eliminating traffic-related fatalities on unincorporated County roadways by 2035.

Metro Long Range Transportation Plan (2020)

The Metro Long Range Transportation Plan provides a thirty-year vision for addressing growth and traffic in Los Angeles County. The Plan has priority goals including better transit, less congestion, complete streets, and access to opportunity.

Metro Short Range Transportation Plan (2014)

The Metro Short Range Transportation Plan provides a ten-year plan to ensure the transportation system moves people and goods safely.

Los Angeles County Transportation Impact Assessment Guidelines

VMT Screening Criteria

The following screening criteria serve as guidance for projects to determine whether a Transportation Impact Analysis should be performed, and the criteria to determine if a project generates a significant transportation impact. The County has adopted four VMT screening criteria including Non-Retail Project Trip Generation Screening, Retail Project site Plan Screening, Proximity to Transit Based Screening and Residential Land Use Based Screening. Based on the Project's location, the Proximity to Transit Based Screening Criteria has been utilized.

CEQA Guideline Section 15064.3, subdivision (b)(1), states lead agencies generally should presume that certain projects (including residential, retail, and office projects, as well as projects that are a mix of these uses) proposed within ½ mile of an existing major transit stop or an existing stop along a high-quality transit corridor will have a less-than-significant impact on VMT. A major transit stop is defined as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods (CA Public Resource Code Section 21064.3).

3.17.4 Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines and the County of Los Angeles Environmental Checklist Form, the project could have a significant on Transportation and Traffic if it would:

- Conflict with an applicable plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? (see Impact 3.17-1).
- Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)? (see Impact 3.17-2).
- Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment) (see Impact 3.17-3).?
- Result in inadequate emergency access? (see Impact 3.17-4).

3.17.5 Impact Analysis

As discussed above, the metric to evaluate transportation impacts has changed from level of service, or similar measures of the level of vehicular capacity or congestion, to vehicle miles traveled. Because Mitigation Measures TRA-1 through TRA-37 were included in the Final PEIR for the Specific Plan Program to reduce congestion and potential impacts to level of service, these measures have been removed for the Proposed Project as shown below.

> **Mitigation Measure TRAF-1 (Removed):** ~~Avalon Blvd & El Segundo Blvd (#3) - Prior to the issuance of a building permit, the County of Los Angeles shall ensure the restriping of the northbound approach to add a right turn lane prior to an individual project exceeding the County's significance criteria. The timing of this improvement shall be determined through the preparation of a traffic evaluation by the individual project~~

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

Mitigation Measure TRAF-2 (Removed): ~~Central Ave & El Segundo Blvd (#10) - Prior to the issuance of a building permit, the County of Los Angeles shall ensure the restriping of the southbound approach to provide a separate right turn lane and restriping the northbound approach by reducing the median to 2 feet before an individual project exceeds the County's significance criteria. The timing of this improvement shall be determined through the preparation of a traffic evaluation by the individual project applicant and reviewed by the County. This improvement would modify both approaches from one left turn lane, one through lane, and one through-right turn lane to one left turn lane, two through lanes and a separate right turn lane. Buses would be allowed to go through the intersection from the right-turn lane. This was a mitigation measure in the Martin Luther King Jr. Medical Campus EIR. In addition, the County of Los Angeles shall ensure the restriping of the westbound approach to provide a separate right turn lane by narrowing the median to 2 feet prior to an individual project exceeding the County's significance criteria. The timing of this improvement shall be determined through the preparation of a traffic evaluation by the individual project applicant and reviewed by the County. This improvement would modify the approach from one left turn lane, one through lane, and one through-right turn lane to one left turn lane, two through lanes and a separate right turn lane.~~

Mitigation Measure TRAF-3 (Removed): ~~Central Ave & Rosecrans Ave (#11)) - Prior to the issuance of a building permit, the County of Los Angeles shall ensure the restriping of the westbound approach to provide a separate right-turn lane by narrowing the median to 2 feet before an individual project exceeds the County's significance criteria. The timing of this improvement shall be determined through the preparation of a traffic evaluation by the individual project applicant and reviewed by the County. This improvement would modify the approach from one left turn lane, one through lane, and one through-right turn lane to one left turn lane, two through lanes and a separate right turn lane. Buses would be allowed to go through the intersection from the right-turn lane. This was a mitigation measure in the Martin Luther King Jr. Medical Campus EIR.~~

Mitigation Measure TRAF-4 (Removed): ~~Compton Ave & Imperial Hwy (#17) - Prior to the issuance of a building permit, the County of Los Angeles shall ensure the restriping of the westbound approach to provide a separate right-turn lane before an individual project exceeds the County's significance criteria. The timing of this improvement shall be determined through the preparation of a traffic evaluation by the individual project~~

~~applicant and reviewed by the County. This improvement would modify the approach from one left-turn lane, one through lane, and one through-right turn lane to one left-turn lane, two through lanes and a separate right turn lane. This was a mitigation measure in the Martin Luther King Jr. Medical Campus EIR.~~

Mitigation Measure TRAF-5 (Removed): ~~Wilmington Ave & I-105 e/b Ramps (#27) - Prior to the issuance of a building permit, the County of Los Angeles shall ensure that an additional eastbound lane will be installed by widening (reducing the raised median on the ramp) the off-ramp before an individual project exceeds the County's significance criteria. The timing of this improvement shall be determined through the preparation of a traffic evaluation by the individual project applicant and reviewed by the County. This improvement would modify the approach from a left-turn lane and a right-turn lane to a left-turn lane, shared left-right turn lane and a separate right-turn lane. In addition, the County of Los Angeles shall ensure that an additional northbound left-turn lane is provided by reducing the median width. This improvement would modify the approach from a left-turn lane and three through lanes to dual left-turn lanes and three through lanes. These were mitigation measures in the Martin Luther King Jr. Medical Campus EIR.~~

Mitigation Measure TRAF-6 (Removed): ~~Wilmington Ave & 118th St (#28) - Prior to the issuance of a building permit, the County of Los Angeles shall ensure the restriping of the eastbound approach of 118th Street to provide a separate right-turn lane before an individual project exceeds the County's significance criteria. The timing of this improvement shall be determined through the preparation of a traffic evaluation by the individual project applicant and reviewed by the County. This improvement would modify the eastbound approach from a shared left-through-right lane to a shared left-through lane and a right turn lane. This was a mitigation measure in the Martin Luther King Jr. Medical Campus EIR.~~

Mitigation Measure TRAF-7 (Removed): ~~Wilmington Ave & 120th St (East) (#30) - Prior to the issuance of a building permit, the County of Los Angeles shall ensure that 120th Street west of Wilmington Avenue (the driveway to the MLK Medical Campus) is widened for 250 feet, on the south side by 2 feet and the eastbound approach is restriped to provide dual left-turn lanes before an individual project exceeds the County's significance criteria. The timing of this improvement shall be determined through the preparation of a traffic evaluation by the individual project applicant and reviewed by the County. This improvement would modify the approach from a left-through lane and a right-turn lane to dual left-turn lanes, a through lane, and a right-turn lane. This was a mitigation measure in the Martin Luther King Jr. Medical Campus EIR.~~

Mitigation Measure TRAF-8 (Removed): ~~Wilmington Ave & El Segundo Blvd (#32) - Prior to the issuance of a building permit, the County of Los Angeles shall ensure the restriping of the eastbound and westbound approaches to add separate right-turn lanes before an individual project exceeds the County's significance criteria. The timing of this improvement shall be determined through the preparation of a traffic evaluation by the individual project applicant and reviewed by the County. This improvement would allow buses to go through the intersection from the right-turn lanes. This improvement would modify both approaches from a left-turn lane, a through lane, and a through-right lane to a left-turn lane, two through lanes, and a right-turn lane. This was a mitigation measure in the Martin Luther King Jr. Medical Campus EIR.~~

Mitigation Measure TRAF-9 (Removed): ~~Imperial Hwy & I-105 w/b Ramps (#36) - Prior to the issuance of a building permit, the County of Los Angeles shall ensure that a third northbound left-turn lane is provided by widening the off-ramp by 10 feet for approximately 150 feet to 200 feet before an individual project exceeds the County's significance criteria. The timing of this improvement shall be determined through the preparation of a traffic evaluation by the individual project applicant and reviewed by the County. This improvement would modify the approach from a left-turn lane, a left-through lane, and a right-turn lane to dual left-turn lanes, a left-through lane, and a right-turn lane. This was a mitigation measure in the Martin Luther King Jr. Medical Campus EIR.~~

Mitigation Measure TRAF-10 (Removed): ~~Alameda St & 103rd St (#43) - Prior to the issuance of a building permit, the County of Los Angeles shall ensure the restriping of the eastbound approach for a separate left-turn lane before an individual project exceeds the County's significance criteria. The timing of this improvement shall be determined through the preparation of a traffic evaluation by the individual project applicant and reviewed by the County. This improvement would modify the approach from a shared left/right lane to a left-turn lane and a shared left/right lane. This was a mitigation measure in the Martin Luther King Jr. Medical Campus EIR.~~

Mitigation Measure TRAF-11 (Removed): ~~Alameda St & Imperial Hwy (#45) - Prior to the issuance of a building permit, the County of Los Angeles shall ensure the restriping of the southbound approach for dual right-turn lanes before an individual project exceeds the County's significance criteria. The timing of this improvement shall be determined through the preparation of a traffic evaluation by the individual project applicant and reviewed by the County. This improvement would modify the approach from a left-turn lane, two through lanes, and a right-turn lane to dual left-turn lanes, two through lanes, and a separate right-right lane. This is a modification of the mitigation measure in the Martin Luther King Jr. Medical Campus EIR.~~

Mitigation Measure TRAF-12 (Removed): ~~Alameda St & El Segundo Blvd (#46) - Prior to the issuance of a building permit, the County of Los Angeles shall ensure the restriping of the northbound and southbound approaches to provide separate right-turn lanes before an individual project exceeds the County's significance criteria. The timing of this improvement shall be determined through the preparation of a traffic evaluation by the individual project applicant and reviewed by the County. This improvement would modify both approaches from a left-turn lane, a through lane, and a through-right lane to a left-turn lane, two through lanes, and a right-turn lane. This was a mitigation measure in the Martin Luther King Jr. Medical Campus EIR.~~

Mitigation Measure TRAF-13 (Removed): ~~Wilmington Ave & Greenleaf Blvd (#62) - Prior to issuance of a grading permit, each project applicant shall determine their project's proportionate share funding of acquiring additional right-of-way and implementing additional improvements through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Compton. The proportionate share funding of the additional right-of-way acquisition and improvement to improve the AM and PM peak hour levels of service shall be provided by the project applicant if the City of Compton has established a proportionate share funding mechanism for the improvement at this intersection.~~

Mitigation Measure TRAF-14 (Removed): ~~Compton Ave & El Segundo Blvd (#21) - Prior to the issuance of a grading permit for each individual project, the project applicant shall determine their project's proportionate share funding of restriping the eastbound and westbound approaches to provide separate right-turn lanes by narrowing the medians to 2 feet. This proportionate share funding shall be determined through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Compton. The proportionate share funding shall be provided by the project applicant if the City of Compton has established a proportionate share funding mechanism.~~

Mitigation Measure TRAF-15 (Removed): ~~Wilmington Ave & Rosecrans Ave (#33) - Prior to the issuance of a grading permit for each individual project, the project applicant shall determine their project's proportionate share funding of restriping the northbound approach to provide a separate right-turn lane by narrowing the median to 2 feet. This improvement would modify the approach from a left-turn lane, a through lane, and a through-right lane to a left-turn lane, two through lanes, and a right-turn lane. This proportionate share funding shall be determined through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Compton. The proportionate share funding shall be provided by the project applicant if the City of Compton has established a proportionate share funding mechanism for the improvement at this intersection.~~

Mitigation Measure TRAF-16 (Removed): ~~Wilmington Ave & W Compton Blvd (#58) - Prior to issuance of a grading permit, each project applicant shall determine their project's proportionate share funding of acquiring additional right-of-way and implementing additional improvements through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Compton. The proportionate share funding of the additional right-of-way acquisition and improvement to improve the PM peak hour level of service shall be provided by the project applicant if the City of Compton has established a proportionate share funding mechanism for the improvement at this intersection.~~

Mitigation Measure TRAF-17 (Removed): ~~Wilmington Ave & Alondra Blvd (#61) - Prior to the issuance of a grading permit for each individual project, the project applicant shall determine their project's proportionate share funding of restriping the westbound approach to provide a separate right-turn lane by narrowing the median to 3 feet. This improvement would modify the approach from a left-turn lane, a through lane, and a through-right lane to a left-turn lane, two through lanes, and a right-turn lane. This proportionate share funding shall be determined through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Compton. The proportionate share funding shall be provided by the project applicant if the City of Compton has established a proportionate share funding mechanism for the improvement at this intersection.~~

Mitigation Measure TRAF-18 (Removed): ~~Wilmington Ave & Walnut St (#63) - Prior to the issuance of a grading permit for each individual project, the project applicant shall determine their project's proportionate share funding of restriping and modifying the eastbound approach from a left-turn lane, a through lane, and a right-turn lane to left-turn lane, a through lane, and a through-right lane. It requires converting Walnut Street east of the intersection from one lane eastbound to two lanes eastbound for a minimum of 400 feet providing an 11-foot lane and a 12-foot curb lane prior to merging back to one lane and prohibiting on-street parking for the same distance. The proportionate share funding~~

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

Mitigation Measure TRAF-19 (Removed): ~~Imperial Hwy & State St (#54) - Prior to the issuance of a grading permit for each individual project, the project applicant shall determine their project's proportionate share funding of restriping the northbound and southbound approaches to provide separate right-turn lanes. This improvement would modify both approaches from a left-turn lane, a through lane, and a through-right lane to a left-turn lane, two through lanes, and a right-turn lane. These improvements require removal of two on-street parking spaces on each approach. The proportionate share funding shall be determined through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Lynwood. The proportionate share funding shall be provided by the project applicant if the City of Lynwood has established a proportionate share funding mechanism for the improvement at this intersection.~~

Mitigation Measure TRAF-20 (Removed): ~~Avalon Blvd & Imperial Hwy (#1) - Prior to issuance of a grading permit, each project applicant shall determine their project's proportionate share funding of acquiring additional right-of-way and implementing additional improvements through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Los Angeles. The proportionate share funding of the additional right-of-way acquisition and improvement to improve the AM and PM peak hour levels of service shall be provided by the project applicant if the City of Los Angeles has established a proportionate share funding mechanism for the improvement at this intersection.~~

Mitigation Measure TRAF-21 (Removed): ~~Avalon Blvd & 120th Street (#2) - Prior to issuance of a grading permit, each project applicant shall determine their project's proportionate share funding of acquiring additional right-of-way and implementing additional improvements through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Los Angeles. The proportionate share funding of the additional right-of-way acquisition and improvement to improve the PM peak hour level of service shall be provided by the project applicant if the City of Los Angeles has established a proportionate share funding mechanism for the improvement at this intersection.~~

Mitigation Measure TRAF-22 (Removed): ~~Central Ave & Imperial Hwy (#6) - Prior to issuance of a grading permit, each project applicant shall determine their project's proportionate share funding of acquiring additional right-of-way and implementing additional improvements through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Los Angeles. The proportionate share funding of the additional right-of-way acquisition and improvement to improve the AM and PM peak hour levels of service shall be provided by the project applicant if the City of Los Angeles has established a proportionate share funding mechanism for the improvement at this intersection.~~

Mitigation Measure TRAF-23 (Removed): ~~Central Ave & I-105 WB Ramps (#7) - Prior to the issuance of a grading permit for each individual project, the project applicant shall determine their project's proportionate share funding of restriping the westbound approach from a left-turn lane, a through-left lane, and right-turn lane to a left-turn lane, a~~

~~through-right lane, and a right-turn lane. This proportionate share funding shall be determined through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Los Angeles. The proportionate share funding shall be provided by the project applicant if the City of Los Angeles has established a proportionate share funding mechanism.~~

Mitigation Measure TRAF-24 (Removed): ~~Central Ave & 120th St (#9) – Prior to the issuance of a grading permit for each individual project, the project applicant shall determine their project's proportionate share funding of restriping the northbound approach to provide a separate right-turn lane. This improvement would modify the approach from a left-turn, a through lane, and a through-right lane to a left-turn lane, two through lanes, and a separate right-turn lane. This was a mitigation measure in the Martin Luther King Jr. Medical Campus EIR. The proportionate share funding of the restriping improvement to improve the AM and PM peak hour levels of service shall be provided by the project applicant if the City of Los Angeles has established a proportionate share funding mechanism for the improvement at this intersection.~~

Mitigation Measure TRAF-25 (Removed): ~~Wilmington Ave & 112th St (#25) – Prior to the issuance of a grading permit for each individual project, the project applicant shall determine their project's proportionate share funding of installation of a new traffic signal at this location because the signal warrant analysis indicated that a traffic signal would be warranted. The proportionate share funding shall be determined through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Los Angeles. The proportionate share funding shall be provided by the project applicant if the City of Los Angeles has established a proportionate share funding mechanism for the improvement at this intersection.~~

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

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

Mitigation Measure TRAF-28 (Removed): ~~Central Ave & Compton Blvd (#57) – Prior to the issuance of a grading permit for each individual project, the project applicant shall determine their project's proportionate share funding of restriping the northbound~~

~~approach to provide a separate right-turn lane by narrowing the median to 2 feet. This would modify the approach from a left-turn lane, a through lane, and a through-right lane to a left-turn lane, two through lanes, and a right-turn lane. This improvement requires removal of five on-street parking spots on the northbound approach. The proportionate share funding shall be determined through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Compton. The proportionate share funding shall be provided by the project applicant if the City of Compton has established a proportionate share funding mechanism for the improvement at this intersection.~~

Mitigation Measure TRAF-29 (Removed): ~~Central Ave & Alondra Blvd (#60) – Prior to the issuance of a grading permit for each individual project, the project applicant shall determine their project's proportionate share funding of restriping the northbound and southbound approaches to provide a separate right-turn lane by narrowing the median to 2 feet. This would modify both approaches from a left-turn lane, a through lane, and a through-right lane to a left-turn lane, two through lanes, and a right-turn lane. The proportionate share funding shall be determined through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and City of Compton. The proportionate share funding shall be provided by the project applicant if the City of Compton has established a proportionate share funding mechanism for the improvement at this intersection.~~

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

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

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

~~significant impacts to Caltrans mainline facilities, the applicant shall enter into a traffic mitigation agreement with Caltrans before or within 6 months of the project EIR.~~

Mitigation Measure TRAF-33 (Removed): ~~I10 SB off-ramp at El Segundo Blvd - Prior to issuance of a grading permit, each project applicant shall determine their project's proportionate share funding of acquiring additional right-of-way and implementing additional improvements at this off-ramp through the preparation of a traffic evaluation to be reviewed by the County of Los Angeles and Caltrans. The proportionate share funding of the additional right-of-way acquisition and improvement to improve the AM and PM peak hour levels of service shall be provided by the project applicant if Caltrans has established a proportionate share funding mechanism for the improvement at this intersection.~~

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

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

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

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

~~by the project applicant if Caltrans has established a proportionate share funding mechanism for the improvement at this intersection.~~

Conflict with Adopted Circulation Program, Plan, Ordinance, or Policy

Impact 3.17-1: The Specific Plan Program and Proposed Project would have less than significant and less than cumulatively considerable effects related to conflict with a program plan, ordinance or policy addressing the circulation system.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Initial Study/Notice of Preparation and Final PEIR identified that the Specific Plan Program itself is based on the encouragement of TOD and therefore, would support alternative transportation, and would be consistent with and further adopted policies, plans, and programs supporting alternative transportation (e.g., taking the Metro, bus turnouts, bicycle racks). A number of pedestrian-oriented intersection improvements would be implemented throughout the Specific Plan Program area. These would be based on a menu of improvements that includes adding high visibility crosswalks at intersections; adding passive pedestrian detection and pedestrian push buttons for crosswalks at traffic signals at intersections; adding countdown pedestrian signals and audio signals to crosswalks at intersections; adding advance stop bars to intersection approaches; adding sidewalk bulb-outs and extensions, or reducing curb returns, on intersection corners where feasible; adding median nose/crossing islands where advantageous and feasible. These measures would facilitate pedestrian circulation, by reducing the width of roadway for pedestrians to cross, providing additional sidewalk space, and making pedestrian crossings more visible to both pedestrians and motorists. Impacts would be less than significant.

Cumulative

The Final PEIR did not address cumulative impacts related to a conflict with adopted circulation program, plan, ordinance, or policy because the Specific Plan Program is a transit-oriented district that would be consistent with the County's circulation programs, plans, ordinances, and or policies. Therefore, the Specific Plan Program would not contribute to cumulative impacts related to the County's circulation programs, plans, ordinances, and policies.

Proposed Project Evaluation

Proposed Project-Specific

The Proposed Project has been evaluated in the Transportation Study for its consistency with programs, plans, ordinances, or policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

Los Angeles County Bicycle Master Plan

As discussed above, existing bicycle lanes are provided along E. 120th Street and Imperial Highway, as well as protected bike lanes provided along Willowbrook Avenue. Existing bike routes are designated along Success Avenue, E. 119th Street, and Wilmington Avenue. Bike lanes are planned along Wilmington Avenue south of E. 120th Street. Additionally, an extension of the bike lanes along Imperial Highway is also planned.

The Proposed Project supports the policies and goals of the Los Angeles County Bicycle Master Plan by providing a total of 366 bicycle parking spaces (294 long-term and 72 short-term spaces) located all around the Project site. Additionally, the Proposed Project proposes the vacation and conversion of a portion of E. 118th Street along the majority of the southern boundary of the Project site that would eliminate vehicular travel in favor of a pedestrian promenade that would primarily allow safe pedestrian mobility and bicycle travel. These Proposed Project components will encourage bicycle travel. The Proposed Project does not preclude any planned improvements included as part of the Los Angeles County Bicycle Master Plan or the Class III Bike Route along E. 118th Street between Compton Avenue and Holmes Avenue along the southern boundary of the Project site that is identified in the Willowbrook Transit-Oriented Specific Plan. The Class III Bike Route has no special lane for bicycles. Therefore, the Proposed Project is consistent with this Plan.

Step by Step Los Angeles County Pedestrian Plans for Unincorporated Communities

The Proposed Project encourages and promotes walking and bicycling by closing E. 118th Street to vehicular travel and creating a pedestrian promenade. The E. 118th Street pedestrian promenade would include landscaping and seating areas adjacent to the proposed buildings on the north and south sides as well as pedestrian walkways. The pedestrian promenade would provide a pedestrian and bicycle connection to the existing CDU Campus, allowing students and faculty to safely travel between the Campus and the Project site. The Proposed Project supports the goals and policies of the Step by Step Plan and does not preclude any planned improvements identified as part of the Plan. Therefore, the Proposed Project is consistent with this Plan.

Vision Zero Program

As mentioned above, a portion of the Project's frontage is located along Compton Avenue, a roadway identified in the County's High Injury Network (HIN). Pedestrian improvements along Compton Avenue have been identified as part of the County's Step By Step Plan which serves as a critical step in implementing the County's Vision Zero goal of eliminating fatal and severe injury traffic collisions. The Proposed Project would not preclude future Vision Zero and Step By Step Plan safety improvements identified by the County of Los Angeles. Additionally, the Proposed Project supports the goals and policies of the County's Vision Zero Program by creating a pedestrian promenade along E. 118th Street that would provide a pedestrian and bicycle connection to the existing CDU Campus, allowing students and faculty to safely travel between the Campus and the Project site. Therefore, the Proposed Project is consistent with the Vision Zero Program.

Connect SoCal: 2020-2045 SCAG RTP/SCS (2020)

Due to its proximity to the Metro Rosa Parks/Willowbrook Stations, the Proposed Project promotes transit uses, encourages ridership, and reduces automobile travel to the Project site. The Project is located within a Transit Priority Area (TPA) as defined by the Southern California Association of Government (SCAG), as part of SCAG's 2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). In the SCAG 2045 Transit Priority Areas (TPA) are identified to be within one-half mile from major transit stops and high-quality transit corridors.

Since the Proposed Project is located within a TPA, the Proposed Project is presumed to cause a less than significant VMT transportation impact and is, therefore, consistent with the RTP/SCS in terms of the greenhouse gas reduction goals. Therefore, the Proposed Project is consistent with the Connect SoCal: 2020-2045 SCAG RTP/SCS.

Metro Long Range Transportation Plan

The Proposed Project would be consistent with Strategies 3.1, 3.2, and 3.3 of the Metro Long Range Transportation Plan. The Proposed Project supports Strategy 3.1 by providing open space, and landscaped elements along the Project perimeter and within the Project site to create a walkable and safe pedestrian environment. Additionally, the Project is located within one-half mile of Metro's Rosa Parks/Willowbrook Station. Due to the proximity to the transit station, the Proposed Project supports transit uses, encourages ridership, and reduces automobile travel to the Project site, and thus is consistent with Strategy 3.2. Furthermore, the Proposed Project supports Strategy 3.3 by providing new sidewalks and parkways along its Project frontage, and secure onsite bicycle parking. Additionally, the Project encourages and promotes walking and bicycles by creating a pedestrian promenade along E. 118th Street. Therefore, the Proposed Project is consistent with the Metro Long Range Transportation Plan.

Metro Short Range Transportation Plan

The Proposed Project would not preclude the implementation of Metro's Short-Range Transportation Plan due to its proximity to the transit station, which promotes transit uses, encourages ridership, and reduces automobile travel to the Project site. Therefore, the Proposed Project is consistent with the Metro Short Range Transportation Plan.

Based on the above, the Proposed Project conforms with and does not obstruct or impede the County's development policies and standards generally considered to be consistent. The Proposed Project does not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities. Therefore, the Proposed Project would cause a less than significant impact relative to the consistency with plans, programs, ordinances, or policies.

Cumulative

The Proposed Project has been reviewed in combination with nearby related projects to determine if there may be a cumulatively significant impact resulting from inconsistency with a particular program, plan, policy, or ordinance. A cumulative impact could occur if the project as well as other future development projects located on the same block were to preclude the County's ability to serve transportation user needs as defined by the County's transportation policy framework. It was observed that there is one related project located along the same block as the Proposed Project. Similar to the Proposed Project, the related projects would be individually responsible for complying with relevant plans, programs, ordinances, or policies addressing the circulation system. Therefore, the Proposed Project, together with the related projects, would not result in cumulative impacts with respect to consistency with each of the plans, ordinances, or policies reviewed. The Proposed Project and the related projects would not interfere with any of the general policy recommendations and/or pilot proposals and, therefore, the Proposed Project would not contribute to potential cumulative impacts.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project would not result in impacts related to existing alternative transportation programs, plans, ordinances and policies. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Conflict with CEQA Guideline Section 15064.3, Subdivision (b)

Impact 3.17-2: The Specific Plan Program was not evaluated for its conflict or consistency with CEQA Guidelines Section 15064.3, subdivision (b).

The Proposed Project would result in a less than significant and less than cumulatively considerable impact related to its conflict or consistency with CEQA Guidelines Section 15064.3, subdivision (b).

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Final PEIR did not include an evaluation of the Specific Plan Program's consistency with CEQA Guidelines Section 15064.3(b) that includes a vehicle miles traveled evaluation because this issue was first included as a transportation issue in the CEQA Guidelines Appendix G thresholds subsequent to the certification of the Final PEIR.

Cumulative

The Final PEIR did not address cumulative impacts related to vehicle miles traveled because this issue was first included as a transportation issue in the CEQA Guidelines Appendix G thresholds subsequent to the certification of the Final PEIR.

Proposed Project Evaluation

Proposed Project-Specific

A VMT analysis was prepared for the Proposed Project using the County's guidelines discussed below.

Screening Criteria

The County has adopted four VMT screening criteria including Non-Retail Project Trip Generation Screening, Retail Project site Plan Screening, Proximity to Transit Based Screening and Residential Land Use Based Screening. Based on the Project's location, the Proximity to Transit Based Screening Criteria has been utilized.

CEQA Guideline Section 15064.3, subdivision (b)(1), states lead agencies generally should presume that certain projects (including residential, retail, and office projects, as well as projects that are a mix of these uses) proposed within ½ mile of an existing major transit stop or an existing stop along a high-quality transit corridor will have a less-than-significant impact on VMT. A major transit stop is defined as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods (CA Public Resource Code Section 21064.3).

Proximity to Transit Based Screening Criteria

The Transportation Study prepared for the Proposed Project identified that the Project site is located within a one-half mile radius from the major transit stop of the Metro Rosa Parks/Willowbrook Station which serves the Metro A and Metro C light-rail lines and directly served by several bus routes within the study area. Based on the Proximity to Transit Based Screening Criteria subsequent questions, the Proposed Project has a Floor Area Ratio of 1.591, would provide 854 parking spaces compared to the parking requirement of 869 parking spaces, is consistent with SCAG RTP/SCS as discussed above under Impact 3.17-1, and would not replace residential units set aside for lower income households as it would provide additional housing units in a vacant lot.

Based on the Project site's proximity to an existing transit stop along an existing high quality transit corridor, the Proposed Project would result in less than significant impacts. Therefore, the Proposed Project would not conflict with or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).

Cumulative

Based on the County guidelines and screening criteria, the Proposed Project would result in less than cumulative VMT impact if it is consistent with the local RTP/SCS. As discussed above, the Proposed Project is within a one-half mile of an existing major transit stop. As a result, the Proposed Project's contribution to cumulative VMT impacts would be less than cumulatively considerable.

Applicable Mitigation Measures for the Proposed Project

The Specific Plan Program was not evaluated for vehicle miles traveled, and therefore, no mitigation measures were identified for the Specific Plan Program. As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

Although the Specific Plan Program was not evaluated for its conflict or inconsistency with CEQA Guidelines Section 15064.3(b), the Proposed Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b). Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and

could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Substantially Increase Hazards Due to Geometric Design Feature or Introduce Incompatible Uses

Impact 3.17-3: The Specific Plan Program and Proposed Project would have less than significant and less than cumulatively considerable effects on substantially increasing hazards due to a geometric design feature or incompatible uses with mitigation incorporated.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Initial Study/Notice of Preparation and Final PEIR identified that the Specific Plan Program would redesign some intersections and implement road diets that would generally result in lane reduction to add a bicycle lane. A Road Diet could involve converting an existing four-lane undivided roadway segment to a three-lane segment consisting of two through lanes and a center two-way left-turn lane. The reduction of lanes allows the roadway cross section to be reallocated for other uses such as bike lanes, pedestrian refuge islands, transit stops, or parking. All development within the Specific Plan Program would be required to meet Los Angeles County design standards in relation to protection of pedestrian and bicycle traffic. In addition, the uses within the Specific Plan Program would be compatible with the surrounding mixed uses in the urban environment. As a result, less than significant impacts would occur from implementation of the Specific Plan Program.

Cumulative

The Final PEIR did not address cumulative impacts related to hazards due to a geometric design feature or incompatible uses because the Specific Plan Program would result in less than significant impacts related to transportation hazards. Therefore, the Specific Plan Program would result in a less than cumulatively considerable impact related to hazards due to a geometric design or incompatible feature.

Proposed Project Evaluation

Proposed Project-Specific

The Project site is zoned Mixed-Use and all proposed land uses are permitted within this zone and thus, the Proposed Project would not result in transportation hazards due to incompatible uses.

The Proposed Project includes site improvements which do not include roadway design features, such as sharp curves that could cause a safety hazard. As determined in the Transportation Study, access to the Project's parking areas would be provided by E. 117th Street, E. 117th Place and E. 118th Street. Two driveways would be located along E. 117th Street: one on the north side of the street providing access to the Projects' parking structure and one on the south side of the street providing access to the proposed office building's subterranean parking structure. Another two driveways would be located on the south side of E. 117th Place providing access to the affordable housing parking spaces. Lastly, a driveway would be located along E. 118th Street also providing access to the affordable housing parking spaces.

The Proposed Project driveways would be designed to ensure no hazardous design features related to vehicle and pedestrian mobility (sharp curves, line of sight obstructions) are included. The new driveways will not create sharp curves, sight-distance issues or a dangerous intersection. In addition, the Project driveways would be designed to remain clear of hardscapes, vegetation, or signage that would impede sight lines. Sidewalk treatments across the driveways would be incorporated for increased safety and visibility.

The Project site is located on a relatively flat parcel with little to no change in vertical elevation. Therefore, no line-of-sight issues would be caused by changes in elevation and drivers would be able to safely identify approaching vehicles, pedestrians, and bicycles at the Project driveways. The driveways would be configured to avoid or minimize potential conflicts with transit services and pedestrian traffic by providing curb and sidewalk to separate pedestrian movements from vehicular movements. The Proposed Project design features/physical configurations would not negatively affect the visibility of pedestrians and bicyclists to drivers entering and exiting the site, and the visibility of cars to pedestrians and bicyclists.

Furthermore, the Proposed Project includes vacating a portion of E. 118th Street along the southern boundary of the Project site. The street vacation would provide for safe pedestrian and bicycle mobility between the existing CDU campus and the Project site.

Based on the above, the Proposed Project would not substantially increase hazards due to a geometric design feature or incompatible use, and therefore, the Proposed Project would result in a less than significant impact.

Cumulative

A cumulative impact could occur if the combined effects of the Proposed Project and related project(s) with access points proposed along the same block would substantially increase hazards due to a geometric design feature or incompatible uses.

It was observed that there is one related project located along the same block, E. 117th Street, as the Proposed Project, refer to Table 3.0-1 of Section 3.0, *Environmental Setting, Impacts, and Mitigation Measures*. A review of the site plans of this related project and the Proposed Project was conducted. The related project is providing one driveway along the north side of E. 117th Street east of Compton Avenue. This driveway is located approximately 125 feet from the Proposed Project's driveways along E. 117th Street that it would have no effect of the Proposed Project's driveways operations. It was observed that the combined effects of the related projects and the Proposed Project would not substantially increase hazards due to a geometric design feature or incompatible uses. Therefore, the Proposed Project's impact would be less than cumulatively considerable related to creating a hazard due to a geometric design.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project would result in less than significant impacts related to hazards due to a geometric design feature or incompatible uses. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Result in Inadequate Emergency Access

Impact 3.17-4: The Specific Plan Program and Proposed Project would not impact and would not contribute to cumulative impacts related to inadequate emergency access.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Initial Study/Notice of Preparation and Final PEIR identified that the Specific Plan Program would redesign some intersections and implement road diets. The number of traffic lanes and roadway lane configurations would generally remain the same, except where road diets would be implemented. Roadway diets, described above, would generally result in lane reduction to add a bicycle lane. The Specific Plan Program would involve the reconfiguration of roadways and driveways to residential and commercial properties and would require the presence of construction equipment and materials adjacent to roadways. The Specific Plan Program requires the design of newly configured roadways and development sites to provide adequate emergency access. The changes to roadway patterns and driveways within the Specific Plan Program area would require construction permits from the County's Public Works Department, which would not allow development activities to result in potential impacts related to emergency access. As a result, impacts would be less than significant.

Cumulative

The Final PEIR did not address cumulative impacts related to inadequate emergency access because the implementation of any changes to roadways in accordance with the Specific Plan Program would require construction permits from the County's Public Works Department which would not allow development activities to result in potential impacts related to emergency access. Therefore, impacts from development in accordance with the Specific Plan Program would be less than cumulatively considerable.

Proposed Project Evaluation

Proposed Project-Specific

As discussed in the Transportation Study, fire access roads for emergency access are proposed within the Project site that extends from E. 117th Street to the proposed pedestrian promenade (E. 118th Street), as well as to E. 117th Place. Fire access roads from E. 117th Place and along the east

side of the proposed affordable housing buildings would also provide access to ground-level parking spaces for affordable housing residents and guests.

The Project site is north of the Los Angeles County Fire Department (LACFD) Station 41 and the access to the Martin Luther King Jr. (MLK) Community Hospital emergency department located along E. 120th Street. Project construction activities would not affect emergency access to these facilities. The Proposed Project would develop a construction traffic management plan in coordination with the MLK Community Hospital and LACFD to ensure that emergency vehicle access along E. 118th Street and E. 120th Street are maintained and that access to LCFD Station 41 and the MLK Medical Campus is not restricted. Therefore, construction and operation of the Proposed Project would not result in inadequate emergency access. The Proposed Project would result in no impacts.

Cumulative

As discussed, the Proposed Project would not result in inadequate emergency access. Therefore, the Proposed Project would not contribute to cumulative emergency access impacts.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project would not result in impacts related to inadequate emergency access. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

3.17.6 References

RAJU Associates, Inc. 2024. *Transportation Assessment Study for the Charles R. Drew University Wellness and Education Project* (Transportation Study). December 2023. See Appendix I of this Addendum to Final PEIR.

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3.18 Tribal Cultural Resources

3.18.1 Introduction

This section addresses tribal cultural resources, and the potential of the Proposed Project to impact those resources. This section includes a summary of the environmental setting and the identification of any applicable changes to the environmental setting that may have occurred since the certification of the Final PEIR. In addition, a summary of the applicable regulatory setting for tribal cultural resources is provided. This section also includes the thresholds of significance and a brief summary of the potential for impacts to tribal cultural resources. Finally, this section provides a conclusion of whether (1) the Proposed Project includes substantial changes that would require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact related to tribal cultural resources; (2) substantial changes in the circumstances under which the Proposed Project is undertaken would require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact related to tribal cultural resources; or (3) new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3) exist related to tribal cultural resources.

A Cultural Resources Assessment was prepared by Environmental Science Associates in August 2024. The Assessment is located in Appendix B of this Addendum to Final PEIR. In addition, the County of Los Angeles conducted consultation with Native American tribes pursuant to Senate Bill 18. The consultation information is also located in Appendix B.

3.18.2 Environmental Setting

The Specific Plan Program area is approximately 312 acres and is located within the northwestern portion of the Willowbrook community. The unincorporated community of Willowbrook encompasses approximately 3.8 square miles (2,410 acres) and is located approximately 10 miles south of downtown Los Angeles. The Specific Plan Program area generally encompasses parcels located south of Imperial Highway, north of East 122nd Street, east of Compton Avenue, and west of South Mona Boulevard.

A records search at the California Historical Resources Information System (CHRIS) South Central Coastal Information Center (SCCIC) housed at California State University, Fullerton was conducted for the Specific Plan Program on July 16, 2015. The records search included a review of all recorded resources, including archaeological sites and built environment resources, within a half-mile radius of the Specific Plan Program area, as well as a review of cultural resource reports on file. The records search indicated that 35 cultural resources studies have been conducted within a half-mile radius of the Specific Plan Program area. Of these 35 studies, 10 studies included a pedestrian survey of portions of the Specific Plan Program area, and one included archival research of a portion of the Specific Plan Program area. The records search indicated that

a total of nine cultural resources have been previously recorded within a half-mile radius of the Specific Plan Program area.

A Sacred Lands File (SLF) Search through the Native American Heritage Commission (NAHC) was conducted for the Specific Plan Program area in January 2017. The results of the SLF Search were negative.

The County of Los Angeles initiated Native American consultation pursuant to California PRC Section 21080.3.1, as amended by Assembly Bill 52 (AB 52). Consultation is required with Native American groups who are traditionally and culturally affiliated with the geographic area of the Specific Plan Program area, and who have requested such consultation in writing. The County mailed letters to the groups on February 2, 2017, inviting them to consult regarding potential impacts to tribal cultural resources.

The County Department of Regional Planning received letters from the Gabrieleno Band of Mission Indians – Kizh Nation (Tribe) on February 9. 2017 requesting consultation under Senate Bill (SB) 18 and AB 52. The County and Tribal representatives from the Gabrieleno Band of Mission Indians – Kizh Nation engaged in consultation via telephone on March 12, 2017, and in-person on April 4, 2017. The Tribe did not identify known cultural places located on land within the boundaries of the Specific Plan Program area that would be affected by the Specific Plan Program; however, the Tribe indicated that the Program area is sensitive for prehistoric and ethnohistoric Native American archaeological resources.

As part of the Cultural Resources Assessment prepared for the Proposed Project, a Sacred Lands File (SLF) Search through the Native American Heritage Commission (NAHC), a records search for the Project site was conducted at the SCCIC on June 28, 2023, and a cultural resources pedestrian survey of the Project site was conducted on July 17, 2023.

In July 2023, the NAHC responded to a request to search the SLF for the Project site. The NAHC identified that the results of the SLF search were negative. The records search included a review of all recorded cultural resources and previous studies within the Project site and a 0.50-mile radius. The records search results indicate that 18 cultural resources studies have been conducted within a 0.50-mile radius of the Project site. Approximately 15 percent of the 0.50-mile records search radius has been included in previous cultural resources surveys. Of the 18 previous studies, one (LA-00078) overlaps portions of the Project site. Study LA-00078 consisted of an *Evaluation of the Archaeological Resources and Potential Impact of the proposed Construction of Route 105 Freeway from El Segundo to Norwalk* and included a records search and a windshield survey, which yielded negative results. This study did not include an on-foot pedestrian survey. Based on the records search, no archaeological resources have been recorded within the Project site or 0.50-mile radius of the Project site. The records search results identified that one California Registered Historical Landmark has been previously recorded outside of the Project site. This resource is the Mojave Road which was a trail/road that ran from the Drum Barracks at Wilmington, followed north to Downtown Los Angeles, east toward San Bernardino, north over the Cajon Pass to the Mojave River, and across the Mojave Desert to the Nevada State Line. The resource has been described as unique for its significance as an Indian trail, a federal government supply, a freight

and emigrant wagon route, and a recreational trail. In addition to the record searches, a cultural resources pedestrian survey of the Project site was conducted on July 17, 2023. No archaeological resources were observed.

3.18.3 Regulatory Setting

Assembly Bill 52 and Related Public Resources Code Sections

Assembly Bill (AB) 52 was approved by California State Governor Edmund Gerry "Jerry" Brown, Jr. on September 25, 2014 (California Legislative Information, 2024). The act amended California PRC Section 5097.94, and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. AB 52 applies specifically to projects for which a Notice of Preparation (NOP) or a Notice of Intent to Adopt a Negative Declaration or Mitigated Negative Declaration (MND) will be filed on or after July 1, 2015. The primary intent of AB 52 was to include California Native American Tribes early in the environmental review process and to establish a new category of resources related to Native Americans that require consideration under CEQA, known as tribal cultural resources. PRC Section 21074(a)(1) and (2) defines tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe" that are either included or determined to be eligible for inclusion in the California Register or included in a local register of historical resources, or a resource that is determined to be a tribal cultural resource by a lead agency, in its discretion and supported by substantial evidence. On July 30, 2016, the California Natural Resources Agency adopted the final text for tribal cultural resources update to Appendix G of the CEQA Guidelines, which was approved by the Office of Administrative Law on September 27, 2016.

PRC Section 21080.3.1 requires that within 14 days of a lead agency determining that an application for a project is complete, or a decision by a public agency to undertake a project, the lead agency provide formal notification to the designated contact, or a tribal representative, of California Native American Tribes that are traditionally and culturally affiliated with the geographic area of the project (as defined in PRC Section 21073) and who have requested in writing to be informed by the lead agency (PRC Section 21080.3.1(b)). Tribes interested in consultation must respond in writing within 30 days from receipt of the lead agency's formal notification and the lead agency must begin consultation within 30 days of receiving the tribe's request for consultation (PRC Sections 21080.3.1(d) and 21080.3.1(e)).

PRC Section 21080.3.2(a) identifies the following as potential consultation discussion topics: the type of environmental review necessary; the significance of tribal cultural resources; the significance of the project's impacts on the tribal cultural resources; project alternatives or appropriate measures for preservation; and mitigation measures. Consultation is considered concluded when either: (1) the parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or (2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached (PRC Section 21080.3.2(b)).

If a California Native American tribe has requested consultation pursuant to Section 21080.3.1 and has failed to provide comments to the lead agency, or otherwise failed to engage in the consultation process, or if the lead agency has complied with Section 21080.3.1(d) and the California Native American tribe has failed to request consultation within 30 days, the lead agency may certify an EIR or adopt an MND (PRC Section 21082.3(d)(2) and (3)).

PRC Section 21082.3(c)(1) states that any information, including, but not limited to, the location, description, and use of the tribal cultural resources, that is submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public without the prior consent of the tribe that provided the information. If the lead agency publishes any information submitted by a California Native American tribe during the consultation or environmental review process, that information shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public.

Senate Bill 18

Senate Bill 18 (SB 18) (Statutes of 2004, Chapter 905), which went into effect January 1, 2005, requires local governments (city and county) to consult with Native American tribes before making certain planning decisions and to provide notice to tribes at certain key points in the planning process. The intent is to "provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places" (Governor's Office of Planning and Research, 2005).

The purpose of involving tribes at these early planning stages is to allow consideration of cultural places in the context of broad local land use policy, before individual site-specific, project-level, land use designations are made by a local government. The consultation requirements of SB 18 apply to general plan or specific plan processes proposed on or after March 1, 2005.

According to the Tribal Consultation Guidelines: Supplement to General Plan Guidelines (Governor's Office of Planning and Research, 2005), the following are the contact and notification responsibilities of local governments:

- Prior to the adoption or any amendment of a general plan or specific plan, a local government must notify the appropriate tribes (on the contact list maintained by the NAHC) of the opportunity to conduct consultations for the purpose of preserving, or mitigating impacts to, cultural places located on land within the local government's jurisdiction that is affected by the proposed plan adoption or amendment. Tribes have 90 days from the date on which they receive notification to request consultation, unless a shorter timeframe has been agreed to by the tribe (Government Code Section 65352.3).
- Prior to the adoption or substantial amendment of a general plan or specific plan, a local government must refer the proposed action to those tribes that are on the NAHC contact list and have traditional lands located within the city or county's jurisdiction. The referral must allow a 45-day comment period (Government Code Section 65352). Notice must be sent regardless of whether prior consultation has taken place. Such notice does not initiate a new consultation process.

- Local government must send a notice of a public hearing, at least 10 days prior to the hearing, to tribes who have filed a written request for such notice (Government Code Section 65092).

3.18.4 Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines and the County of Los Angeles Environmental Checklist Form, the project could have a significant on tribal cultural resources if it would:

- Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is Listed or eligible for listing in the California Register of Historic Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k) (see Impact 3.18-1, below).
- Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe (see Impact 3.18-2, below).

3.18.5 Impact Analysis

Listed Tribal Cultural Resources

Impact 3.18-1: The Specific Plan Program and Proposed Project would not result in impacts or contribute to cumulative impacts to tribal cultural resources listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5024.1 (k).

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Final PEIR identified that according to letters received from the NAHC, dated January 30, 2017, the SLF records returned negative results. Additionally, a records search for the Specific Plan Program area was conducted on July 16, 2015, at the California Historical Resources Information System (CHRIS) South Central Coastal Information Center (SCCIC) indicating that a total of 35 cultural resources studies have been conducted within a half-mile radius of the Specific Plan Program area. Of these 35 studies, 10 studies included a pedestrian survey of portions of the Specific Plan Program area, and one included archival research of a portion of the Specific Plan Program area. The records search indicated that nine cultural resources have been previously recorded within a half-mile record search study area surrounding the Specific Plan Program area. Of the nine resources, two (19-187085 and LAN-19-187545) are located within the

Specific Plan Program area. However, these two resources are not listed or eligible for listing in the California Register of Historic Places or in a local register of historical resources. No listed or eligible for listing cultural resources have been recorded within the Specific Plan Program area or within a half mile of the Specific Plan Program area. Therefore, the Specific Plan Program would not impact a listed tribal cultural resource and no impact would occur.

Cumulative

The Final PEIR identified that cumulative development could result in significant cumulative impacts on tribal cultural resources due to the substantial tribal cultural resources known to occur in the general vicinity of the Specific Plan Program area. Because there are no known tribal cultural resources that have been located within the Specific Plan Program area, the Specific Plan Program would not contribute to cumulative impact on tribal cultural resources listed or eligible for listing.

Proposed Project Evaluation

Proposed Project-Specific

No tribal cultural resources were identified on the Project site during an updated Sacred Lands File Search through the NAHC and a records search through the SCCIC as part of the Cultural Resources Assessment conducted in August 2024. Therefore, like the Specific Plan Program, the Proposed Project would not impact a tribal cultural resource listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources.

Cumulative

Although there is a potential for cumulative projects to impact tribal cultural resources that are listed or eligible for listing, the Proposed Project does not have any tribal cultural resources that are listed or eligible for listing. Therefore, as with the Specific Plan Program, the implementation of the Proposed Project would not impact tribal cultural resources listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the implementation of the Proposed Project would not impact tribal cultural resources listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in the severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Non-Listed Tribal Cultural Resources

Impact 3.18-2: The Specific Plan Program and Proposed Project could result in significant and cumulatively significant impacts to a resource of a California Native American tribe determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

Based on the County's Assembly Bill 52 and Senate Bill 18 consultation with the Gabrieleno Band of Mission Indians – Kizh Nation Tribe, the Tribe did not identify known tribal cultural resources; however, the Tribe indicated that the Specific Plan Program area is sensitive for prehistoric and ethnohistoric Native American archaeological resources. Although no tribal cultural resources have been identified within the Specific Plan Program area, there is a potential for buried unknown archaeological resources that may be defined as a tribal cultural resource. If previously undiscovered artifacts or remains are uncovered during excavation or construction, significant tribal cultural resource impacts could occur. The implementation of Mitigation Measures CUL-5 through CUL-7 (drafted by the Gabrieleno Band of Mission Indians – Kizh Nation during consultation) would reduce potential tribal cultural resources associated with the Specific Plan Program to less than significant.

Cumulative

As development occurs within the cumulative area, potential impacts to archaeological resources could occur due to the substantial tribal cultural resources known to occur in the area. These potential impacts by cumulative development could represent significant cumulative impacts on archaeological resources that may be defined as tribal cultural resources. Because the Specific Plan Program could result in significant impacts to unknown archaeological resources that could be defined as tribal cultural resources, the Specific Plan Program's contribution to cumulative impacts to tribal cultural resources would be cumulatively considerable.

Proposed Project Evaluation

Proposed Project-Specific

Although the County's Assembly Bill 52 and Senate Bill 18 consultation with the Gabrieleno Band of Mission Indians – Kizh Nation Tribe did not identify known tribal cultural resources; the Tribe indicated that the Specific Plan Program area (which includes the Project site) is sensitive for prehistoric and ethnohistoric Native American archaeological resources. Although no tribal cultural resources have been identified within the Project site, there is a potential for buried unknown archaeological resources that may be defined as a tribal cultural resource. If previously undiscovered artifacts or remains are uncovered during excavation or construction, significant tribal cultural resource impacts could occur.

Because the Proposed Project includes a Specific Plan Amendment, the County of Los Angeles conducted consultation with Native American tribes in accordance with Senate Bill 18. The County requested a list of tribes from the Native American Heritage Commission and received a

list on March 20, 2025. Consultation letters were emailed by the County of Los Angeles to eight tribes on March 26, 2025. According to Senate Bill 18, the tribes had a 90-day comment period that ended June 24, 2025. No comments from Native American tribes were received. Therefore, no additional impacts beyond the tribal cultural resources discussed above would occur.

Cumulative

As development occurs within the cumulative area, potential impacts to archaeological resources could occur due to the substantial tribal cultural resources known to occur in the area. These potential impacts by cumulative development could represent significant cumulative impacts on archaeological resources that may be defined as tribal cultural resources. Because the Proposed Project could result in significant impacts to unknown tribal cultural resources, the Proposed Project's contribution to cumulative impacts to tribal cultural resources would be cumulatively considerable.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, Mitigation Measures CUL-5 and CUL-7 (as revised in Section 3.5 of this Addendum to Final PEIR) are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project would result in less than significant impacts to tribal cultural resources with the implementation of Mitigation Measures CUL-5 through CUL-7. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in the severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

3.18.6 References

California Legislative Information. 2024. Assembly Bill No. 52. Available at: https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201320140AB52&search_keywords=. Accessed on August 25, 2024.

Environmental Science Associates. 2024. Cultural Resources Assessment Report for CMWC Wellness Campus Development Project. August. Available in Appendix B of this Addendum to Final PEIR.

3.19 Utilities and Service Systems

3.19.1 Introduction

This section addresses utility and service systems related to new or expanded utility systems, water supplies, wastewater treatment capacity, landfill capacity, and compliance with regulatory agency solid waste reduction statutes and regulations, and the potential of the Proposed Project to impact the existing systems. This section includes a brief summary of the environmental setting included in the Final PEIR, and the identification of any applicable changes to the utilities and service systems' setting that may have occurred since the certification of the Final PEIR. In addition, a brief summary of the regulatory setting included in the Final PEIR and any substantive revisions to the regulatory setting that has occurred since the certification of the Final PEIR. This section also includes the thresholds of significance and a brief summary of the utilities and service system impacts and mitigation measures addressed in the Final PEIR as well as the potential utilities and service systems associated with the Proposed Project. Finally, this section provides a conclusion of whether (1) the Proposed Project includes substantial changes that would require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact related to utilities and service systems; (2) substantial changes in the circumstances under which the Proposed Project is undertaken would require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact related to utilities and service systems; or (3) new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3) exist related to utilities and service systems.

3.19.2 Environmental Setting

Water Services

The Specific Plan Program area is served by three different water purveyors, Liberty Utilities – Park Water, Golden State Water Company, and the City of Los Angeles Department of Water and Power (LADWP). The Project site is served by Liberty Utilities – Park Water (Liberty).

Liberty relies on a combination of imported water, local groundwater, and recycled water to meet its water needs. Liberty works together with two primary agencies, Central Basin Municipal Water District (CBMWD) and the Water Replenishment District of Southern California (WRD) to ensure a safe and reliable water supply that will continue to serve the community in periods of drought and shortage. The sources of imported water supplies provided by Metropolitan Water District of Southern California (Metropolitan) via Liberty's Metropolitan member agency, CBMWD, include the Colorado River and the State Water Project. Liberty's other main source of water supply is groundwater from the Central Basin managed by WRD. While usage between imported and groundwater supply varies from year to year, over the past dozen years Liberty has averaged an approximately equal percentage of groundwater (44 percent) and imported water (56 percent). However, going forward Liberty is projecting to gradually reduce dependence on imported water and use a higher percentage of local groundwater with the mix estimated at just

over 60 percent groundwater by 2045. Liberty also has a limited amount of recycled water available from the Sanitation Districts of Los Angeles County through the Central Basin Municipal Water District; however, recycled water infrastructure is not located in the vicinity of the Project site to supply recycled water to the Project site.

According to the 2020 UWMP, the Liberty water service area population was 132,691 in 2020 and is estimated to increase to 136,245 by 2045 (Stetson Engineers, Inc. 2021). These population figures were obtained from Southern California Association of Government (SCAG). The data provided by SCAG was based on "The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy of the SCAG", dated September 2020, and incorporates demographic trends, existing land use, general plan land use policies, and input and projections through the year 2045 from the Department of Finance (DOF) and the U.S. Census Bureau for counties, cities and unincorporated areas within Southern California.

The 2020 UWMP included a projected water supply and demand increase of 361 acre-feet per year (AFY) between 2020 and 2035 that would serve a population of approximately 2,128 people. The 2020 UWMP also projected a water supply and demand increase of 482 AFY between 2020 and 2045 that would serve a population of approximately 3,554 people.

Existing water facilities that are located within the vicinity of the Project site include water mains along E. 117th Street (4-inch diameter and 6-inch diameter), E. 117th Place (4-inch diameter), E. 118th Street (10-inch diameter), and Compton Avenue (8-inch diameter). In addition, there are existing fire hydrants located along E. 117th Street, E. 118th Street and Compton Avenue.

Wastewater Services

The existing sewer system within the Specific Plan Program area and the Project site is owned and maintained by the County of Los Angeles Department of Public Works (LACDPW) and Sanitation Districts of Los Angeles County (LACSD). The existing facilities include a 27-inch truck sewer main along Compton Avenue that conveys stormwater from north to south. There are two sewer lines along E. 118th Street. The first sewer line is an existing 30-inch truck sewer main and the second is an 8-inch sewer main. On E. 118th Street, there is an existing 8-inch Sewer Maintenance District (SMD) vitrified clay pipe (VCP) sewer main that has a high point that splits the flow east and west of manhole 110 that is located approximately 645 feet east of Compton Avenue. Also along E. 118th Street, there is an existing 30-inch LACSD reinforced concrete pipe (RCP) trunk sewer main north of the 8-inch sewer pipe flowing east. . Along E. 117th Street and E. 117th Place, there are existing 8-inch sewer mains. The existing sewer main on E. 117th Street conveys wastewater from west to east. The existing sewer main along E. 117th Place conveys wastewater from east to west.

Wastewater from the Specific Plan Program area including the Project site is collected and treated at the A.K. Warren Water Resource Facility (formerly known as Joint Water Pollution Control Plant [JWPCP]) in Carson. The JWPCP is located in the City of Carson just east of the I-110 freeway. The plant provides primary and secondary treatment for approximately 280 MGD and has a total permitted capacity of 400 MGD and serves over 4.8 million residents, businesses and industries in Los Angeles County (Los Angeles County Sanitation Districts, 2024). Effluent from JWPCP is disinfected and discharged into the Pacific Ocean through a network of outfalls.

Storm Drains

The main lines of the storm drain system within the Specific Plan Program area as well as the vicinity of the Project site are owned and maintained by the County of Los Angeles Flood Control District (LACFCD). The Project site is located within an urbanized vicinity with a developed storm drain system. The existing facilities in the vicinity of the Project site include a reinforced concrete pipe (RCP) storm drain main on Compton Avenue to the west. Existing catch basins are located along Compton Avenue and E. 118th Street, near the intersections of E. 118th Street and Compton Avenue. Additionally, there are minimal on-site catch basins and area basins located on the Project site, but these onsite basins will be removed and replaced with the proposed drainage facilities. Furthermore, the existing curbs and gutters along E. 117th Street, E. 117 Place, and E. 118th Street convey storm water to existing offsite catch basins. Stormwater from the Specific Plan Program area including the Project site is conveyed to the east into the Los Angeles River next to the I-710 freeway and eventually discharges into the ocean.

Solid Waste Services

The LACSD operates solid waste collection facilities in the Specific Plan Program area. LACSD solid waste management sites provide about half of the countywide solid waste management needs. The District operates two sanitary landfills, four landfill energy recovery facilities, two recycle centers, and three materials recovery/transfer facilities, and participate in the operation of two refuse-to-energy facilities.

Solid waste in the community of Willowbrook including the Specific Plan Program area is taken to two recycling and transfer facilities: the Downey Area Recycling and Transfer facility and the South Gate Transfer Station facility. The Downey Area Recycling & Transfer facility is located at 9770 Washburn Road in the City of Downey, which is located approximately 7 miles east of the proposed Specific Plan Program area, and has a daily maximum permitted throughput capacity of 5,000 tons of waste per day. The South Gate Transfer Station is located at 530 South Garfield Avenue in the City of South Gate, approximately 4 miles northeast of the Specific Plan Program area, and has a daily maximum permitted throughput capacity of 1,000 tons of waste per day.

Electric Power Services

Southern California Edison (SCE) currently serves the Specific Plan Program area including the Project site. The existing SCE electrical distribution system in the vicinity of the Project site includes power poles and overhead power lines located along the public roadways (Compton Avenue, E. 118th Street, E. 117th Place, and E. 117th Street).

Natural Gas Service

Southern California Gas Company currently serves the Specific Plan Program area including the Project site. The existing gas lines located adjacent to the Project site include 2-inch and 3-inch gas mains along E. 117th Street, E. 117th Place, E. 118th Street and along Compton Avenue.

Telecommunication Services

Telecommunication services in the Project vicinity are provided by Spectrum. The Spectrum data and communication system is composed of utility poles and overhead cable systems with very limited underground systems located along the public roadways (Compton Avenue, E. 118th Street., E. 117th Place., and E. 117th Street.) adjacent to the Project site.

3.19.3 Regulatory Setting

The following are the utility and service system regulations applicable to the Proposed Project.

Federal

Safe Drinking Water Act

The United States Environmental Protection Agency (USEPA) administers the Safe Drinking Water Act, which is the primary federal law that regulates the quality of drinking water and establishes standards to protect public health and safety. The Department of Health Services (DHS) implements the requirements of the Act and oversees public water system quality statewide. DHS establishes legal drinking water standards for contaminates that could threaten public health.

National Pollution Discharge Elimination System Permits

The NPDES permit system was established in the CWA to regulate both point source discharges (a municipal or industrial discharge at a specific location or pipe) and nonpoint source discharges (diffuse runoff of water from adjacent land uses) to surface waters of the United States. For point source discharges, such as sewer outfalls, each NPDES permit contains limits on allowable concentrations and mass emissions of pollutants contained in the discharge.

Clean Water Act

The Clean Water Act established the basic structure for regulating discharges of pollutants into "waters of the U.S." The act specifies a variety of regulatory and non-regulatory tools to manage stormwater runoff. Clean Water Act Section 402 is relevant to drainage in the proposed Specific Plan Program.

Section 402 regulates point- and nonpoint-source discharges to surface waters through the National Pollutant Discharge Elimination System (NPDES) program. In California, the State Water Resources Control Board (SWRCB) oversees the NPDES program, which is administered by the RWQCBs. The NPDES program provides for both general permits (those that cover a number of similar or related activities) and individual permits.

State

California Urban Water Management Planning Act

Section 10610 of the California Water Code established the California Urban Water Management Planning Act (CUWMPA), requires urban water suppliers to initiate planning strategies to ensure an appropriate level of reliability in its water service. CUWMPA states that every urban water

supplier that provides water to 3,000 or more customers, or that annually provides more than 3,000 acre-feet of water service, should make every effort to ensure the appropriate level of reliability in its water service to meet the needs of its various categories of customers during normal, dry, and multiple-dry years. The CUWMPA describes the contents of Urban Water Management Plans as well as methods for urban water suppliers to adopt and implement the plans.

SB 610 – Costa Water Supply Planning

In 2001, SB 610 required that a city or county approving certain projects subject to CEQA (i) identify any public water system that may supply water for the project, and (ii) request those public water systems to prepare a specified water supply assessment. The assessment shall determine if the projected water supplies will be sufficient to satisfy the demands of the project, in addition to existing and planned future uses.

SBx7-7 Requirements

In February 2008, the California legislature introduced a seven part comprehensive plan for improving the Sacramento-San Joaquin Delta. As part of that effort, several state agencies were directed to develop a plan to reduce per capita water use state-wide by 20 percent by the year 2020. Legislation titled the "Water Conservation Act of 2009" (SBx7-7) enacted the 20 x 2020 concept. As part of the 20 x 2020 plan, all retail water agencies in the state are required to detail how they plan to achieve the mandatory reductions through their UWMP. Retail water agencies who have either 3,000 or more connections or provide 3,000 AF or more of water per year, are required to be in compliance with SBx7-7.

CalGreen Building Code

California Code of Regulations Title 24, Part 11, establishes the California Green Building Code or CALGreen. The CALGreen Code was recently updated in 2022 and went into effect January 1, 2023. CALGreen sets forth water efficiency standards (i.e., maximum flow rates) for all new federally-regulated plumbing fittings and fixtures.

California Water Resources Control Board Low Impact Development Policy

The SWRCB adopted the Low Impact Development (LID) Policy which, at its core, promotes the idea of "sustainability" as a key parameter to be prioritized during the design and planning process for future development. The SWRCB has directed its staff to consider sustainability in all future policies, guidelines, and regulatory actions. LID is a proven approach to manage stormwater. The RWQCBs are advancing LID in California in various ways, including provisions for LID requirements in renewed Phase I municipal stormwater NPDES permits.

California Integrated Waste Management Act of 1989 (AB 939)

The California Integrated Waste Management Act of 1989 (AB 939) redefined solid waste management in terms of both objectives and planning responsibilities for local jurisdictions and the state. AB 939 was adopted in an effort to reduce the volume and toxicity of solid waste that is landfilled and incinerated by requiring local governments to prepare and implement plans to improve the management of waste resources. AB 939 required each of the cities and unincorporated portions of the counties to divert a minimum of 25 percent of the solid waste sent

to landfills by 1995 and 50 percent by the year 2000. To attain goals for reductions in disposal, AB 939 established a planning hierarchy utilizing new integrated solid waste management practices. These practices include source reduction, recycling and composting, and environmentally safe landfill disposal and transformation. Other state statutes pertaining to solid waste include compliance with the California Solid Waste Reuse and Recycling Act of 1991 (AB 1327), which requires adequate areas for collecting and loading recyclable materials within a Project site. As a new waste generator, the Proposed Project would be subject to the requirements of these solid waste provisions, as enforced by the County of Los Angeles.

California Senate Bill 1383

In September 2016, Governor Brown signed SB 1383 that establishes targets to achieve a 50 percent reduction in the level of the statewide disposal of organic waste from the 2014 level by 2020 and a 75 percent reduction by 2025.

Regional

Regional Municipal Separate Storm Sewer System (MS4) Permits

The County of Los Angeles is a co-permittee under the NPDES stormwater permit covering Los Angeles County (NPDES No. CAS614001). The MS4 Permit was adopted on November 8, 2012, and amended on September 8, 2016. The MS4 Permit requires permittees to reduce the discharge of storm water pollutants to the maximum extent practicable and ensure MS4 discharges do not cause or contribute to violations of water quality standards. The MS4 Permit also requires implementation of various site design best management practices (BMPs) and treatment control BMPs to reduce the possibility of pollutants stored or produced on-site from entering surface water or sewer system.

Regional Water Quality Control Board

Each RWQCB is required to develop, adopt, and implement a Basin Plan for its respective region. The Basin Plan is the master policy document that contains descriptions of the legal, technical, and programmatic bases of water quality regulation in each region. Basin Plans identify beneficial uses of surface waters and groundwater within the corresponding region; specify water quality standards, known as water quality objectives, for both surface water and groundwater; and develop the actions necessary to maintain the standards to control nonpoint and point sources of pollutants to the state's waters. All discretionary projects requiring permits from the RWQCB (i.e., waste and pollutant discharge permits) must implement Basin Plan requirements (i.e., water quality standards), taking into consideration the beneficial uses to be protected.

The Specific Plan Program Area is located within the jurisdiction of LARWQCB, and the proposed Specific Plan Program is subject to the LARWQCB's Water Quality Control Plan.

Local

Los Angeles County Integrated Waste Management Plan

The California Integrated Waste Management Act of 1989 (AB 939) requires that the responsibility for solid waste management be shared between state and local governments. The State of California has directed the County to prepare and implement a local integrated waste management plan in accordance with AB 939. The Los Angeles County Integrated Waste Management Plan Executive Summary presents the County-wide goals and objectives for integrated solid waste management and describes the County's system of governmental solid waste management infrastructure and the current system of solid waste management in the cities and unincorporated areas of the County. This document also summarizes the types of programs planned for individual jurisdictions and describes countywide programs that could be consolidated.

The Los Angeles County Integrated Waste Management Plan, 2015 Annual Report on the Countywide Summary Plan and Countywide Siting Element, describes the County's approach to dealing with a broad range of solid waste issues, including processing capacity; markets for recovered materials; waste reduction mandates; waste disposed at Class I (i.e., hazardous waste–only landfills) and Class II (i.e., landfills that accept specified hazardous waste and non-hazardous wastes) disposal facilities; allocation of "orphan" waste (waste that comes from an unknown origin); the accuracy of the State Disposal Reporting System (DRS); and the California Integrated Waste Management Board (CIWMB) enforcement policy. This document also includes the Los Angeles County Integrated Waste Management strategies to maintain adequate solid waste disposal capacity through 2030. The Proposed Project would be subject to the Los Angeles County Integrated Waste Management Plan.

Los Angeles County General Plan

The following goals and policies in the Public Services and Facilities Element of the General Plan address are applicable to the proposed Specific Plan Program (Los Angeles County General Plan, 2015).

Effective Service and Facilities Planning and Maintenance

Goal 1: A coordinated, reliable, and equitable network of public facilities that preserves resources, ensures public health and safety, and keeps pace with planned development.

Policy 1.1: Discourage development in areas without adequate public services and facilities.

Policy 1.2: Ensure that adequate services and facilities are provided in conjunction with development through phasing or other mechanisms.

Policy 1.5: Focus infrastructure investment, maintenance and expansion efforts where the General Plan encourages growth, such as TODs.

Drinking Water

Goal 2: Increased water conservation efforts.

Policy 2.1: Implement water conservation measures, such as drought tolerant landscaping and restrictions on water used for landscaping.

Policy 3.2: Support the increased production, distribution and use of recycled water, gray water, and rainwater harvesting to provide for groundwater recharge, seawater intrusion barrier injection, irrigation, industrial processes and other beneficial uses.

Solid Waste

Policy 5.1: Maintain an efficient, safe and responsive waste management system that reduces waste while protecting the health and safety of the public.

Policy 5.7: Encourage the recycling of construction and demolition debris generated by public and private projects.

Policy 6.7: Encourage projects that incorporate onsite renewable energy systems.

3.19.4 Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines and the County of Los Angeles Environmental Checklist Form, the project could have a significant on utilities and service systems if it would:

- Require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water draining, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects (see Impact 3.19-1, below);
- Not have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years (see Impact 3.19-2, below);
- Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments (see Impact 3.19-3, below);
- Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals (see Impact 3.19-4, below);
- Not comply with federal, state, and local statutes and regulations related to solid waste (see Impact 3.19-5, below).

3.19.5 Impact Analysis

New or Expanded Water, Wastewater Treatment, Stormwater Drainage, Electric Power, Natural Gas, or Telecommunications Facilities

Impact 3.19-1: The Specific Plan Program and Proposed Project would result in less than significant and less than cumulatively considerable impacts on the relocation or construction of new or expanded water or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

Water Facilities

The Final PEIR identified that development in accordance with the Specific Plan Program would increase the demand on water supply and require improvements to the existing water facilities within the Specific Plan Program area. Most of the existing water pipelines in the Specific Plan Program area are 8-inch diameter and above and have the capacity to accommodate the increase in water demand associated with Specific Plan Program buildout. As part of the Specific Plan Program, there is a water supply system that includes upgrades of existing water lines. The lines identified for upgrade to serve buildout in the vicinity of the Project site include the existing lines along E. 117th Street and E. 117th Place. The Final PEIR identified that with the water supply system that is part of the Specific Plan Program, there are no additional areas of water infrastructure that would need to be improved to serve the Specific Plan Program area at buildout. Therefore, the Specific Plan Program would result in no impacts related to water infrastructure expansion beyond the improvements that are part of the project.

Wastewater Facilities

The Final PEIR identified that the increase in intensity of land uses within the Specific Plan Program area would increase the generation of wastewater flows. The Final PEIR identified that the Specific Plan Program is projected to generate approximately 1.4 million gallons per day (mgd). The trunk sewers that serve the Specific Plan Program area are flowing at 12 – 25 percent of their maximum capacity. In addition, the JWPCP has a 400 mgd treatment capacity and the average daily discharge after treatment is 251 mgd (California LARWQCB, 2023). Therefore, the JWPCP has excess treatment capacity of approximately 149 mgd and would have sufficient capacity to process the additional average wastewater flow of approximately 1.4 mgd that would be generated by the Specific Plan Program at buildout. Therefore, the proposed Specific Plan Program would not increase wastewater generation such that the existing capacity at JWPCP would be exceeded, and would, therefore, not require the construction or expansion of existing wastewater treatment facilities, which could cause significant environmental effects.

An evaluation of the projected wastewater flow from the proposed land uses to the existing sewer trunk sewers within the Specific Plan Program was conducted. The evaluation identified projected wastewater generated by proposed land uses in the northern and central portions of the

Specific Plan Program would exceed the existing capacities in the trunk sewers along Wilmington Avenue and Mona Boulevard in the northern portions of the Specific Plan Program and along Willowbrook Avenue in the central portion of the Specific Plan Program. Therefore, the implementation of the Specific Plan Program would result in the need to upgrade the existing trunk sewers which could cause significant environmental effects associated with air quality and greenhouse gas emissions, noise and traffic safety during construction activities. To reduce potential impacts to wastewater facilities, implementation of Mitigation Measure USS-1 would require individual applicants to submit a sewer study to confirm that existing trunk sewers have adequate capacity to accommodate the individual project's wastewater flow. The implementation of Mitigation Measure UUS-1 would reduce potential impacts to less than significant.

Stormwater Drainage Facilities

The Final PEIR stated that buildout of the Specific Plan Program area is expected to generate little or no increase in runoff to the existing drainage system because the majority of the area is developed and approximately 80 to 90 percent of the existing Specific Plan Program area is impervious. Project development is not expected to directly trigger any need for upgrades to the County's existing storm drain major backbone facilities, mainly due to the Low Impact Development (LID) Ordinance requirements for percolation and on-site detention for new development, which will stabilize and/or even reduce runoff in the area. The Final PEIR identified that the County does not recommend an upgrade of the existing storm drain system within the Specific Plan Program area. Impacts related to exceeding the capacity of existing and planned storm drains would be less than significant.

Electric Power, Natural Gas, or Telecommunications Facilities

The Final PEIR stated that site-specific developments in compliance with the Specific Plan Program would generate demand for electricity and natural gas. The land uses that are part of the Specific Plan Program including residential, mixed use, medical, educational and commercial would involve energy consumption quantities that are typical for urban infill development, and no operational activities or land uses would occur that would result in extraordinary energy consumption. Because the Specific Plan Program includes development within an urbanized area, electricity and natural gas infrastructure exist for the new development to connect to; implementation of the proposed Specific Plan Program would not result in the need to develop or extend electricity or natural gas infrastructure to serve buildout. Furthermore, buildout of the proposed Specific Plan Program would not create energy utility system capacity problems or require new or expanded entitlements. Thus, the Specific Plan Program would not result in impacts to energy infrastructure and services. Although the Final PEIR did not address telecommunication facilities, the Specific Plan Program includes development within an urbanized area where telecommunication facilities exist. Therefore, development in accordance with the Specific Plan Program would not result in impacts to telecommunication facilities.

Cumulative

The Final PEIR identified that cumulative development within the water service areas would include infill and redevelopment projects. These cumulative projects could result in the need for new or upgraded water infrastructure. The construction activities associated with new or upgraded water facilities could result in significant environmental impacts. Infrastructure needs

for water service within the Specific Plan Program area was conducted and improvements to existing water service pipelines were included with the Specific Plan Program to ensure that future development implemented in accordance with the Specific Plan Program would be served by adequate infrastructure. Because the Specific Plan Program would not require the construction of water facilities beyond the improvements that are part of the Program, the Specific Plan Program would not contribute to potential cumulative impacts associated with water infrastructure.

Cumulative wastewater infrastructure impacts are considered on a system-wide basis and are associated with the capacity of existing and planned infrastructure. The trunk sewers that serve the Specific Plan Program area are flowing at 12 – 25 percent of their maximum capacity, and the JWPCP has an excess treatment capacity of approximately 149 mgd, respectively. Although the trunk sewers that are located within the Specific Plan Program area currently have excess capacity, wastewater from the Specific Plan Program land uses is projected to exceed the existing capacities of the trunk sewers within the Specific Plan Program area. In addition, downstream trunk sewers to the JWPCP could require upgrades or expansions as cumulative development occurs. These improvements could result in significant environmental impacts associated with air quality and greenhouse gas emissions, noise and traffic safety during construction activities. Therefore, cumulative development could result in significant cumulative impacts associated with upgrading trunk sewers. Because the Specific Plan Program could also result in significant impacts associated with upgrading trunk sewers within the Specific Plan Program area, the Specific Plan Program's contribution to cumulative impacts associated with wastewater infrastructure upgrades would be cumulatively considerable. The implementation of Mitigation Measure USS-1 would reduce the Specific Plan Program's potential impact to less than significant.

The Final PEIR stated that the geographic scope for cumulative impacts related to stormwater drainage capacity includes the drain facilities that are located downstream of the Specific Plan Program area. As cumulative development is implemented, compliance with the LID Ordinance requirements for percolation and on-site detention will be required. Compliance with these requirements will reduce the need for downstream drainage facility improvements. Therefore, cumulative development would result in less than significant cumulative impacts on the capacities of existing or planned storm drains. Because the Specific Plan Program would be required to implement the LID Ordinance requirements, the project's contribution to cumulative impacts on the capacities of existing and planned storm drains would be less than cumulatively considerable.

Cumulative development would increase the need for electricity and natural gas. However, it is anticipated that this incremental increase would be reduced with the implementation of existing energy conservation regulations. Cumulative energy utility system capacity problems would not result since cumulative development in the vicinity of the Specific Plan Program area is located within an urbanized area with existing facilities. The construction of new or expanded energy facilities for cumulative development is not expected to be required from the related infill development within the urban and developed region. Therefore, impacts from cumulative projects associated with energy facilities would be less than significant. Similarly, new or expanded telecommunication facilities for cumulative development are not expected to be required because

the cumulative development is located within an urbanized area where telecommunication facilities exist. Because the Specific Plan Program would not result in impacts to electricity, natural gas, or telecommunication facilities, the Specific Plan Program would not contribute to potential cumulative impacts to these facilities.

Proposed Project Evaluation

Proposed Project-Specific

Water Facilities

Development of the Proposed Project will result in an increase in water demand on the Project site. Based on the Water Supply Assessment (WSA) prepared for the Proposed Project (see Appendix I of this Addendum to Final PEIR), the potable and irrigation water demand for the Project site is approximately 92.4 acre-feet per year (AFY). The potable water demand includes a demand from a residential population of 1,431 residents which is a reduced projection of residents compared to the 1,644 residents assumed in Section 3.14, Population and Housing, in this Addendum to Final PEIR. The 1,644 residents estimate in Section 3.14 used a general population estimate of 2.94 persons per unit while the WSA prepared for the Proposed Project based its residential population on the number of bedrooms for each residential unit which is more accurate than the general estimate used in Section 3.14. The Proposed Project includes 4-inch diameter and 6-inch diameter water lines that would connect to the existing lines located along E. 117th Street, E. 118th Street, and Compton Avenue. The proposed water lines would connect to each of the proposed structures. In addition to the water lines that would supply domestic water, the Proposed Project includes a system of additional fire hydrants and 6-inch diameter fire water lines that would connect to each of the proposed structures and provide adequate fire flow to serve the Proposed Project. The combination of the adjacent existing water lines and the proposed water lines would provide adequate service to the Proposed Project. No additional water lines or upgrades of existing water lines are required. Therefore, the Proposed Project would result in no impacts on water infrastructure expansion beyond the improvements that are part of the Proposed Project.

Wastewater Facilities

Development of the Proposed Project will result in an increase in the generation of wastewater from the Project site. Based on an assumption that approximately 90 percent of the water used on the Project site would result in wastewater, the Proposed Project would result in the generation of approximately 0.074 mgd (83.16 AFY). The generation of 0.074 mgd to the JWPCP facility would represent a minimal increase in wastewater and the existing available capacity of 149 mgd would be adequate to accommodate the wastewater generated by the Proposed Project.

The Proposed Project includes 6-inch diameter sewer lines that would connect each of the proposed structures to either the existing sewer lines along E. 117th Place (8-inch diameter) or E. 118th Street (8-inch diameter). The storage/office use within the proposed parking structure would be the only use connecting to the existing sewer line along E. 117th Street (8-inch diameter). The proposed wastewater facilities are not proposed to tie directly into the 30-inch diameter sewer trunk line along E. 118th Street or the 27-inch diameter sewer trunk line along Compton Avenue. The combination of the adjacent existing sewer lines and the proposed sewer lines would provide adequate service to the Proposed Project. Based on the Sewer Study prepared for the Proposed Project and provided in Appendix K of this Addendum to Final PEIR, no additional sewer lines or upgrades of existing

sewer lines are required. Therefore, the Proposed Project would result in no impacts on wastewater infrastructure expansion beyond the improvements that are part of the Proposed Project.

Stormwater Drainage Facilities

The Proposed Project includes a system of drainage pipes, storage tanks (detention pipes), and drywells that have been designed to comply with the County LID Ordinance requirements for percolation and on-site detention. The facilities would retain stormwater on the site so that storm flows associated with a 25-year storm event would exit the Project site at the same rate as the existing storm flow from a 25-year storm event. Therefore, implementation of the Proposed Project would not increase stormwater flow downstream of the Project site and would not exceed the capacity of existing storm drain facilities that would result in flooding on- or off-site. As a result, the implementation of the Proposed Project would result in less than impacts associated with downstream drainage capacities.

Electric Power, Natural Gas, or Telecommunications Facilities

The Proposed Project includes a system of electricity, natural gas and telecommunication systems. The land uses that are part of the Proposed Project would represent infill development and they would not result in extraordinary energy consumption and substantial telecommunication facilities. The Proposed Project includes electricity, natural gas and telecommunication facilities on the Project site to serve each of the proposed uses. These onsite facilities would connect with existing facilities that are adjacent to the Project site. No new or expanded facilities would be required beyond the facilities that are part of the Proposed Project. Therefore, potential impacts on existing electricity, natural gas and telecommunication facilities would not occur.

Cumulative

Cumulative development within the water service areas would include infill and redevelopment projects. These cumulative projects could result in the need for new or upgraded water infrastructure. The construction activities associated with new or upgraded water facilities could result in significant environmental impacts. Because the Proposed Project would result in no impacts on water infrastructure expansion beyond the improvements that are part of the Proposed Project, the Proposed Project would not contribute to cumulative impacts on water infrastructure.

Cumulative wastewater infrastructure impacts are considered on a system-wide basis and are associated with the capacity of existing and planned infrastructure. As cumulative development occurs, downstream trunk sewers to the JWPCP could require upgrades or expansions. These improvements could result in significant environmental impacts associated with air quality and greenhouse gas emissions, noise and traffic safety during construction activities. Because the Proposed Project would not require additional sewer lines or upgrades of existing sewer lines, the Proposed Project would not contribute to cumulative impacts on wastewater infrastructure expansion beyond the improvements that are part of the Proposed Project.

Although the majority of cumulative developments would occur within an urban area, these cumulative developments could increase the amount of impervious surfaces and stormwater runoff. However, because each development would be required to comply with the LID

Ordinance requirements for percolation and on-site detention, there would be no need for downstream drainage facility improvements. Therefore, cumulative development would result in less than significant cumulative impacts on the capacities of existing or planned storm drains. Because the Proposed Project would not increase stormwater flow downstream of the Project site and would not exceed the capacity of existing storm drain facilities, the Proposed Project's contribution to cumulative impacts would be less than cumulatively considerable.

Cumulative development would increase the need for electricity and natural gas. However, it is anticipated that this incremental increase would be reduced with the implementation of existing energy conservation regulations. Cumulative energy utility system capacity problems would not result since cumulative development in the vicinity of the Proposed site is located within an urbanized area with existing facilities. The construction of new or expanded energy facilities for cumulative development is not expected to be required from the related infill development within the urban and developed region. Therefore, impacts from cumulative projects associated with energy facilities would be less than significant. Similarly, new or expanded telecommunication facilities for cumulative development are not expected to be required because cumulative development is located within an urbanized area where telecommunication facilities exist. Because the Proposed Project would not result in impacts to electricity, natural gas, or telecommunication facilities, the Proposed Project would not contribute to potential cumulative impacts to these facilities.

Applicable Mitigation Measures for the Proposed Project

Unlike the Specific Plan Program, no mitigation measures are required for the Proposed Project. The Specific Plan Program required the implementation of Mitigation Measure USS-1 which is the preparation of a sewer study to confirm that the existing trunk sewers have adequate capacity and if the capacity is exceeded then an upgrade would be required. Because a Sewer Study was conducted for the Proposed Project and the Sewer Study confirmed that the existing trunk sewer has adequate capacity to serve the Proposed Project, Mitigation Measure USS-1 is removed for the Proposed Project.

> **Mitigation Measure USS-1 (Removed):** ~~Prior to the issuance of a building permit, the individual project applicants shall submit a sewer study that confirms that the existing trunk sewers have adequate capacity to accommodate the projected wastewater flow from the proposed individual project as well as cumulative projects. If the projected wastewater flow exceeds the existing sewer capacity, the sewer trunk(s) shall be upgraded to accommodate the projected wastewater. Construction activities shall use best management practices to reduce (1) noise levels and limit construction in accordance with the County Code, (2) air quality and greenhouse gas emissions in accordance with the thresholds identified by the South Coast Air Quality Management District (see Section 3.2, Air Quality and Section 3.5, Greenhouse Gas Emissions in this EIR) and (3) traffic safety issues through the implementation of a traffic control plan that includes features such as signage, land closures, flaggers, detours and notifications to surrounding property owners.~~

Conclusion

As with the Specific Plan Program, the implementation of the Proposed Project would not result in environmental impacts associated with water, electricity, natural gas and telecommunication

facilities and would result in less than significant impacts related to drainage facilities. Unlike the Specific Plan Program, the Proposed Project would not result in impacts associated with sewer facilities. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Water Supplies

Impact 3.19-2: The Specific Plan Program and Proposed Project would result in less than significant and less than cumulatively considerable impacts related to sufficient water supplies available to serve the Specific Plan Program and the Proposed Project and reasonably foreseeable future development during normal, dry, and multiple dry years.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Final PEIR stated that the Specific Plan Program would increase the amount of development within the Program area and increase the demand for potable water. Liberty serves a portion of the Specific Plan Program area. The Final PEIR stated that the Specific Plan Program projections for housing and population exceeded the SCAG's growth projections, and therefore, Liberty's growth projections were exceeded. The Final PEIR stated that these projections were exceeded by approximately 527 AFY. However, the Final PEIR also stated that Liberty's water supply projections showed a water supply of 910 AFY in excess of their growth projections based on SCAG's projected growth. Therefore, the Specific Plan Program water demand for the portion that is located within Liberty's service area could be accommodated. Therefore, less than significant impacts on Liberty's water supply entitlements for an average year was found to be less than significant.

Cumulative

Cumulative water supply impacts are considered on a purveyor service area basis and are associated with the adequacy of the primary sources of water that include groundwater, imported water. Cumulative development could result in significant impacts on water supply. However, because the Specific Plan Program's impact on the Liberty service area is less than significant, the Specific Plan Program's impact on Liberty's water supply would be less than cumulatively considerable.

Proposed Project Evaluation

Proposed Project-Specific

The Water Supply Assessment prepared for the Proposed Project evaluated the availability of water supply during normal, single-dry and multiple-dry years. The analysis reviewed the historical conditions that represented each of these scenarios. Liberty relies on a combination of imported water, local groundwater, and recycled water to meet its water needs. Liberty works

together with two primary agencies, Central Basin Municipal Water District (CBMWD) and the Water Replenishment District of Southern California (WRD) to ensure a safe and reliable water supply that will continue to serve the community in periods of drought and shortage. The sources of imported water supplies provided by Metropolitan Water District of Southern California (Metropolitan) via Liberty's Metropolitan member agency, CBMWD, include the Colorado River and the State Water Project.

Liberty's other main source of water supply is groundwater from the Central Basin managed by WRD. While usage between imported and groundwater supply varies from year to year, over the past dozen years Liberty has averaged an approximately equal percentage of groundwater (44%) and imported water (56%). However, going forward Liberty is projecting to gradually reduce dependence on imported water and use a higher percentage of local groundwater with the mix estimated at just over 60% groundwater by 2045.

The WSA evaluated Libert's reliability to supply water to its service area. Reliability is a measure of a water system's ability to manage water shortages. Reliability planning requires information about the following: (1) expected frequency and severity of shortages; (2) how additional water management measures are likely to affect the frequency and severity of shortages; and (3) how available contingency measures can reduce the impact of shortages when they occur. The reliability of Liberty's water supply is currently dependent on the reliability of both groundwater and imported water supplies, which are managed and delivered by WRD and CBMWD/Metropolitan, respectively. Despite the ongoing water supply challenges within the region, the goal and statutory mission of these agencies are to identify and develop projects to meet the water demands in the region.

The WSA also evaluated Metropolitan Water District's reliability to supply water. Metropolitan acquires water from Northern California via the State Water Project and from the Colorado River to supply water to most of Southern California. In addition, the Water Replenishment District (WRD) Supply reliability was reviewed because part of Liberties water supply is obtained through groundwater managed by the Central Basin and West Coast Basin.

In addition to the regional agencies' reliability to supply water, Liberty implements water shortage contingency and water conservation plans. Based on Liberty's ability to reduce water demand during historical drought scenarios as well as the additional regional reliability projects that are being implemented in the future as discussed in the Liberty 2020 Urban Water Management Plan, the conclusion of the evaluation was that Liberty can reliably meet the future normal, single-dry, and multiple-dry year demands of future development projects within their service area, including the Proposed Project, now and for the next twenty years.

Cumulative

As future cumulative development occurs that is consistent with the growth projections identified by SCAG, sufficient water supplies are projected to be available. Therefore, the development of cumulative projects would result in less than significant impacts on water supply. Because the Proposed Project would result in less than significant impacts on water supply, the Proposed Project's contribution to cumulative impacts would be less than cumulatively considerable.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project would result in less than significant impacts on water supply. Therefore, the Proposed Project would not result in any new significant impacts or substantially more severe environmental impacts than were identified for the Specific Plan Program in the Final PEIR. Further, there is no new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Wastewater Treatment

Impact 3.19-3: The Specific Plan Program and Proposed Project would result in less than significant and less than cumulatively considerable impacts on adequate wastewater treatment capacity to serve the Specific Plan Program's and the Proposed Project's projected demand in addition to the wastewater treatment provider's existing commitments.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Final PEIR identified that the Specific Plan Program is projected to generate approximately 1.4 million gallons per day (mgd). The JWPCP has a 400 mgd treatment capacity and the average daily discharge after treatment is 251 mgd (California LARWQCB, 2023). Therefore, the JWPCP has excess treatment capacity of approximately 149 mgd and would have sufficient capacity to process the additional average wastewater flow of approximately 1.4 mgd that would be generated by the Specific Plan Program at buildout. Therefore, the proposed Specific Plan Program would not increase wastewater generation such that the existing capacity at JWPCP would be exceeded. Therefore, the implementation of the Specific Plan Program would result in a less than significant impact on existing wastewater treatment capacity at JWPCP.

Cumulative

Cumulative development would increase wastewater flows to the JWPCP. Currently, the JWPCP has an excess treatment capacity of approximately 149 mgd. Based on the existing excess capacity, the implementation of cumulative development would reduce the excess daily capacity; however, the reduction is anticipated to be less than significant. Because the Specific Plan Program would result in a less than significant impact on existing wastewater treatment capacity at JWPCP, the Specific Plan Program's contribution to cumulative impacts would be less than cumulatively considerable.

Proposed Project Evaluation

Proposed Project-Specific

Development of the Proposed Project will result in an increase in the generation of wastewater from the Project site. Based on an assumption that approximately 90 percent of the water used on the Project site would result in wastewater, the Proposed Project would result in the generation of

approximately 0.074 mgd (83.16 AFY). The generation of 0.074 mgd to the JWPCP facility would represent a minimal increase in wastewater and the existing available capacity of 149 mgd would be adequate to accommodate the wastewater generated by the Proposed Project. Therefore, the Proposed Project would result in a less than significant impact on the existing available wastewater treatment capacity at JWPCP.

Cumulative

Cumulative development would increase wastewater flows to the JWPCP. Currently, the JWPCP has an excess treatment capacity of approximately 149 mgd. Based on the existing excess capacity, the implementation of cumulative development would reduce the excess daily capacity; however, the reduction is anticipated to be less than significant. Because the Proposed Project would result in a less than significant impact on existing wastewater treatment capacity at JWPCP, the Proposed Project's contribution to cumulative impacts would be less than cumulatively considerable.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project would result in less than significant impacts on the existing available wastewater treatment capacity at JWPCP. Therefore, the Proposed Project would not result in any new significant impacts or substantially more severe environmental impacts than were identified for the Specific Plan Program in the Final PEIR. Further, there is no new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Solid Waste

Impact 3.19-4: The Specific Plan Program and Proposed Project would result in less than significant and less than cumulatively considerable impacts related to generating solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impairing the attainment of solid waste reduction goals.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

Based on the projected residential population and the non-residential square feet of development under the Specific Plan Program, the Final PEIR identified that approximately 35,622 tons of demolition and construction waste (i.e., an average of approximately 11 tons per day) during buildout of the Specific Plan Program and approximately 5 tons of waste per day during the operation of individual developments under the Specific Plan Program. Based on remaining daily capacities at landfills within Los Angeles County (i.e., Sunshine Canyon Landfill, Antelope Valley Landfill, and Lancaster Landfill), there would be adequate capacity to dispose the solid waste generated by the Specific Plan Program. The Final PEIR identified that the increase in solid waste from operation of the Specific Plan Program at buildout would not require construction of a

new landfill or expansion of the existing landfill to meet capacity needs. As a result, operational impacts related to the capacity of landfill facilities would be less than significant.

Cumulative

The geographic scope of cumulative analysis for landfill capacity is the service area for the Sunshine Canyon Landfill, Antelope Valley Landfill and Lancaster Landfill which serve the Specific Plan Program area. The projections of future landfill capacities are based on the projected waste stream going to these landfills. As described above, these landfills are projected to remain open until at least 2037. The lifespan of these landfills includes the existing and projected solid waste that is anticipated from the growth in the County. As a result, impacts from future growth on landfill capacity would be less than cumulatively significant. Although the Proposed Project would contribute solid waste to the landfills, the addition of up to 11 tons of demolition and construction solid waste per day and up to 5 tons of operational solid waste per day would not substantially impact the permitted capacity of the landfills. Therefore, the increase in solid waste from operation of the Specific Plan Program in combination with planned growth within the County would not require construction of a new landfill or expansion of the existing landfill to meet capacity needs. As a result, the Specific Plan Program's contribution to cumulative impacts on the capacities of the landfill facilities would be less than cumulatively considerable.

Proposed Project Evaluation

Proposed Project-Specific

Development of the Proposed Project would result in less dwelling units and less non-residential square feet than allocated under the Specific Plan Program. Therefore, the Proposed Project would result in the generation of less solid waste than projected for the Project site under the Specific Plan Program. Because the implementation of the Specific Plan Program would result in a less than significant impact related to capacity of land fill facilities, the implementation of the Proposed Project would also result in less than significant impacts.

Cumulative

The geographic scope of cumulative analysis for landfill capacity is the service area for the Sunshine Canyon Landfill, Antelope Valley Landfill and Lancaster Landfill which serve the Specific Plan Program area. The projections of future landfill capacities are based on the projected waste stream going to these landfills. The lifespan of these landfills are until at least 2037 and includes the existing and projected solid waste that is anticipated from the growth in the County. As a result, impacts from future growth on landfill capacity would be less than cumulatively significant. Because the implementation of the Proposed Project would result in a less than significant impact related to capacity of landfill facilities, the Proposed Project's contribution to cumulative impacts would be less than cumulatively considerable.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Revised Project.

Conclusion

As with the Specific Plan Program, the Proposed Project would result in a less than significant impact related to capacity of landfill facilities. Therefore, the Proposed Project would not result in any new significant impacts or substantially more severe environmental impacts than were identified for the Specific Plan Program in the Final PEIR. Further, there is no new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Solid Waste Regulations

Impact 3.19-5: The Specific Plan Program and Proposed Project would result in no impacts and would not contribute to cumulative impacts related to compliance with federal, state, and local management and reduction statutes and regulations related to solid waste.

Summary of Final PEIR Evaluation

Approved Specific Plan Program

The Final PEIR identified that the Specific Plan Program would result in new development, infill and redevelopment of land uses that would generate solid waste. All solid waste-generating activities within the County of Los Angeles are subject to the requirements set forth in AB 939 that requires diversion of a minimum of 50 percent of construction and demolition debris. In addition, after 2020 development projects pursuant to the Specific Plan Program would be required to divert 75 percent of solid waste. Disposal of waste generated from implementation of the Specific Plan Program would be consistent with all state regulations and the policies within the Los Angeles County Integrated Waste Management Plan. Future development under the Specific Plan Program would comply with all solid waste statutes and regulations. Therefore, impacts associated with conflict with federal, state, or local statutes or regulations related to solid waste would not occur from implementation of the Specific Plan Program, and there would be no impacts.

Cumulative

The geographic scope of cumulative analysis for compliance related to solid waste regulations is the service area for the landfills that serve the Los Angeles County region. Disposal of solid waste generated by cumulative development would be subject to the requirements set forth in AB 939, AB 341, and the policies within the Los Angeles County Integrated Waste Management Plan. Therefore, cumulative development would comply with all solid waste statutes and regulations, and cumulative development would result in no impacts.

Because disposal of solid waste generated by the Specific Plan Program would comply with all solid waste statutes and regulations, the Specific Plan Program would not contribute impacts related to conflicts with solid waste regulations. Therefore, the Specific Plan Program would not contribute to cumulative impacts associated with compliance with solid waste statutes and regulations.

Proposed Project Evaluation

Proposed Project-Specific

Similar to the Specific Plan Program, development in accordance with the Proposed Project would be subject to the requirements set forth in AB 939 that requires diversion of construction and demolition debris. In addition, development in accordance with the Proposed Project would be required to divert 75 percent of solid waste. Disposal of waste generated from implementation of the Proposed Project would be consistent with all state regulations and the policies within the Los Angeles County Integrated Waste Management Plan. Development in accordance with the Proposed Project would comply with all solid waste statutes and regulations. Therefore, impacts associated with conflict with federal, state, or local statutes or regulations related to solid waste would not occur from implementation of the Proposed Project, and there would be no impacts.

Cumulative

The geographic scope of cumulative analysis for compliance related to solid waste regulations is the service area for the landfills that serve the Los Angeles County region. Disposal of solid waste generated by cumulative development would be subject to the requirements set forth in AB 939, AB 341, and the policies within the Los Angeles County Integrated Waste Management Plan. Therefore, cumulative development would comply with all solid waste statutes and regulations, and cumulative development would result in no impacts.

Because disposal of solid waste generated by the Proposed Project would comply with all solid waste statutes and regulations, the Proposed Project would not contribute impacts related to conflicts with solid waste regulations. Therefore, the Proposed Project would not contribute to cumulative impacts associated with compliance with solid waste statutes and regulations.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the Proposed Project impacts would not result in impacts associated with a conflict with federal, state, or local statutes or regulations related to solid waste. Therefore, the Proposed Project would not result in any new significant impacts or substantially more severe environmental impacts than were identified for the Specific Plan Program in the Final PEIR. Further, there is no new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

3.19.6 References

County of Los Angeles. 2015. Los Angeles County General Plan, Public Services and Facilities Element. Available at: https://case.planning.lacounty.gov/assets/upl/project/gp_final-general-plan-ch13.pdf. Accessed on August 28, 2024.

Los Angeles County Sanitation Districts. 2024. A.K. Warren Water Resource Facility. Available at: https://www.lacsd.org/services/wastewater-sewage/facilities/ak-warren-water-resource-facility. Accessed on August 27, 2024.

Psomas. 2024. CDU/MLK Wellness Campus Water Supply Assessment. August. See Appendix J of this Addendum to Final PEIR.

Stetson Engineers, Inc. 2021. Liberty Utilities – Park 2020 Urban Water Management Plan. Available at: https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M520/K752/520752639.PDF. Accessed on August 27, 2024.

3.20 Wildfire

3.20.1 Introduction

This section addresses wildfires and the Proposed Project's potential impacts with respect to wildfires. The Final PEIR did not include a section dedicated to the issue of wildfires because this issue was first included as a category in the CEQA Guidelines Appendix G thresholds and the County of Los Angeles CEQA thresholds subsequent to the certification of the Final PEIR. However, the issues of fire exposure and fire hazard were addressed in the Final PEIR.

This section includes a summary of the environmental setting and the identification of any applicable changes to the environmental setting that may have occurred since the certification of the Final PEIR. Although the Final PEIR did not provide a summary of the regulatory setting, the relevant regulatory setting is provided below. This section also sets forth the thresholds of significance, reviews the Final PEIR's discussion of issues related to the Specific Plan Program and fire hazard and includes an evaluation of the wildfire impacts associated with the Proposed Project. Finally, this section provides a conclusion of whether (1) the Proposed Project includes substantial changes that would require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact related to wildfire; (2) substantial changes in the circumstances under which the Proposed Project is undertaken would require major revisions to the Final PEIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact related to wildfire; or (3) new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3) exist related to wildfire.

3.20.2 Environmental Setting

The Specific Plan Program area including the Proposed Project are located within an urban area that is not near open land. Based on a review of the Los Angeles County Fire Department fire hazard severity zones within a Local Responsibility Area, the Specific Plan Program and the Project site are not located within a designated fire hazard severity zone. The nearest very high fire hazard severity zone to the Project site is located approximately eight miles northwest of the Project site (Los Angeles County Fire Department, 2024). Based on a review of the State of California and the Department of Forestry and Fire Protection (CAL FIRE) fire hazard severity zones, the Specific Plan Program and Project site are not located near a fire severity zone designated as moderate, high, or very high within a State Responsibility Area (California Department of Forestry & Fire Protection, 2023). The nearest fire hazard severity zone within a State Responsibility Area is also approximately eight miles northwest of the Project site.

3.20.3 Regulatory Setting

California Department of Forestry and Fire Protection

CalFire is the California Department of Forestry and Fire Protection. It is dedicated to the fire protection and stewardship of over 31 million acres of the state's wildlands. Sections 51175 –

51189 of the California Government Code define CalFire's responsibility for identifying FHSZ throughout California. The FHSZs on CalFire maps are based on fuel loading, slope, fire history, weather, and other factors as directed by California Public Resources Code, Sections 4201 – 4204, and California Government Code, Sections 51175 – 51189. FHSZs are ranked from Moderate to Very High and are designated within a Federal Responsibility Area, State Responsibility Area (SRA), or LRA, which indicate the jurisdiction as belonging to a federal agency, CalFire, or local agency, respectively. The agency that performs firefighting activities can be different from the responsible agency if there is a contract agreement in place. Local agencies have the responsibility to designate, by ordinance, VHFHSZ within their jurisdictions, per sections 51178.5 and 51179 of the Government Code. The Project site is located within a VHFHSZ within an LRA.

California Building Code

The CBC contains three chapters that address fire safety.

Chapter 7, Fire and Smoke Protection Features

Chapter 7 regulates materials, systems and assemblies used for structural fire resistance and fire-resistance-rated construction separation of adjacent spaces to safeguard against the spread of fire and smoke within a building and the spread of fire to or from buildings. Chapter 7 applies to all permitted structures.

Chapter 7A, Materials and Construction Methods for Exterior Wildfire Exposure

Chapter 7A establishes minimum standards for the protection of life and property by increasing the ability of a building located in any Fire Hazard Severity Zone (FHSZ) to resist the intrusion of flames or burning embers projected by a vegetation fire and contributes to a systematic reduction in conflagration losses. Chapter 7A applies to all new buildings located within a FHSZ and wherever local regulation may require. The Approved Project and Revised Project are subject to Chapter 7A requirements and project structures will, therefore, meet all ignition-resistant construction standards of the chapter.

Chapter 9, Fire Protection Systems

Chapter 9 is known as the California Fire Code (CFC), which incorporates by adoption the International Fire Code with California amendments. The CFC specifies when fire protection systems are required, and specifies the design, installation, and operation of those systems. It addresses requirements for buildings, facilities, storage, and processes, and addresses safe storage, and use of hazardous materials, as well. Fire sprinkler requirements, fire flow standards, and emergency access roads standards are components of the CFC. Chapter 9 requirements are applicable throughout the state.

Local

County of Los Angeles Code

Title 32 of the Los Angeles County Code includes the regulations associated with the Fire Code within the County. These regulations include fire safety plans, evacuation plans, fire facilities

required for developments, Section 4908.1 of the Los Angeles County Code of Ordinances requires a fuel modification plan to be submitted by projects that are located within fire hazard severity zones within State Responsible Areas or VHFHSZ within the Local Responsible Areas.

3.20.4 Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines and the County of Los Angeles Environmental Checklist Form, the project could have a significant related to wildfires

- If located in or near state responsibility areas or lands classified as very high hazard severity zones, and
  - Substantially impair an adopted emergency response plan or emergency evacuation plan,
  - Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire,
  - Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment, or
  - Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes (see Impact 3.20-1, below)

3.20.5 Impact Analysis

Wildfires

Impact 3.20-1: The Specific Plan Program and Proposed Project are not located in or near state responsibility areas or lands classified as very high hazard severity zones, and therefore, would not result in environmental effects associated with wildfires such as:

- **Substantially impair an adopted emergency response plan or emergency evacuation plan;**
- **Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire;**
- **Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or**
- **Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.**

Summary of Final PEIR Evaluation

Approved Specific Plan Program

As discussed in the Initial Study/Notice of Preparation and the Final PEIR, the Specific Plan Program area is located within a highly urban area and is not located in an area classified as a Very High Fire Hazard Severity Zone (VHFHSZ) in a Local Responsibility Area (LRA) or within a fire hazard severity zone in a State Responsibility Area classified by CalFire (CAL FIRE, 2023). The nearest designated fire hazard severity zone is approximately eight miles northwest of the Project site. Due to the distance from a designated fire hazard severity zone, the Specific Plan Program area would not result in impacts related to wildfires.

Cumulative

The Final PEIR did not address the cumulative impacts of wildfires since the Specific Plan Program area is not located in the vicinity of a designated fire hazard severity zone. Therefore, the implementation of the Specific Plan Program would not contribute to cumulative impacts related to wildfires.

Proposed Project Evaluation

Proposed Project-Specific

As with the Specific Plan Program, the Proposed Project is located within an urban area and is not located in an area designated as a fire hazard severity zone. Because the Project site is located approximately eight miles from the nearest designated fire hazard severity zone, the Proposed Project would not result in impacts related to wildfires.

Cumulative

As with the Specific Plan Program, the Proposed Project is not located within a fire hazard severity zone. Therefore, the Proposed Project would not contribute to cumulative impacts related to wildfires.

Applicable Mitigation Measures for the Proposed Project

As with the Specific Plan Program, no mitigation measures are required for the Proposed Project.

Conclusion

As with the Specific Plan Program, the implementation of the Proposed Project would not result in impacts associated with wildfires. Therefore, the Proposed Project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Specific Plan Program due to the involvement of a new significant impact or a substantial increase in severity of an impact. Further, there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final PEIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

3.20.6 References

California Department of Forestry and Fire Protection (CAL FIRE). 2023.Fire Hazard Severity Zones in State Responsibility Area. Available at: https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones. Accessed on August 25, 2024.

Los Angeles County Fire Department. 2024. Fire Hazard Severity Zones, LRA. Available at. https://data.lacounty.gov/datasets/bf87f4b1e6954f4697006ff41420c083/explore. Accessed on August 15, 2024.

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Exhibit F

Mitigation Monitoring and Reporting Program CDU Wellness and Education Campus

CEQA Requirements

Section 15097 of the CEQA Guidelines requires a public agency to adopt a program for monitoring or reporting on the changes it has required in the project or conditions of approval to substantially lessen significant environmental effects. This Mitigation, Monitoring and Reporting Program (MMRP) summarizes the mitigation commitments identified in the CDU Wellness and Education Campus Addendum to the Willowbrook Transit Oriented District Specific Plan Final Program EIR (State Clearinghouse No. 2015101106). Mitigation measures are presented in the same order as they occur in the Addendum.

The columns in Table 1 below provide the following information:

- **Mitigation Measure(s):** The action(s) that will be taken to reduce the impact to a less-than-significant level.
- **Action Required:** The appropriate steps to implement and document compliance with the mitigation measures.
- **Mitigation Timing:** The general schedule for conducting each task.
- **Responsible Party:** The agency or private entity responsible for ensuring implementation of the mitigation measure. However, until the mitigation measures are completed, the County of Los Angeles, as the CEQA Lead Agency, remains responsible for ensuring that implementation of the mitigation measures occur in accordance with the MMRP (CEQA Guidelines, Section 15097(a)).
- **Monitoring Agency or Party:** The agency or private entity responsible for reviewing and/or overseeing implementation of the mitigation measure.

Exhibit F

TABLE 1
MITIGATION MONITORING AND REPORTING PROGRAM FOR THE CDU WELLNESS AND EDUCATION CAMPUS

Mitigation Measures	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
Air Quality				
AIR-2: The County shall ensure that project approvals within the Specific Plan area require that all active construction areas shall be watered at least four times daily to reduce fugitive dust emissions from grading, excavation, and other ground preparation. Watering shall be sufficient to prevent airborne dust from leaving the site. Increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. Reclaimed water shall be used whenever possible.	Maintain log demonstrating compliance	Prior to commencement of construction and during construction	Applicant, Construction Manager	LACDRP
AIR-3: Reduction or elimination of fireplaces within residential development such that there are no fireplaces within 95 percent of all new/redeveloped single family residential development or 100 percent of all multifamily residential development (new and redeveloped) within the Specific Plan area. Compliance would be ensured through County review prior to the issuance of a building permit.	Submit site plan review application	Prior to building permit	Applicant	LACDRP/LACFD
AIR-4: All commercial development will use low-VOC architectural coating such that interior coatings do not exceed 10 grams per liter (g/l) of VOC content and exterior coatings do not exceed 100 g/l. This measure is to be made a condition of approval for continued upkeep of the property.	Submit site plan review application	Prior to building permit	Applicant	LACDRP
	Maintain log demonstrating compliance	During and after construction	Applicant, Construction Manager	LACDRP
AIR-5: All commercial developments will use low-VOC cleaning supplies. This measure is to be made a condition of approval for continued upkeep of the property.	Submit site plan review application	Prior to building permit	Applicant	LACDRP
	Maintain log demonstrating compliance	During and after construction	Applicant, Construction Manager	LACDRP
AIR-6: All new development shall comply with the Title 24 requirements in effect at the time of construction and shall, at a minimum, exceed 2013 Title 24 energy efficiency standards by 15 percent.	Maintain log demonstrating compliance	During Construction	Applicant, Construction Manager	LACDRP
Cultural Resources				
CUL-5: Avoidance, preservation or data recovery shall occur for archaeological resources that could be affected by ground disturbing activities and are found to be significant resources. To ensure that developments in accordance with the Specific Plan do not result in significant impacts to pre-historic or historic archaeological resources, the following shall be implemented. The Applicant shall retain an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for Archaeology (Qualified Archaeologist) to carry out all mitigation related to archaeological resources. Prior to start of ground-disturbing activities, the Qualified Archaeologist or their designee shall conduct cultural resources sensitivity training for all construction personnel. Construction personnel shall be informed of the types of archaeological resources that may be encountered, the proper procedures to be	Prepare a Phase I cultural resources inventory	Before construction	Applicant	LACDRP

Mitigation Measures	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
enacted in the event of an inadvertent discovery of archaeological resources or human remains, and safety precautions to be taken when working with archaeological monitors. The County shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance. Archaeological monitoring shall be conducted during ground disturbing activities, such as clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the Project. Monitoring shall be conducted by an archaeologist who is familiar with the types of archaeological resources that could be encountered and who will work under the direct supervision of the Qualified Archaeologist. Monitoring can be reduced to part-time inspections or ceased entirely if determined appropriate by the Qualified Archaeologist, based on field observations.	Submit California Department of Parks and Recreation Site Forms, and data recovery and associated documentation, as applicable	Before construction	Applicant	LACDRP
During project-level construction, should prehistoric or historic subsurface cultural resources be discovered, the archaeological monitor shall be empowered to halt or redirect ground-disturbing activities away from the vicinity of the discovery (within approximately 100 feet) until it has been evaluated. The archaeological monitor shall keep daily logs detailing the types of activities and soils observed, and any discoveries. The Qualified Archaeologist shall assess the significance of the find according to CEQA Guidelines Section 15064.5. If any find is determined to be significant, the archaeologist shall determine, in consultation with the County, and local Native American groups expressing interest, appropriate avoidance measures or other appropriate mitigation. Per CEQA Guidelines Section 15126.4(b)(3), project redesign and preservation in place shall be the preferred means to avoid impacts to significant cultural resources. Methods of avoidance may include, but shall not be limited to, project re-route or re-design, project cancellation, or identification of protection measures such as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the Qualified Archaeologist shall develop additional treatment measures within an Archaeological Resources Treatment Plan in consultation with the County and local Native American groups expressing interest, which may include data recovery or other appropriate measures. All significant cultural materials recovered will be, as necessary and at the discretion of the consulting archaeologist and in consultation with local Native American groups expressing interest, subject to scientific analysis, professional museum curation, and documentation according to current professional standards. The treatment plan shall include provisions for the final disposition of the recovered resources, which may include onsite reburial, curation at a public, non-profit institution, or donation to a local Native American Tribe, school, or historical society. At the conclusion of archaeological monitoring and prior to the release of the grading bond, the Qualified Archaeologist shall prepare a final monitoring report. The report shall include a summary of monitoring results, description of resources unearthed, if any, significance evaluation and treatment of the resources, and the results of the artifact processing, analysis, and research. Appropriate California Department of Parks and Recreation 523 Forms shall be appended to the report, as necessary. The report shall be submitted by the Applicant to the County to signify the satisfactory completion of the Project and required mitigation measures. The Qualified Archaeologist shall submit the final report to the South Central Coastal Information Center within 30 days of its acceptance by the County.	Submit final report, as applicable	Prior to issuance of certificate of occupancy	Applicant/ Qualified Archaeologist	LACDRP, California Office of Historic Preservation for support/referral, CHRIS-SCCIC

Exhibit F

Mitigation Measures	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
CUL-6: The project applicant shall retain a qualified paleontologist (in accordance with the Society of Vertebrate Paleontologists) to monitor all ground-disturbing activities in native soils or sediments beginning at five feet below ground surface and deeper. If the paleontologist, upon observing initial earthwork, determines there is low potential for discovery, no further action shall be required and the paleontologist shall submit a memo to the County confirming findings of low potential. If the qualified paleontologist, upon observing initial earthwork, determines there is a moderate to high potential for discovery, a qualified paleontologist or paleontological monitor (retained by the County) shall monitor all mass grading and excavation activities. Monitoring will be conducted in areas of grading or excavation in undisturbed formation sediments, as well as where over-excavation of surficial alluvial sediments will encounter these formations in the subsurface. Paleontological monitors shall be equipped to salvage fossils as they are unearthed to avoid construction delays and to remove samples of sediment that are likely to contain the remains of small fossil invertebrates and vertebrates. The monitor must be empowered to temporarily halt or divert equipment to allow removal of abundant or large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface, or if present, are determined on exposure and examination by qualified paleontological personnel to have low potential to contain fossil resources. Should any paleontological resources (i.e., fossils) be uncovered during project construction activities, all work within a 100-foot radius of the discovery site shall be halted or diverted to other areas on the site and the County shall be immediately notified. The qualified paleontologist shall evaluate the finds and recommend appropriate next steps to ensure that the resource is not substantially adversely impacted, including but not limited to avoidance, preservation in place, excavation, documentation, curation, data recovery, or other appropriate measures. Further, ground disturbance shall not resume within a 100-foot radius of the discovery site until an agreement has been reached between the project applicant, the qualified paleontologist, and the County as to the appropriate preservation or mitigation measures to ensure that the resource is not substantially adversely impacted. Any recovered paleontological specimens shall be identified to the lowest taxonomic level possible and prepared for permanent preservation. Screen-washing of sediments to recover small invertebrates and vertebrates shall occur if necessary. Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage shall occur at an institutional repository approved by the County. The paleontological program shall include a written repository agreement prior to the initiation of mitigation activities. A final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered and necessary maps and graphics to accurately record their original location. The report, when submitted to an accepted by the County, shall signify satisfactory completion of the project program to mitigation impacts to any potential nonrenewable paleontological resources (i.e., fossils) that might have been lost or otherwise adversely affected without such a program in place.	Submit Monitoring Plan	Prior to construction	Applicant/ Qualified Paleontologist	LACDRP
	Submit data recovery and associated documentation, as applicable	Prior to issuance of certificate of occupancy	Applicant/ Qualified Paleontologist	LACDRP
	Submit final report, as applicable	Prior to issuance of certificate of occupancy	Applicant/ Qualified Paleontologist	LACDRP
CUL-7: If human remains are encountered, the Applicant shall halt work in the vicinity (within 100 feet) of the find and contact the Los Angeles County Coroner in accordance with PRC Section 5097.98 and Health and Safety Code Section 7050.5. If the County Coroner determines that the remains are of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC) in accordance with Health and Safety Code Section 7050.5, subdivision (c), and PRC Section 5097.98. The NAHC shall then	Submit documentation	Prior to issuance of certificate of occupancy	Applicant/ Qualified Archaeologist	LACDRP

Mitigation Measures	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
identify the person(s) thought to be the Most Likely Descendent (MLD). The MLD may, with the permission of the landowner, or his or her 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. Upon the discovery of the Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this mitigation measure, with the MLD regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the MLD on all reasonable options regarding their preferences for treatment.				
Noise and Vibration				
NOI-1: Prior to the issuance of building permits, exterior areas of proposed multiple family residential uses that are projected to be exposed to existing with Project roadway noise levels and cumulative with Project roadway noise levels exceeding the County's exterior noise standards (i.e., 65 dBA CNEL for multiple family residential) shall include noise attenuation features including, but not limited to, setbacks, soundwalls, glass noise barriers, and landscaping so that exterior areas meet the County's exterior noise standards. In addition, construction activities on the Project site will include construction techniques such as sound barriers and sound blankets where necessary to meet the County's Noise Ordinance. To ensure that the County's exterior noise standard for the proposed multi-family residential uses (65 dBA CNEL) are met, the Applicant shall demonstrate compliance through the preparation of an acoustical evaluation and if the Proposed Project's construction techniques identified in Section 2.4.7 of this Addendum are modified, the Applicant shall demonstrate compliance with the County's Noise Ordinance to the County Department of Public Health through the preparation of an acoustical evaluation.	Submit site plan review application	Prior to issuance of building permit	Applicant	LACDPH
NOI-3: Prior to approval of a grading permit or building permit, construction equipment shall be prohibited within 50 feet of occupied residential structures. If construction equipment is required to be within 50 feet of occupied residential structures, the project applicant shall demonstrate that the human annoyance threshold of 80 VdB (0.04 in/sec PPV) and structural damage thresholds of 0.2 in/sec PPV for non-engineered timber and masonry buildings and 0.12 in/sec PPV for historic-age buildings that are extremely susceptible to vibration damage is achieved. Demonstration of compliance shall be provided through the preparation of a vibration analysis.	If construction equipment is required to be within 50 feet of occupied residential structures, submit vibration analysis report for review and approval	Prior to issuance of grading or building permit	Applicant	LACDPH

Exhibit G

AERIAL IMAGERY

SITE-SPECIFIC MAP

PROJECT NO. PRJ2023-002770
CUP RPPL2023004092



Digital Ortho Aerial Imagery:
Los Angeles Region Imagery Acquisition Consortium (LARIAC)
2025

Feet
0 150 300

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LOS ANGELES COUNTY
Dept. of Regional Planning
320 W. Temple Street
Los Angeles, CA 90012

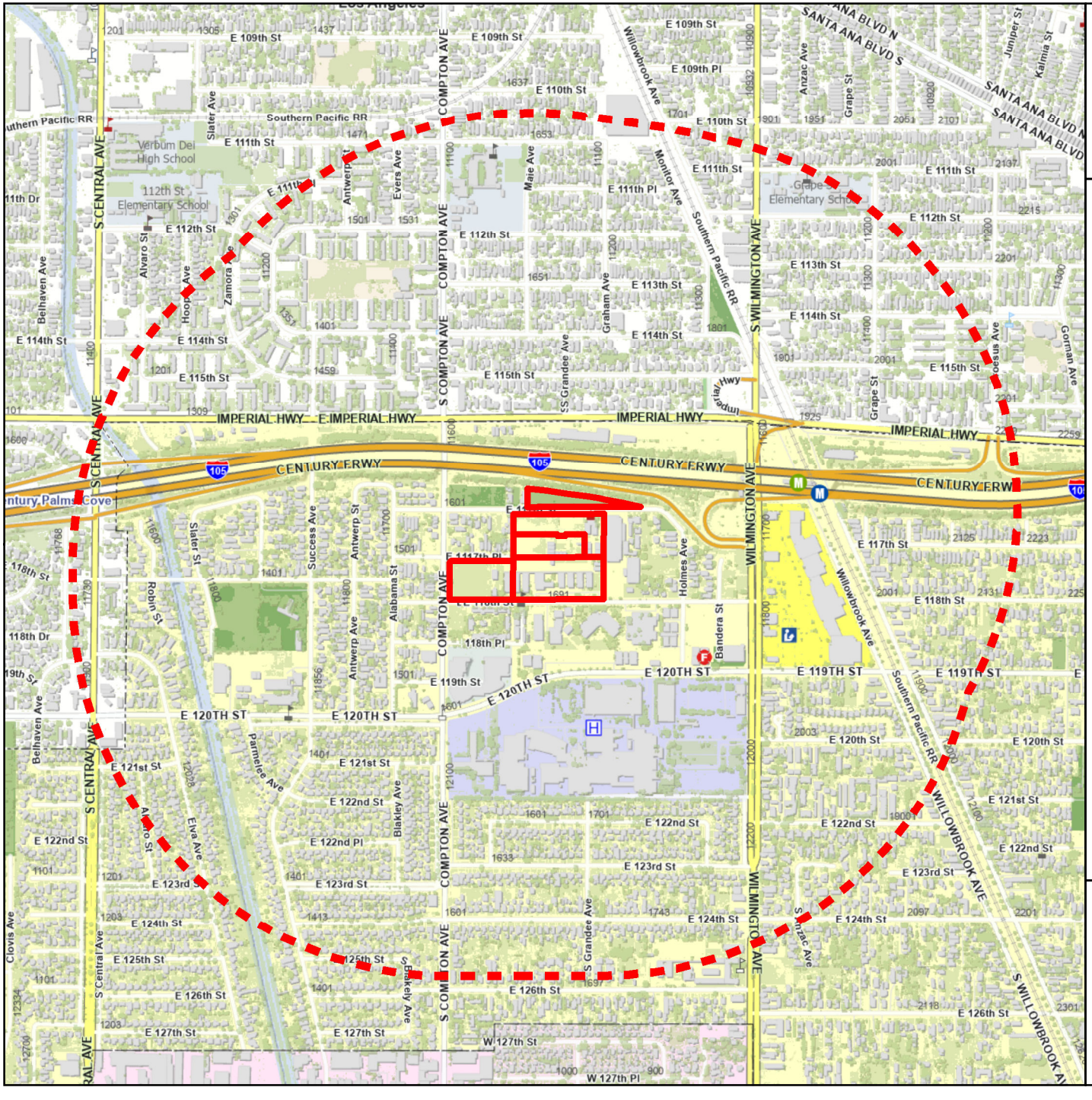
Exhibit G

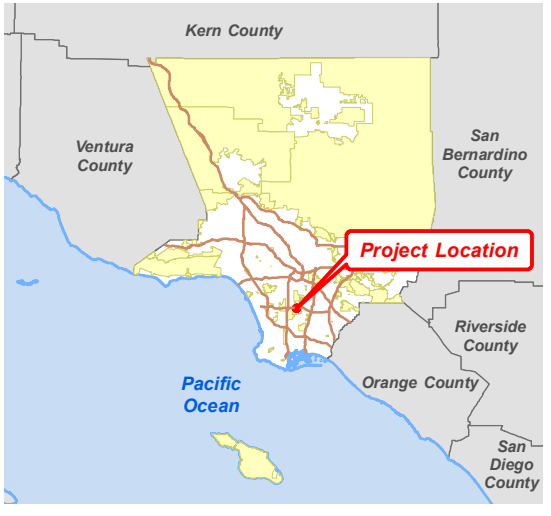
HALF-MILE RADIUS

LOCATOR MAP

PROJECT NO. PRJ2023-002770

CUP RPPL2023004092





Feet

0 600 1,200

N

LOS ANGELES COUNTY
Dept. of Regional Planning
320 W. Temple Street
Los Angeles, CA 90012

Exhibit G

3-MILE RADIUS

LOCATOR MAP

PROJECT NO. PRJ2023-002770

CUP RPPL2023004092



LOS ANGELES COUNTY
Dept. of Regional Planning
320 W. Temple Street
Los Angeles, CA 90012

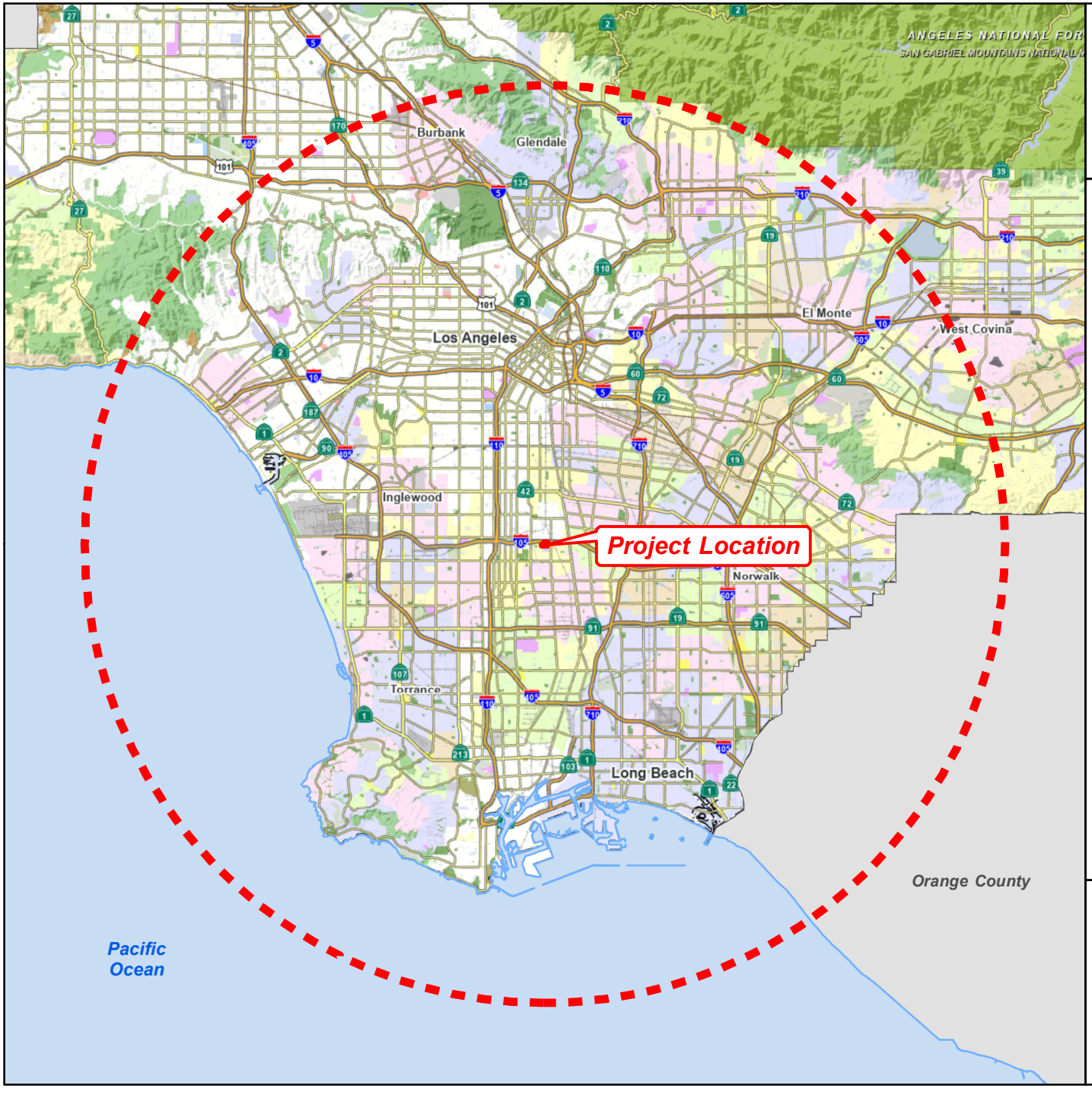
Exhibit G

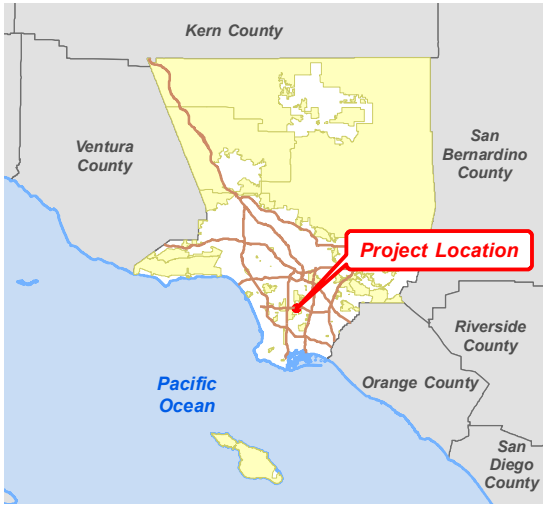
20-MILE RADIUS

LOCATOR MAP

PROJECT NO. PRJ2023-002770

CUP RPPL2023004092





Miles

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LA COUNTY PLANNING

LOS ANGELES COUNTY
Dept. of Regional Planning
320 W. Temple Street
Los Angeles, CA 90012

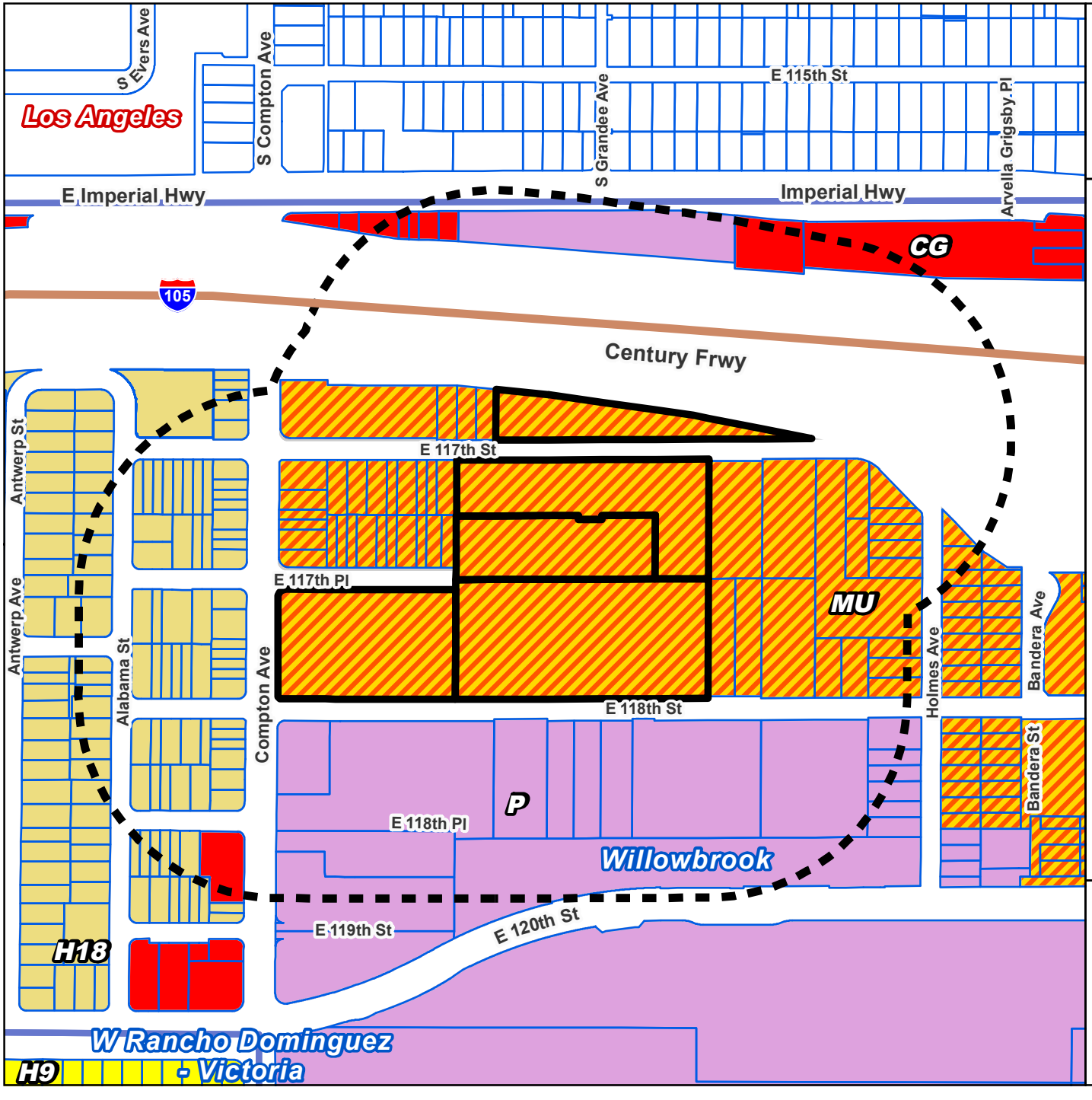
Exhibit G

LAND USE POLICY

500-FOOT RADIUS MAP

PROJECT NO. PRJ2023-002770

CUP RPPL2023004092



- H9 - Residential 9
- H18 - Residential 18
- CG - General Commercial
- MU - Mixed Use
- P - Public and Semi-Public

Feet

0 250 500

N

LOS ANGELES COUNTY
Dept. of Regional Planning
320 W. Temple Street
Los Angeles, CA 90012

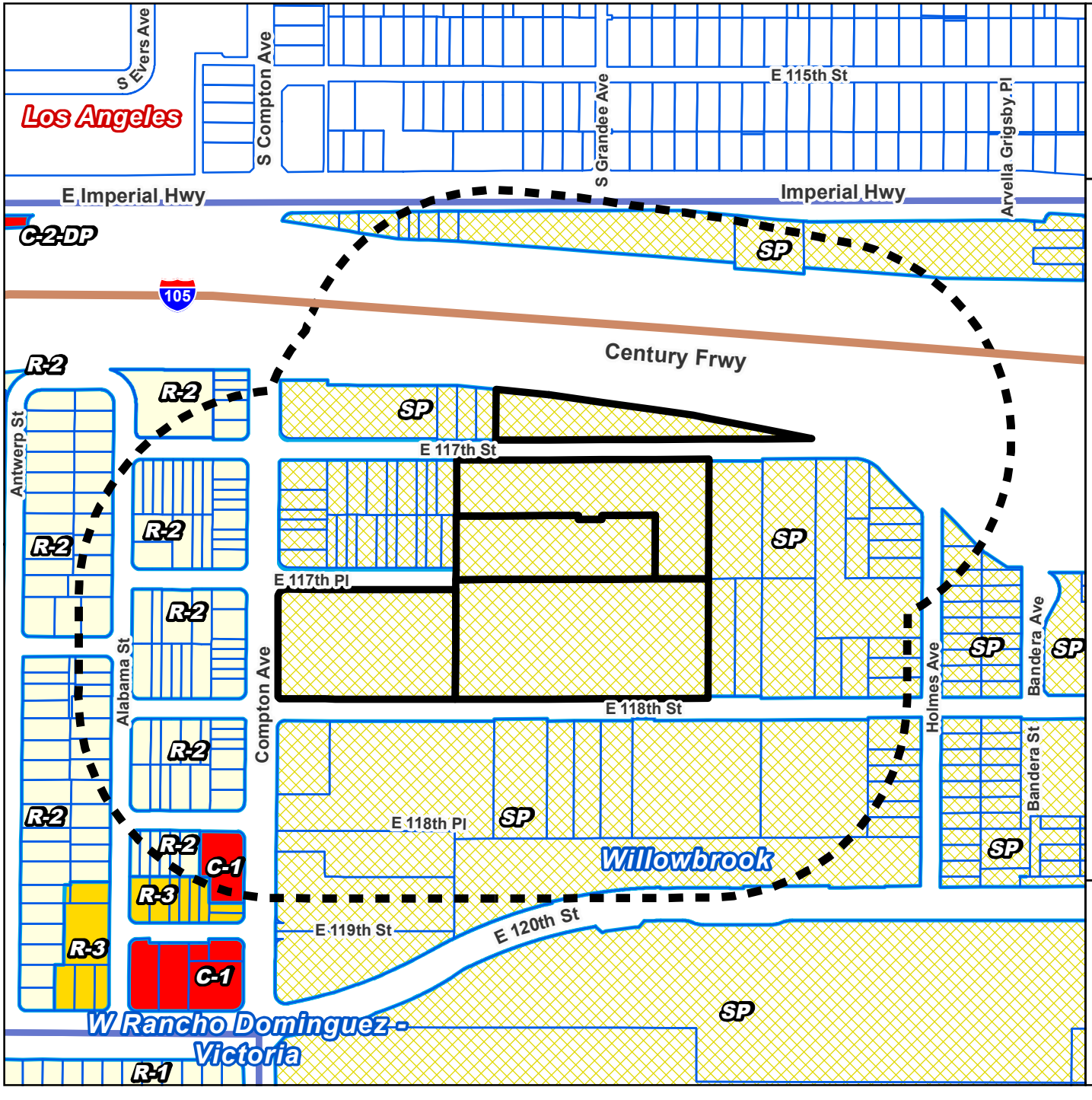
Exhibit G

ZONING

500-FOOT RADIUS MAP

PROJECT NO. PRJ2023-002770

CUP RPPL2023004092



- R-1 - Single-Family Residence
- R-2 - Two-Family Residence
- R-3-()U - Limited Density Multiple Residence
- C-1 - Restricted Business
- C-2 - Neighborhood Business
- SP - Specific Plan

Feet

0 250 500

N

LOS ANGELES COUNTY
Dept. of Regional Planning
320 W. Temple Street
Los Angeles, CA 90012

Exhibit H

ORDINANCE NO. _____

An ordinance amending Title 22 – Planning and Zoning of the Los Angeles County Code to amend principal use regulations and development standards of the Willowbrook Transit-Oriented District Specific Plan ("Specific Plan") as of August 2, 2023 applicable to projects in the Mixed Use 1 and Mixed Use 2 Zones and brings the Specific Plan into compliance with current County policies.

The Board of Supervisors of the County of Los Angeles ordains as follows:

SECTION 1 Section 3.5. is hereby amended to read as follows:

3.5 Mixed Use Zones

...

B. Land Use Regulations

...

Table 3-2

Principal Use Regulations for Mixed Use Zones

Use	MU-1	MU-2	Additional Regulations
Agricultural and Resource Based Uses			
Community Garden	SPR	SPR	
Animal Related Uses			
Veterinaries, small animal			
A. Clinics	SPR	--	
B. Hospitals	CUP	--	
Cultural, Education, and Institution Uses			

Churches, temples, or other places used exclusively for religious worship, including accessory educational and social activities	SPR	CUP	
Community centers, including accessory facilities	SPR	SPR	
Libraries	SPR	SPR	
Museums	SPR	SPR	
School, including accessory facilities			Section 22.364.060.F.2 for elementary and secondary schools
A. College, university, professional	CUP	CUP	
B. Elementary and secondary (public)	SPR	SPR	
C. Elementary and secondary (private)	--	CUP	
D. Vocational, technical and trade schools	SPR	CUP	
E. Tutorial, dance, art, martial arts, drama, etc.	SPR	SPR	
Theaters and other auditoriums	CUP	--	
Industrial Uses			
Laboratories, research, and testing	--	CUP	
Lodging Uses			
Hotel	--	CUP	
Recreational Uses			
Billiards or pool halls	CUP	--	
Bowling Alleys	CUP	--	
Gymnasiums	SPR	SPR	

Parks, playgrounds, and open space (plazas, etc.)	SPR	SPR	
Residential Uses			
Adult residential facility serving six or fewer persons	P	P	Chapter 22.140.520
Foster family homes	P	P	
Group homes for children serving six or fewer persons	P	P	Chapter 22.140.520
Joint live/work units	SPR	SPR	Chapter 22.140.520
Multifamily housing			Chapter 22.140.600
A. Apartment Houses	SPR	SPR	
B. Townhomes	SPR	SPR	
Senior citizen housing	--	SPR	
Student and staff housing	--	SPR	
Retail and Commercial Uses			
Art gallery	SPR	SPR	
Drug store or pharmacy	SPR	SPR	
Farmer's market	SPR	SPR	
Food and beverage sales			
A. Grocery stores and markets	SPR	SPR	
B. Specialty stores (deli, coffee, bakery, produce)	SPR	SPR	
Health Clubs	SPR	CUP	
Home improvement, retail sales and service (hardware, lumber and building materials)			

A. Under 10,000 sq. ft	SPR	--	
B. 10,000 sq. ft or more	CUP	--	
Office machines and equipment sales	SPR	SPR	
Pet store, including the sale of pets (sales and grooming, no boarding)	SPR	--	
Retail Stores			
A. Under 10,000 sq. ft	SPR	SPR	
B. 10,000 sq. ft or more	SPR	--	
Secondhand stores	SPR	--	
Service Uses			
Banks and financial institutions	SPR	SPR	
Business support services and facilities (including graphic reproduction, computer services, etc.)	SPR	SPR	
Catering establishments	SPR	SPR	
Conference facilities	---	CUP	
Day care			
A. Adult day care	CUP	CUP	
B. Childcare center	SPR	SPR	
C. Large family childcare home	--	--	
D. Small family childcare home	P	P	
Health retreat	--	CUP	
Medical services – clinic, medical/dental offices, medical laboratory, and urgent/express care	SPR	SPR	
Offices, business and professional	SPR	SPR	

Personal services (barber, beauty salon, spa, tailor, dry cleaner, self-service laundry, etc.)	SPR	SPR	
Parking lots and parking structures (stand alone)	SPR	SPR	Chapter 22.112
Repair shops, household and fix-it	SPR	--	
Restaurants and other establishments, including food take out and outdoor dining	SPR	SPR	Chapter 22.140.410
Transportation, Electrical, Gas, Communication Utilities and Public Service Uses			
Comfort stations	SPR	SPR	
Communications equipment buildings	SPR	SPR	
Earth station	CUP	CUP	
Electrical distribution substation, including related microwave facilities	SPR	SPR	Chapter 22.140.200
Fire station	SPR	SPR	
Gas metering and control stations, public utility	SPR	SPR	
Microwave stations	SPR	SPR	
Police station	SPR	SPR	
Post office	SPR	SPR	
Publicly owned uses, other than those already listed, that are necessary to maintain the public health and convenience or general welfare	CUP	CUP	
Public utility service center	SPR	SPR	
Stations or stops; bus, rail, or taxi	SPR		
Telephone repeater station	SPR	SPR	

Water reservoirs, dams, treatment plants, gauging stations, pumping stations, tanks, wells and any use normal or accessory to the storage and distribution of water	CUP	CUP	
Wireless telecommunications facilitiies	SPR/CUP	SPR/CUP	As Specified in Section 22.140.760

...

SECTION 2 Section 3.5 is hereby amended to read as follows:

3.5 Mixed Use Zones

C. Development and Design Standards

1. General. Table 3-5 identifies the development standards applicable to all development in the Mixed Use Zones. Additional regulations contained in Title 22 and/or this Specific Plan are also identified.

Table 3-5

Development Standards for Mixed Uses

Development Standards	MU-1	MU-2	Additional Regulations
Lot Area Minimum	1 acre	1 acre	For new lots only. Lots may be subdivided to less than one acre for buildings that are part of a larger development in which parking and access is shared.
Minimum Street fronting yard depth			Additional setback may be required depending on existing street frontage.
East 199th Street	10 ft	n/a	
Willowbrook Avenue	20 ft	n/a	

Wilmington Avenue	5 ft	4 ft	
East 117th Street	n/a	10 ft	
East 117th Place	n/a	10 ft	
East 118th Street	n/a	10 ft	
Bandera Street	n/a	10 ft	
Holmes Avenue	n/a	10 ft	
Compton Avenue	n/a	15 ft	
Minimum Interior Yard (side or rear)	0 ft	0 ft	
Minimum Interior Yard (side or rear) from residential use	n/a	20 ft	
Building Height Maximum	50 ft and 4 stories	73~~50~~ ft; 110 ft for parking structures	Section 3.5.C.2. of this Chapter; Chapters 22.04 and 22.11
Floor Area Ratio Maximum	1.5	3.0	
Residential Density Maximum	30 du/ac	60 du/ac	
Nonresidential Common Open Space Area (courtyard or plaza Minimum)	1,000 sq. ft/acre	1,000 sq. ft/acre	Minimum size shall be 1,000 sf and minimum dimension shall be 25 ft
Residential Common Open Space Area Minimum	50 sq ft/du	50 sq. ft/du for at least 50% of the units; or 75 sq. ft/du for student housing if no private open space is provided	Required for Residential uses only. Minimum dimension shall be 25 feet.
Residential Private Open Space Area Minimum	50 sq. ft/du	50 sq. ft/du	Required for residential uses only. Minimum

			dimension shall be 5 ft. Not required for student housing if 75 sq. ft/du of total common open space is provided instead.
~~Residential Floor Area Minimum~~			~~Section 22.140.320 for live/work units~~
~~Efficiency~~	~~500 sq. ft~~	~~500 sq. ft~~	
~~One Bedroom~~	~~700 sq. ft~~	~~700 sq. ft~~	
~~Two Bedroom~~	~~900 sq. ft~~	~~900 sq, ft~~	
~~Three Bedroom~~	~~1100 sq. ft~~	~~1100 sq. ft~~	
~~Each Additional Bedroom~~	~~200 sq. ft~~	~~200 sq. ft~~	
~~Live/work unit~~	~~1,000 sq. ft~~	~~1,000 sq. ft~~	

...

SECTION 3 3.5 is hereby amended to read as follows:

3.5 Mixed Use Zones

...

7. Residential Open Space.

a. The minimum required common and private open space area for residential uses is listed in Table 3-5. More than one open space area may be provided on a lot. The sum of square footages for all eligible open space areas on a lot shall comprise the total open space area for that lot. Required side or rear yard areas may be included in the calculated open space area, but a required front yard area shall not be included.

b. Open space areas shall have no parking, driveway or right-of-way encroachments.

c. Private useable open space shall be contiguous to the residential unit served and screened from public view for privacy. All patios that front a public street shall be substantially enclosed for screening and privacy. All balconies that front a public street shall have solid rails for screening and privacy. Private open space areas that are intended for use by residents only shall not be accessible from the commercial portion of the mixed use development

d. For student housing, residential common open space provided in lieu of residential private open space shall be located within 500 feet of the student housing building(s) being served; shall be only accessible to the occupants of the building to which the common open space serves and shall only be accessible to the occupants of a building to which the common open space serves to distinguish it from other common open space that may be provided.

...

SECTION 4 Section 3.5 is hereby amended to read as follows:

3.5 Development Standards

...

11. Parking lots.

a) Parking areas shall be designed with end stall turnarounds or a continuous circulation pattern.

b) Parking is not permitted in the required street fronting yard.

c) Continuous concrete curbs shall be provided as wheel stops where parking adjoins landscaping.

d) Parking areas shall be separated from buildings by a pedestrian walkway and/or landscape strip.

e) Separate parking facilities shall be provided for residential uses and commercial uses~~.~~, except for student or staff housing on a university campus.

Exhibit H

ORDINANCE NO. _____

An ordinance amending Title 22 – Planning and Zoning of the Los Angeles County Code to amend principal use regulations and development standards of the Willowbrook Transit-Oriented District Specific Plan ("Specific Plan") applicable to projects in the Mixed Use 1 and Mixed Use 2 Zones and brings the Specific Plan into compliance with current County policies.

The Board of Supervisors of the County of Los Angeles ordains as follows:

SECTION 1 Section 22.412.040.B. is hereby amended to read as follows:

22.412.040.B.2. Principal Uses.

Table 22.412.040-B, below, identifies the principal uses and the permit of review required to establish each use in the Mixed Use Zones. Additional regulations contained in this Title 22 are also identified. Principal uses may be established on a single site, either as an integrated project or as stand-alone use, subject to the provisions of this Chapter.

TABLE 22.412.040-B: PRINCIPAL USE REGULATIONS FOR MIXED USE ZONES			
Use	MU-1	MU-2	Additional Regulations
Agricultural and Resource Based Uses			
Community Garden	SPR	SPR	
Animal Related Uses			
Veterinaries, small animal			
1. Clinics	SPR	--	
2. Hospitals	CUP	--	

Cultural, Education, and Institution Uses			
Churches, temples, or other places used exclusively for religious worship, including accessory educational and social activities	SPR	SPR	
Community centers, including accessory facilities	SPR	SPR	
Libraries	SPR	SPR	
Museums	SPR	SPR	
School, including accessory facilities			Section 22.364.060.F.2 for elementary and secondary schools
- College, university, professional	CUP	CUP	
- Elementary and secondary (public)	CUP	CUP	
- Elementary and secondary (private)	--	CUP	
- Vocational, technical and trade schools	SPR	CUP	
- Tutorial, dance, art, martial arts, drama, etc.	SPR	SPR	
Theaters and other auditoriums	CUP	--	
Industrial Uses			
Laboratories, research, and testing	--	CUP	
Lodging Uses			
Hotel	--	CUP	
Recreational Uses			
Billiards or pool halls	CUP	--	
Bowling Alleys	CUP	--	

Gymnasiums	SPR	SPR	
Parks, playgrounds, and open space (plazas, etc.)	SPR	SPR	
Residential Uses			
Adult residential facility serving six or fewer persons	P	P	Chapter 22.140.520
Foster family homes	P	P	
Group homes for children serving six or fewer persons	P	P	Chapter 22.140.520
Joint live/work units	SPR	SPR	Chapter 22.140.520
Multifamily housing			Chapter 22.140.600
- Apartment Houses	SPR	SPR	
- Townhomes	SPR	SPR	
Senior citizen housing	--	SPR	
Student and staff housing	--	SPR	
Retail[1] and Commercial Uses			
Art gallery	SPR	SPR	
Drug store or pharmacy	SPR	SPR	
Farmer's market	SPR	SPR	
Food and beverage sales			
- Grocery stores and markets	SPR	SPR	
- Specialty stores (deli, coffee, bakery, produce)	SPR	SPR	
Health Clubs	SPR	SPR	

Home improvement, retail sales and service (hardware, lumber and building materials)			
- Under 10,000 sq. ft	SPR	--	
- 10,000 sq. ft or more	CUP	--	
Office machines and equipment sales	SPR	SPR	
Pet store, including the sale of pets (sales and grooming, no boarding)	SPR	--	
Retail Stores			
- Under 10,000 sq. ft	SPR	SPR	
- 10,000 sq. ft or more	SPR	--	
Secondhand stores	SPR	--	
Service Uses			
Banks and financial institutions	SPR	SPR	
Business support services and facilities (including graphic reproduction, computer services, etc.)	SPR	SPR	
Catering	SPR	SPR	
Conference facilities	---	CUP	
Day care			
- Adult day care	SPR	SPR	
- Childcare center	SPR	SPR	
- Large family childcare home	--	--	
- Small family childcare home	P	P	
Health retreat	--	CUP	

Medical services – clinic, medical/dental offices, medical laboratory, and urgent/express care	SPR	SPR	
Offices, business and professional	SPR	SPR	
Personal services (barber, beauty salon, spa, tailor, dry cleaner, self-service laundry, etc.)	SPR	SPR	
Parking lots and parking structures (stand alone)	SPR	SPR	Chapter 22.112
Repair shops, household and fix-it	SPR	--	
Restaurants and other establishments, including food take out and outdoor dining	SPR	SPR	Chapter 22.140.410
Transportation, Electrical, Gas, Communication Utilities and Public Service Uses			
Comfort stations	SPR	SPR	
Communications equipment buildings	SPR	SPR	
Earth station	CUP	CUP	
Electrical distribution substation, including related microwave facilities	SPR	SPR	Chapter 22.140.200
Fire station	SPR	SPR	
Gas metering and control stations, public utility	SPR	SPR	
Microwave stations	SPR	SPR	
Police station	SPR	SPR	
Post office	SPR	SPR	
Publicly owned uses, other than those already listed, that are necessary to maintain the public health and convenience or general welfare	CUP	CUP	

Public utility service center	SPR	SPR	
Stations or stops; bus, rail, or taxi	SPR	SPR	
Telephone repeater station	SPR	SPR	
Any use normal or accessory to the storage or distribution or public water	CUP	CUP	
Wireless telecommunications facilitiies	SPR/CUP	SPR/CUP	As Specified in Section 22.140.760
Note: 1. Retail uses are required on the ground floor fronting Wilmington Avenue and East 119th Street.			

...

SECTION 2 Section 22.412.040.C. is hereby amended to read as follows:

22.412.040.040.C. Development Standards

1. General. Table 22.412.040-F, below, identifies the development standards applicable to all development in the Mixed Use Zones. Additional regulations contained area also identified.

TABLE 22.412.040-F: DEVELOPMENT STANDARDS FOR MIXED USE ZONES			
Development Standards	MU-1	MU-2	Additional Regulations
Lot Area Minimum	1 acre	1 acre	For new lots only. Lots may be subdivided to less than one acre for buildings that are part of a larger development in which parking and access is shared.
Minimum Street fronting yard depth			

A. East 199th Street	10 ft	n/a	Additional setback may be required depending on existing street frontage.
B. Willowbrook Avenue	20 ft	n/a	
C. Wilmington Avenue	5 ft	4 ft	
D. East 117th Street	n/a	10 ft	
E. East 117th Place	n/a	10 ft	
F. East 118th Street	n/a	10 ft	
G. Bandera Street	n/a	10 ft	
H. Holmes Avenue	n/a	10 ft	
I. Compton Avenue	n/a	15 ft	
Minimum Interior Yard (side or rear)	0 ft	0 ft	For existing residences of one to three primary units (excluding accessory dwelling unit and junior accessory dwelling unit): -Side yard: 5 ft or 10% of the lot in no case less than 3 ft -Rear yard: 15 ft
Minimum Interior Yard (side or rear) from residential use	n/a	20 ft	Only applicable to Mixed-Use Projects
Building Height Maximum	50 ft	73~~50~~ ft; 110 ft for parking structures	Chapter 22.04 and 22.110
Floor Area Ratio Maximum	1.5	3.0	
Residential Density Maximum	30 du/ac	60 du/ac	
Nonresidential Common Open Space Area (courtyard or plaza Minimum)	1000 sq. ft/ac	1000 sq. ft/ac	Minimum size shall be 1,000 sf and minimum dimension shall be 25 ft

Residential Common Open Space Area Minimum	50 sq ft/du	50 sq. ft/du for at least 50% of the units; or 75 sq. ft/du for student housing if no private open space is provided	
Residential Private Open Space Area Minimum	50 sq. ft/du	50 sq. ft/du	Required for residential uses only. Minimum dimension shall be 5 ft. Not required for student housing if 75 sq. ft/du of total common open space is provided instead.
~~Residential Floor Area Minimum~~			~~Section 22.140.320 for live/work units~~
~~A. Efficiency~~	~~500 sq. ft~~	~~500 sq. ft~~	
~~B. One Bedroom~~	~~700 sq. ft~~	~~700 sq. ft~~	
~~C. Two Bedroom~~	~~900 sq. ft~~	~~900 sq, ft~~	
~~D. Three Bedroom~~	~~1100 sq. ft~~	~~1100 sq. ft~~	
~~E. Each Additional Bedroom~~	~~200 sq. ft~~	~~200 sq. ft~~	
~~F. Live/work unit~~	~~1,000 sq. ft~~	~~1,000 sq. ft~~	

...

SECTION 3 Section 22.412.040.C. is hereby amended to read as follows:

22.412.040.040.C. Development Standards

...

7. Residential Open Space.

a. Required side or rear yard areas may be included in the calculated open space area, but a required front yard area shall not be included.

b. Open space areas shall have no parking, driveway, or right-of-way encroachments.

c. Private open space shall be contiguous to the residential unit served.

d. All patios that front a public street shall be substantially enclosed with solid walls or fencing for screening and privacy.

e. All balconies shall have solid railings for screening and privacy.

f. Open space areas for use by residents shall not be accessible from the commercial portion of the mixed use development.

g. For student housing, residential common open-space provided in lieu of residential private open space shall be located within 500 feet of the student housing building(s) being served; shall be only accessible to the occupants of the building to which the common open space serves; and shall only be accessible to the occupants of a building to which the common open space serves to distinguish it from other common open space that may be provided.

...

SECTION 4 Section 22.412.040.C. is hereby amended to read as follows:

22.412.040.040.C. Development Standards

...

11. Parking lots shall be designed with end-stall turnarounds or a continuous circulation pattern.

a. Parking is not permitted in the required street-fronting yard.

b. Concrete curbs shall be provided as wheel stops where parking adjoins landscaping.

c. Parking areas shall be separated from buildings by a pedestrian walkway or landscape strip.

d. Separate parking facilities shall be provided for residential uses and commercial uses~~.~~, except for student or staff housing on a university campus.

...

SECTION 5 Section 22.412.120 is hereby amended to read as follows:

22.412.120 TOD Parking Reduction Overlay Zone

...

B. Nonresidential Uses.

1. Except as specified otherwise by State law, the minimum parking required for nonresidential uses shall be 40 percent of the required parking spaces specified in Section 22.112.070.

2. Off-Site Parking. Off-site parking facilities may be proposed for nonresidential uses, subject to Chapter 22.178 (Parking Permits), provided such facilities are located within 1,500 feet from the site of the development~~.~~

except required or provided parking for student or staff housing on a university campus may be located within 500 feet of the parcel on which the residential uses are located without a parking permit.

Exhibit I

RECORDING REQUESTED BY:

LOS ANGELES COUNTY DEPT. OF REGIONAL PLANNING

AND WHEN RECORDED MAIL TO:

[Insert company name]
[Street address]
[City, state, zip]
Attention: [name, title]

Exempt from Recording Fees (Govt. Code §§ 6103 and 27383)

DEVELOPMENT AGREEMENT

by and among

THE COUNTY OF LOS ANGELES

and

CDU/MLK WELLNESS COLLABORATIVE, LLC

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DEVELOPMENT AGREEMENT

This Development Agreement (this "**Agreement**") is executed this _____ day of _____, 2026, and is effective pursuant to Section 7.1 below, by and among the COUNTY OF LOS ANGELES, a body corporate and politic (the "**County**") and CDU/MLK WELLNESS COLLABORATIVE, LLC, a California limited liability company (the "**Collaborative**"), pursuant to California Government Code Section 65864 *et seq.,* Title 22, Chapter 22.162 of the County Code, and the implementing procedures of the County, with respect to the following. Each of the County and the Collaborative are occasionally referred to herein as a "**Party**" and collectively as the "**Parties**."

RECITALS

A. **WHEREAS**, to strengthen the public planning process, to encourage private participation in comprehensive planning, and to reduce the economic risk of development, the Legislature of the State of California adopted the Development Agreement Act (defined below), which authorizes the County to enter into a property development agreement with any person having a legal or equitable interest in real property for development of such property in order to establish certain development rights in the real property that is the subject of the proposed development project.

B. **WHEREAS**, pursuant to the Development Agreement Act, the County adopted the Development Agreement Ordinance (defined below), establishing procedures and requirements for entering into a development agreement with a private developer pursuant to the Development Agreement Act, which agreement vests certain rights and requires a developer to provide certain public benefits beyond those that could otherwise be imposed as conditions of development. The Parties are entering into this Agreement in accordance with the Development Agreement Act and the Development Agreement Ordinance.

C. **WHEREAS**, the Collaborative is a joint venture comprised of Charles R. Drew University of Medicine and Science, a California nonprofit public corporation ("**University**"), and Century Affordable Development Inc., a California nonprofit public benefit corporation ("**Century**" and together with University, the "**Members**"). The Collaborative serves as the coordinating entity of its Members; individual Members (or their Assignee after Assignment (defined below)) will construct the Project (defined below) consistent with the terms and conditions set forth in the Ground Leases (defined below) and the Entitlements (defined below).

D. **WHEREAS**, on _____, the Los Angeles County Development Authority ("**LACDA**"), executed a quitclaim deed transferring fee ownership of property to the Compton Unified School District (the "**District**") as described in the definition District Property.

E. **WHEREAS**, the District owns in fee or otherwise retains a legal or equitable interest in the District Property (defined below). The District Property and the Street Vacation area (defined below), which are within the unincorporated County, under the County's land use jurisdiction, and located within one half mile of a Major Transit Stop (defined below), collectively constitute the "**Project Site**."

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F. **WHEREAS**, in response to a Request for Proposals (the "**RFP**") issued by the District and LACDA, on or about November 19, 2019, the Collaborative submitted a proposal to develop the Project Site with a mixed use development consisting of affordable housing, University faculty/staff housing, office, retail, research, community and clinic space, athletics and recreational facilities, and parking for the to-be-developed uses, which was the selected highest ranked response to the RFP.

G. **WHEREAS**, on April 7, 2021, District, LACDA, and Collaborative entered into that certain ENA (defined below), pursuant to which the Parties are evaluating the potential development of the Project Site with the Project and negotiating agreements to facilitate such development.

H. **WHEREAS**, the Collaborative, in cooperation and collaboration with its Members, intends to develop the Project, all of which has been designed in consultation with the County and the District, to transform the Project Site in a manner that supports the University's mission to foster a student-centered university committed to cultivating diverse health profession leaders who are dedicated to social justice and health equity for underserved populations through outstanding education, clinical service, and community and the County and District's goals and objectives for the Project Site, including providing affordable housing. The Project will provide increased safety, vibrancy, walkability, community services, much-needed housing (including affordable, faculty/staff, and student housing), recreational opportunities, and economic and employment opportunities to the area of the unincorporated Willowbrook TOD Specific Plan (as defined in Recital I), thereby contributing to the economic health of the local economy and the health, safety and welfare of the local community.

I. **WHEREAS**, the Project will be developed in a manner that is consistent with the goals and policies in the Willowbrook Transit-Oriented Development Specific Plan that was originally approved by the County in August, 2018 (as amended, "**Willowbrook TOD Specific Plan**"), and as provided for by the Project Documents. The Project Site will be developed with complimentary design and Project Site connectivity, all in accordance with the Entitlements, their conditions of approval, and the approved Project Site Plan.

J. **WHEREAS**, while the Project will be developed with complimentary design and Project Site connectivity, to obtain financing and to achieve the broad Project objectives, the development of the Project Site will be divided into Phases (defined in Section 1.65).

K. **WHEREAS,** the Parties anticipate that, in order to facilitate the development and construction of the Project, (i) the University will execute up to seven (8) Ground Leases with the District for the development of the Wellness and Education Campus, and (ii) Century and the District will execute an option agreement, pursuant to which the District will provide Century with an exclusive right to execute up to five (5) Ground Leases for the Affordable Housing (the "**Option Agreement**").

L. **WHEREAS**, to allow the Project to be developed in Phases, the Collaborative intends to assign certain rights, title, and interests in and to this Agreement to one or more of the Members or the Affordable Member Partnerships (defined below) pursuant to the terms and conditions set forth in this Agreement, with Members causing development of individual Phases

of the Project, and the Collaborative, as applicant, maintaining the orderly development of the site in a coordinated and cohesive manner.

M. **WHEREAS**, the Collaborative will act as applicant to obtain the Entitlements and coordinate the development of common infrastructure.

N. **WHEREAS**, the County has determined that, pursuant to California Government Code Section 25536(a), development of the Parking Structure on the County Property serves a public purpose and is in the County and the public's best interests.

O. **WHEREAS**, the District has determined that pursuant to California Education Code Sections 17515 et seq., development of the District Property with the Project will serve a public purpose and is in the District's best interest.

P. **WHEREAS**, the Collaborative has proposed the development of the Project, which represents a substantial investment in the Willowbrook Community and County and desires to enter into a development agreement with the County in connection with development of the Project, including compliance with the various conditions and requirements of the Project, all of which will result in large expenditures of monies by the Collaborative and increased public benefits to the Willowbrook community.

Q. **WHEREAS**, to ensure that the County remains responsive and accountable to its residents while pursuing the benefits of development agreements contemplated by the State Legislature, the County: (1) accepts restraints on its police powers contained in the Agreement only to the extent and for the duration required to achieve the mutual objectives of the Parties; and (2) to offset such restraints, seeks public benefits from the Collaborative that go beyond those obtained by traditional County controls and conditions imposed on development project applications.

R. **WHEREAS**, the Collaborative wishes to obtain reasonable assurances that the Project may be developed in accordance with the Willowbrook TOD Specific Plan, the Project Documents, the Addendum (as defined in Recital W), the certified Willowbrook FEIR, and the terms of this Agreement, as the Collaborative anticipates making substantial capital expenditures in reliance upon this Agreement.

S. **WHEREAS**, the Collaborative and its Members will implement public benefits above and beyond the necessary mitigation required by State and local laws for the Project, including the creation of new jobs, programmed public access to the Recreational Facilities, programmed educational opportunities for K-12, health and learning opportunities made available on the Wellness and Education Campus, funding for various community improvements, and additional community benefits all as set forth in the attached Exhibit A; these public benefits serve as the consideration upon which the County bases its decision to enter into this Agreement.

T. **WHEREAS**, this Agreement is necessary to assure the Collaborative that the Project will not be reduced in density, intensity, or use or be subjected to new or modified rules, regulations, ordinances, or policies adopted or applied to the Project after the Effective Date of this Agreement, unless otherwise allowed by this Agreement, and this assurance serves as the

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consideration upon and the reliance for which the Collaborative bases its decision to enter into this Agreement.

U. **WHEREAS**, development of the Project in accordance with this Agreement will provide for the orderly development of the Project Site in accordance with the objectives set forth in the General Plan and the Willowbrook TOD Specific Plan. Moreover, a development agreement for the Project will eliminate uncertainty in planning for and securing orderly development of the Project Site, assure timely installation of necessary improvements, assure attainment of maximum efficient resource utilization within the County at the least economic cost to its citizens, and otherwise achieve the goals and purposes for which the Development Agreement Act was enacted.

V. **WHEREAS**, on _____, the Regional Planning Commission held duly noticed public hearings on this Agreement and the Entitlements. Following these public hearings, the Regional Planning Commission determined that the Project and the Agreement are, as a whole and taken in their entirety, consistent with the County's objectives, policies, general land uses, and programs specified in the General Plan, the Willowbrook TOD Specific Plan, and the Zoning Code. The Regional Planning Commission adopted resolutions recommending approval of the Project, including this Agreement, to the Board of Supervisors. The Regional Planning Commission transmitted to the Board of Supervisors its findings and recommendations.

W. **WHEREAS**, on _____, the Board of Supervisors, having received the Regional Planning Commission's recommendations, held a duly noticed- public hearing on this Agreement, the Entitlements. Thereafter, following the public hearing, on _____ the Board, as lead agency under the California Environmental Quality Act, California Public Resources Code §§ 21000 – 21177, ("**CEQA**"), considered and approved the Addendum to the Willowbrook FEIR (State Clearinghouse No. 2015101106) ("**Addendum**"), also known as Environmental Assessment No. RP–L2023004097, and determined based on substantial evidence in the whole administrative record, that Project activities do not result in the need to prepare a supplemental or subsequent EIR and indicated its intent to approve the Entitlements, including this Agreement, finding that the Agreement is consistent with the General Plan and Zoning Code. The following Entitlements relating to the Project were approved by the Board concurrently with this Agreement: Administrative Housing Permit No. RPPL2023004095, Development Agreement No. RPPL2023005669, Conditional Use Permit No. RPPL2023004092, General Plan Amendment No. RPPL2023004093, and Ministerial Site Plan Review No. RPPL2024001835. The Board also approved the quitclaim deed transferring certain LACDA property to the District as further described in the definition District Property, below.

X. **WHEREAS**, on _____, 2026 the County, through its Board of Supervisors, in accordance with the Development Agreement Act, adopted Ordinance No. [_____] ("**Enacting Ordinance**"), approving this Agreement and authorizing the Chair of the Board of Supervisors to execute this Agreement, subject to the receipt by the Executive Officer-Clerk of the Board of the Agreement executed by Collaborative within 30 days of the date of Board approval, finding that this Agreement is in the public interest and is consistent with the County's General Plan and Zoning Code. The Enacting Ordinance is effective 30 days after the date of approval of such ordinance, provided the executed Development Agreement is received by the Executive Officer-Clerk of the Board within that 30-day time period.

Y. **WHEREAS**, County represents and warrants that any actions concerning the Entitlements taken by County and the approval of this Agreement have been duly taken or approved in accordance with all applicable legal requirements for notice, public hearings, findings, votes, and other procedural matters.

Z. **WHEREAS**, for the foregoing reasons, the Parties desire to enter into this Agreement for the Project pursuant to the Development Agreement Act, as defined below, and the County powers upon the terms and conditions set forth herein.

AGREEMENT

NOW, **THEREFORE**, pursuant to the authority contained in the Development Agreement Act and the Development Agreement Ordinance, in consideration of the foregoing Recitals, which are hereby incorporated into this Agreement as if set forth in full herein, and in consideration of the mutual promises, obligations, and covenants herein contained, the Parties agree as follows:

1. DEFINITIONS.

For all purposes of this Agreement, except as otherwise expressly provided or unless the context requires:

1.1 "Addendum" has the meaning set forth in Recital W.

1.2 "Affiliate" has the meaning set forth in Section 7.10.4.

1.3 "Agreement" has the meaning set forth in the Preamble.

1.4 "Affordable Housing" means that portion of the Project undertaken for an affordable housing program by Century, or an Affordable Member Partnership, pursuant to the Project Documents, for the development of not less than 220 and up to two hundred and fifty four (254) deed-restricted affordable housing units set aside for 99-years and restricted to qualified residents whose incomes do not exceed 80 percent of AMI (as defined in Section 1.6), including up to one hundred and ninety-eight (198) affordable housing units distributed among four (4) four-story buildings and consisting generally of one, two, and three bedroom units, up to four (4) exempt manager's units (one in each building), and approximately one hundred and six (106) parking spaces, and up to fifty-three (53) units of affordable senior housing in a single four-story building consisting of one bedroom units, one (1) manager's unit, and approximately twenty-seven (27) parking spaces. Each building will be constructed pursuant to a Ground Lease, subject to and in accordance with the requirements set forth therein and applicable Entitlements.

1.5 "Affordable Member Partnership" means a limited partnership, in which a limited liability company controlled by Century serves as a general partner, each of which would be a party to one or more of the Ground Leases for the Affordable Housing.**"AMI"** means area median income, as adjusted for family size, as defined by the U.S. Department of Housing and Urban Development.

1.7 "Annual Review" has the meaning set forth in Section 5.1.

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1.8 "Applicable Rules" means the Rules, Regulations, and Official Policies (as defined in Section 1.78) in effect as of the Effective Date of this Agreement, pertaining to the Project to the extent such are not superseded or modified by the Entitlements, a copy of which are attached as Exhibit D.

1.9 "Aquatics Wing" has the meaning set forth in Section 1.8.

1.10 "Assignee" has the meaning set forth in Section 7.10.

1.11 "Assignment" has the meaning set forth in Section 7.10.

1.12 "Assignor" has the meaning set forth in Section 7.10.

1.13 "Athletics Facilities" means the one (1) one-story building with mezzanine with approximately 43,100 square feet of athletics facilities including an approximately 20,600 square foot pool facility wing that includes a 25-yard swimming pool, seating for guests, swimmers and visitors, restrooms, locker rooms, fitness rooms and other facilities ("**Aquatics Wing**"), and an approximately 22,500 square foot gymnasium wing that includes an NBA regulation size basketball court (94 feet by 50 feet), a walk/run track, and bleacher seats ("**Gymnasium Wing**").

1.14 "Athletics Field" means the approximately 100 yards by 60 yards athletics field with portable bleachers.

1.15 "Board of Supervisors" or "Board" means the Board of Supervisors of the County, which is the "legislative body" of the County as referenced in Section 65867 of the Development Agreement Act.

1.16 "CEQA" means the California Environmental Quality Act (Cal. Public Resources Code Sections 21000 *et seq.*) and the State CEQA Guidelines (Cal. Code of Regs., Title 14, Sections 15000 *et seq.*)

1.17 "**California Building Standards Code**" means those building, electrical, mechanical, fire and other similar regulations, which are mandated by state law and which become applicable throughout the County, including, but not limited to, the California Building Code, the California Electrical Code, the California Mechanical Code, the California Plumbing Code, the Building Efficiency Standards (24 Cal. Code Regs. Pt. 6) and the California Fire Code (along with those amendments to the promulgated California codes which reflect local modification to implement requirements justified by local conditions, as allowed by state law, and which are applicable County-wide).

1.18 "Century" has the meaning set forth in Recital C.

1.19 "Collaborative" has the meaning set forth in the Preamble.

1.20 "Community Benefits" means the public and community benefits to be performed and provided by Collaborative and its individual Members or their Assignees in connection with this Agreement as identified in Exhibit A.

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1.21 "Compliance Certificate" has the meaning set forth in Section 5.2.

1.22 "Controlling Entity" has the meaning set forth in Section 7.10.4.

1.23 "County" means the County of Los Angeles, a body corporate and a political subdivision of the State of California, and each and every agency, department, board, commission, authority, employee, and/or official acting under the authority of the County, including, without limitation, the Board of Supervisors and the Regional Planning Commission.

1.24 "Development Agreement Act" means Article 2.5 of Chapter 4 of Division 1 of Title 7 (Sections 65864 through 65869.5) of the California Government Code.

1.25 "Development Agreement Ordinance" means Title 22, Chapter 22.162 of the Los Angeles County Code.

1.26 "Development Schedule" has the meaning set forth in Section 2.3.

1.27 "Director" means the Director of the Department of Regional Planning for the County.

1.28 "Disputes" has the meaning set forth in Section 7.6.

1.29 "District" has the meaning set forth in Recital D.

1.30 "District Property" means (a) that certain real property and improvements located within the Willowbrook TOD Specific Plan Area and the Metro Planning Area in the unincorporated Willowbrook neighborhood of Los Angeles County, California, of which the District is the fee owner, at the property commonly identified as 1667 East 118th Street, further identified as APN Nos. 6149-012-901, 6149-014-900, 6149-014-903, and 6149-014-904, and more fully described and depicted in Exhibit B and (b) that certain real property and improvements located within the Willowbrook TOD Specific Plan Area and the Metro Planning Area in the unincorporated Willowbrook neighborhood of Los Angeles County, California, of which the District is the fee owner, pursuant to a quitclaim deed dated [insert date], executed by LACDA, located at the 1660 block of East 117th Street, and identified as APN No. 6149-014-906, and more fully described and also depicted in Exhibit B.

1.31 "East 118th Street Pedestrian Promenade" means the approximately 700 linear feet of privately-owned, publicly accessible outdoor open space for pedestrian and bicycle travel in the Street Vacation area of East 118th Street, to provide pedestrian and bicycle travel, a drop-off/turnaround accessible from Compton Avenue along the western portion of East 118th Street to allow for drop-off, pedestrian loading or deliveries, and a second drop-off/turnaround adjacent to the existing Charles R. Drew University surface parking lot on the north and south sides of East 118th Street. The pedestrian promenade also includes landscaped and seating areas adjacent to the proposed buildings on the north and south sides, as well as pedestrian walkways and bicycle lanes. In addition, the pedestrian promenade will have periodic vehicular use for such events as, but not limited to, event set up, such as a weekly farmer's market, a health fair, and other community events or for University student housing move-in/move-out days. The East 118th Street Pedestrian Promenade will comply with applicable California Building Standards Code requirements and is

more fully described in the Community Benefits attached as Exhibit A and graphically depicted in Exhibit L.

1.32 "Effective Date" is the date on which this Agreement shall be effective in accordance with Section 7.1 hereof.

1.33 "ENA" means that certain Exclusive Negotiation Agreement authorized for execution by the District Board of Trustees on August 11, 2020, and executed on April 7, 2021 by District, LACDA, and Developer as parties, inclusive of that certain Amendment No. 1 dated April 7, 2022, and that certain Amendment No. 2 dated October 4, 2022, and that certain Amendment No. 3, dated _____, and that certain Amendment No. 4, dated _____.

1.34 "Enacting Ordinance" has the meaning set forth in Recital X.

1.35 "Enforced Delay" has the meaning set forth in Section 6.4.

1.36 "Entitlements" means the land use approvals and entitlements relating to the Project approved by the Board of Supervisors, which include: (a) Administrative Housing Permit No. RPPL2023004095 to facilitate the provision of Affordable Housing and to request a housing incentive to provide a zero-foot step-back on a four (4)-story building (Building A5) with frontage on Compton Avenue in lieu of a 10-foot step-back on the fourth floor and a housing incentive to allow a 9-foot setback on Compton Avenue for Building A5 in lieu of a 15-foot setback; and a housing incentive to allow a 9-foot setback on Compton Avenue for Building A5 in lieu of a 15-foot setback; (b) Development Agreement No. RPPL2023005669 to set forth the scope and schedule for development of the Project; (c) Conditional Use Permit No. RPPL2023004092 to permit the construction of a 12.8-acre campus expansion of the University for the Wellness and Education Campus; (d) General Plan Amendment No. RPPL2023004093 to amend the Willowbrook TOD Specific Plan and allow up to five stories and 70 feet for the one (1) Faculty/Staff Housing building, three (3) Student Housing and University-Oriented Retail Space buildings, and the one (1) University Supportive Space, Community Space, and Parking building on the Project Site, for height of the Parking Structure, to reduce square footage requirements for unit sizes, and to define the required open space for Student Housing; and (e) Ministerial Site Plan Review No. RPPL2024001835 to permit the Affordable Housing buildings.

1.37 "Estoppel Certificate" has the meaning set forth in Section 5.2.

1.38 "Executive Officer" has the meaning set forth in Section 7.16.

1.39 "Exempt Transfers" has the meaning set forth in Section 7.10.4.

1.40 "Faculty/Staff Housing" means that portion of the Project undertaken by University to develop approximately 55 housing units for University faculty and staff in one 54,750 square foot, 5-story structure.

1.41 "Fees" means Impact Fees, Processing Fees, and any other fees or charges imposed or collected by the County.

1.42 "Final Improvements" means the final Project Site improvements that include development of the Affordable Housing and the Wellness and Education Campus in the separate leasehold areas depicted in Exhibit C.

1.43 "Future Rules" means new or modified Rules, Regulations, and Official Policies adopted by the County after the Effective Date as defined in Section 3.2 hereof.

1.44 "General Plan" means the adopted General Plan for the County.

1.45 "Ground Lease(s)" means up to thirteen (13) separate ground leases, which may include (a) up to seven (7) ground leases between the District and the University the development of the Wellness and Education Campus, and (b) up to five (5) ground leases between the District and Century, or the Affordable Member Partnerships, for the development of the Affordable Housing, as preliminarily depicted in Exhibit C attached hereto. Each Ground Lease shall represent a separate and distinct leasehold interest, project ownership, and financing, and each shall be tailored to meet the specific needs and obligations of the portion of the Project that it supports.

1.46 "Gymnasium Wing" has the meaning set forth in Section 1.8.

1.47 "Impact Fees" means any fee established by the County with respect to development and its impacts pursuant to any governmental requirements, including without limitation fees adopted pursuant to Section 66000 *et. seq.* of the California Government Code, dedication requirements, linkage fees, exactions, assessments or fair share charges, or any other similar impact fees, charges or exactions imposed on and in connection with development undertaken pursuant to the Entitlements by the County pursuant to Rules, Regulations, and Official Policies. Impact Fees shall not include (i) Processing Fees or (ii) other Countywide fees or charges of general applicability, provided that such Countywide fees or charges are not imposed on impacts of development.

1.48 "LACDA" has the meaning set forth in Recital D.

1.49 "Litigation" means any legal action instituted by any third party challenging any aspect of this Agreement or the Project Approvals. Without limiting the breadth of this provision, "**Litigation**" shall include includes third party claims challenging (1) the adoption, validity or application of any provision of this Agreement, and (2) the County's compliance with CEQA in adopting the Project Approvals.

1.50 "Maintenance" means all actual and necessary costs of repair, replacement, maintenance and other similar costs pertaining to the areas of the Project Site improved with the Final Improvements.

1.51 "Major Transit Stop" means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major or bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods, as defined in Public Resources Code section 21064.3.

1.52 "Members" means, collectively University and Century, which may be through a controlled affiliate, including Affordable Member Partnership. Each is a Member.

1.53 "Ministerial Implementing Approvals" means the ministerial permits, approvals, plans, inspections, certificates, documents, licenses, and all other actions sought or agreed to in writing by the Collaborative, Member, or occupant in or Member. In order to implement, develop, and construct the Project and implement the Mitigation Measures, including, without limitation, building permits, demolition permits, foundation permits, public works permits, grading permits, stockpile permits, encroachment permits, and other similar permits and approvals that are required by the County Code, Entitlements to implement the Project, and the Mitigation Measures.

1.54 "MOU" means the Memorandum of Understanding between the District and University regarding joint use of District Property in compliance with the Joint Occupancy Act (Education Code §§ 17515 et seq.).

1.55 "Mitigation Measures" means the mitigation measures described in the FEIR and in the MMRP.

1.56 "MMRP" means the Mitigation Monitoring and Reporting Program for the Willowbrook TOD Specific Plan, which was adopted by the County on September 18, 2018, and which is attached hereto and fully incorporated herein as Exhibit F, Mitigation Monitoring and Reporting Program.

1.57 "Mortgagee" means a mortgagee of a mortgage, a beneficiary under a deed of trust or any other secured party under a security-device or security agreement, and its successors and assigns.

1.58 "Notice of Default" has the meaning set forth in Section 6.1.2.

1.59 "Operating Memoranda" has the meaning set forth in Section 7.9.1.

1.60 "**Option Agreement**" has the meaning set forth in Recital K.

1.61 "Outdoor Open Space" means the areas of the Wellness and Education Campus (excluding the building footprints, private open space, and Recreational Facilities) which will generally be outdoor open space, landscaped space, and walking paths on the Wellness and Education Campus, that will be available to the public during regular operating hours when not in use by the University for its programs and events, with lighting, security call boxes, and wayfinding signage to encourage a pedestrian-friendly, safe, and open environment and to encourage access to and from the University campus.

1.62 "Parking Structure" means the approximately 637 space, 112-foot tall, 8-story parking structure with rooftop parking, a photovoltaics panel array on the canopy structure, and 11,500 square feet of University-related general storage and office uses for security and facilities staff. The parking may be used by visitors associated with the University and authorized community uses of the Wellness and Education Campus, including the Recreational Facilities.

1.63 "Parties" means collectively Collaborative and the County and any Assignee assigned rights to the Agreement pursuant to Section 7.10.

1.64 "Party" means any one of the Collaborative or the County and any Assignee assigned rights to the Agreement pursuant to Section 7.10.

1.65 "Phase" or **"Phases"** means each individual developable component of the Project, pursuant to and in accordance with the applicable Ground Lease for the respective portion of the Project.

1.66 "Processing Fees" means all processing fees and charges adopted by the Board of Supervisors and contained on an adopted fee schedule that are required by the County, including, but not limited to, fees for land use applications, project permits, building applications, building permits, grading permits, encroachment permits, tract or parcel maps, lot line adjustments, air right lots, street vacations, and certificates of occupancy that are necessary to implement the Project and the Mitigation Measures. Processing Fees do not include Impact Fees, except as specifically provided for in this Agreement.

1.67 "Project" means the Final Improvements developed on the Project Site, the Street Vacation area, and the Community Benefits.

1.68 "Project Documents" means the Ground Leases, Option Agreement, LACDA quitclaim deed to District, Entitlements, Street Vacation, Reciprocal Easement Agreement, Sublease, MOU, and Assignments.

1.69 "Project Site" has the meaning set forth in Recital E.

1.70 "Project Site Plan" means the overall site plan for the Project approved by the Entitlements.

1.71 "Property Owner" is the District, and its respective successors, transferees, and assignees pursuant to assignment in compliance with Section 7.10 below.

1.72 "Public Art" means public art as defined in the County's Public Art in Private Development Requirement.

1.73 "Reciprocal Easement Agreement" means the agreement that may be entered into if necessary between the Members (or their Assignees, including, without limitation, the Affordable Member Partnerships) to make an integrated use of the Project Site and allocate amongst themselves obligations and costs for the maintenance of common areas, and as further described at Section 2.4.

1.74 "Recreational Facilities" means the Athletics Field and Athletics Facilities.

1.75 "Regional Planning Commission" means the Regional Planning Commission of the County, which is the "planning agency" of the County, as referenced in Section 65867 of the Development Agreement Act.

1.76 "Reserved Powers" means those rights and authority excepted from this Agreement's restrictions on the County's police powers and which are instead expressly reserved to the County as provided in this Agreement. The Reserved Powers consist of the power to enact and implement Rules, Regulations, and Official Policies (defined below) after the Effective Date with respect to the Project that may be in conflict with the Entitlements but: (1) prevent or remedy conditions which the County has found based on substantial evidence to be injurious or detrimental to the public health or safety; (2) are California Building Standards Codes; (3) are necessary (subject to the provisions in the penultimate paragraph of Section 3.2) to comply with state or federal laws, rules and regulations (whether enacted previous or subsequent to the Effective Date) or to comply with a court order or judgment of a state or federal court; (4) are agreed to or consented to by Collaborative or its Members; or (5) are County-wide fees or charges of general applicability that are included in a County fee schedule adopted by the Board of Supervisors (provided that such County-wide fees or charges are not fees or charges imposed on or in connection with the impacts of new development in violation of the express limitations provided in Section 3.2.7 of this Agreement), subject to any rights under this Agreement or in law that permit a person to protest or challenge the imposition of such fee or charge.

1.77 "RFP" has the meaning set forth in Recital F.

1.78 "Rules, Regulations, and Official Policies" means the County rules, regulations, ordinances, laws, and officially adopted policies governing development, including, without limitation, the density and intensity of use, permitted uses, the maximum height and size of proposed buildings, the provision for the reservation or dedication of land, if any, for public purposes, the construction, installation, and extension of public improvements, environmental review, and other criteria relating to development or use of real property and which are generally applicable to the development of the Project Site.

1.79 "Security Plan" means the reasonable security protocols for the Project Site developed and implemented during the course of Project Site development.

1.80 "Specific Plan" or "Willowbrook TOD Specific Plan" means the Willowbrook TOD Specific Plan approved by the County on September 18, 2018, as amended.

1.81 "Street Vacation" means the approximately 700 linear foot street vacation of a portion of 118th Street to accommodate privately owned, publicly accessible open space for pedestrian and bicycle travel for the East 118th Street Pedestrian Promenade, with fire access as may be required by the Fire Department as depicted in Exhibit L.

1.82 "Student Housing and University-Oriented Retail Space" means that portion of the Project undertaken by University to develop approximately 250 apartments/suites in three 5-story structures for student housing, and the approximately 10,270 square feet of University-oriented retail space located within the Student Housing buildings accessible by and available to the public, but tenanted with a focus on catering to specific needs of the University community.

1.83 "Tax Credit Investor" means a tax credit investor in an Affordable Member Partnership and/or tax credit investor in the Wellness and Education Campus.

1.84 "Term" has the meaning set forth in Section 7.2 hereof.

1.85 "Transit Supportive Facilities" means facilities located on the Wellness and Education Campus supporting the use of public transportation.

1.86 "University" has the meaning set forth in Recital C.

1.87 "University Supportive Space, Community Space, and Parking" means the approximately 116,000 square feet of University supportive flexible use space connected to University's overall mission, which may include space to house healthcare administration, education, classroom, bioscience, medical offices and clinic, social service, and other similar supportive or office facilities and leased on market terms to potential tenants including, but not limited to, University, MLK Hospital, Drew Child Development Corporation, and each of their respective educational and/or healthcare related entities, and 5,000 square feet of University and District joint use space for community use (121,000 square feet total) with approximately 84 parking spaces below grade and/or in the Parking Structure.

1.88 "Wellness and Education Campus" means the Charles R. Drew University MLK/CDU Wellness and Education Campus, that portion of the Project Site undertaken by the University pursuant to the Project Documents to expand the existing CDU campus and facilities, which includes the Student Housing and University-Oriented Retail Space, Faculty/Staff Housing, University Supportive Office Space and Parking, Outdoor Open Space, the East 118th Street Pedestrian Promenade, Recreational Facilities, Parking Structure, and the Transit Supportive Facilities, developed in accordance with the Project Documents.

1.89 "Willowbrook FEIR" means the Willowbrook TOD Specific Plan Final Environmental Impact Report (State Clearinghouse No. 2015101106), approved by the County on August 9, 2017.

1.90 "Willowbrook TOD Specific Plan" has the meaning set forth in Recital I.

1.91 "Zoning Code" means Title 22 of the Los Angeles County Code.

2. OBLIGATIONS OF THE COLLABORATIVE

2.1 Project; Project to Include Community Benefits. The Collaborative seeks to develop in Phases a mixed-use development, consisting of the following major components, which are described in greater detail in the Definitions and in the Entitlements: the Affordable Housing, the Wellness and Education Campus, and an overall Project Site developed with complimentary design and Project Site connectivity, all in accordance with the Entitlements, their conditions of approval and the approved Project Site Plan. Moreover, consistent with the terms of the street vacation, the Collaborative shall be responsible for street surface maintenance and street trees currently in the public right of way that will be transferred following the vacation within the East 118th Street Pedestrian Promenade as a community benefit. Apart from the Willowbrook TOD Specific Plan and the Entitlements, and exclusively for purpose of implementing this Agreement, the Parties agree that in exchange for the rights conferred by this Agreement to the Collaborative, and in consideration of the obligations imposed by this Agreement on the County, those items defined as Community Benefits (and described in Exhibit A) shall also be considered part of the Project.

2.2 Leasehold Boundaries. As a condition precedent to the issuance of the first building permit related to Ministerial Site Plan Review No. RPPL2024001835 for the Affordable Housing, Century and/or its Affordable Member Partnership, shall finalize the affordable housing leasehold boundaries by obtaining a Certificate of Compliance or other instrument deemed sufficient by the Director of Regional Planning or her designee to reflect leasehold boundaries for purposes of building permit issuance, without requiring a formal subdivision, lot line adjustment, or parcel map, to the extent permitted under the Subdivision Map Act and applicable law and amending Exhibit C to this Agreement therewith. As a condition precedent to the issuance of the first building permit related to Conditional Use Permit No. RPPL2023004092, the University shall finalize the Wellness and Campus leasehold boundaries by obtaining a Certificate of Compliance from the Director of Regional Planning or her designee and amending Exhibit C to this Agreement therewith. For the avoidance of doubt, Century and/or its Affordable Member Partnership shall have no obligation to pursue or finalize leasehold boundaries or obtain a Certificate of Compliance unless and until Century exercises its rights under the Option Agreement.

2.3 Overall Development Schedule; Timing of Development. The Collaborative will develop the on-site and off-site infrastructure improvements for the Project as set forth in the Development Schedule as defined below in this Section 2.3. Notwithstanding the Development Schedule, the Parties acknowledge that Collaborative and its Members cannot at this time fully predict when or at what rate the Project Site will be developed. Such decisions depend upon numerous factors that are not within the control of the Collaborative and its Members, such as market orientation and demand, availability of financing, interest rates, absorption, competition and similar factors. Because the California Supreme Court held in Pardee Construction Co. v. City of Camarillo, 37 Cal.3d 465 (1984), that the failure of the parties therein to provide for the timing of development permitted a later adopted initiative restricting the timing of development and controlling the Parties' agreement, it is the intent of the Collaborative and the County to hereby acknowledge and provide for the right of the Collaborative and its members to develop the Project Site in such order and at such rate and times as they deem appropriate within the exercise of their sole and subjective business judgment. Notwithstanding these uncertainties, in order to preserve its development rights under this Agreement, the Development Schedule commits the Collaborative or its Members to build out the Project Site as follows: (a) the start of construction of one (1) Affordable Housing building within five (5) years of the Effective Date, (b) the start of construction of an additional two (2) Affordable Housing buildings within ten (10) years of the Effective Date; (c) the start of construction of the remaining two (2) Affordable Housing buildings within fifteen (15) years of the Effective Date; (d) start of construction of forty (40) percent of the final Wellness and Education Campus-related uses within ten (10) years of the Effective Date meaning final improvements on forty (40) percent of the total leasehold land area of the Wellness and Education Campus-related Ground Leases; (e) start of construction of fifty-five (55) percent of the final Wellness and Education Campus-related uses within twenty (20) years of the Effective Date on fifty-five (55) percent of the total leasehold land area of the Wellness and Education Campus-related Ground Leases, and (f) submission by the Collaborative to County of an application for the Street Vacation within seven (7) years of the Effective Date and clearance of all conditions to effectuate the Street Vacation within nine (9) years of the Effective Date. Together these aforementioned items (a) through (e) are collectively defined as the "**Development Schedule**." The Development Schedule provides for no more than two individual development areas under construction at any one time and the two individual development areas under construction would not be adjacent or adjoining the same existing offsite residential area. For the

purposes of this Section, construction shall be defined as demolition, grading, building construction, architectural coating, and paving activities. After the Effective Date, the Collaborative or any Member assigned rights under this Agreement may submit a written request to the Director to extend the timing of the Development Schedule. Upon a showing of good cause, the Director has authority to extend the Development Schedule timing for a period up to 365 days, which approval shall not be unreasonably withheld, conditioned, or delayed. A denial by the Director may be appealed to the Board of Supervisors. An extension to the Development Schedule by the Director, or the Board on appeal, shall be reflected in an Operating Memorandum described in Section 7.9.1. A request to extend the Development Schedule for more than 365 days can only be approved by the Board. Absent prior approval to extend the Development Schedule by the Director or the Board, failure to meet the Development Schedule, subject to Enforced Delay, may be considered an event of default subject to the Default Provisions in Section 7 of this Agreement.

2.4 Potential Shared Facilities.

The Parties agree that reciprocal easements or some other form of agreement for potential shared facilities among the Wellness and Education Campus and the Affordable Housing may be needed. A Reciprocal Easement Agreement or some other form of agreement will be provided as necessary for ingress, egress, utilities, and/or any shared facilities to include, as necessary, provisions for cost sharing. A Reciprocal Easement Agreement or some other form of agreement, if required pursuant to this section, shall be recorded prior to the issuance of the first building permit for the Project.

2.5 Project Design

2.5.1 Architectural Design and Consistency. Project buildings shall be designed to foster walkable, livable, and healthy environments that enhance the experience of residents, students, staff, faculty, visitors, the surrounding community, and the broader public. To achieve this goal, building design shall incorporate the following strategies: (1) equally consider all sides of a building through the use of high quality materials, massing, articulation, and scale recognizing and respecting existing and proposed surrounding context; (2) orient primary buildings entrances toward surrounding streets to engage the existing surrounding community, (3) incorporate landscaping features to soften the edge between buildings and surrounding pathways, sidewalks, and other public/private walkways; and (4) design all project buildings in a manner that makes it easy for users to walk and bike to and from project buildings to destinations inside and outside of project boundaries. In addition to the other requirements of this Agreement, each application submitted to the Department of Regional Planning for the review and approval of final building design pursuant to Section 3.3 shall be reviewed by the Director (or designee) for adherence to these strategies.

2.5.2 Project Sustainability Features. Each Project Component shall incorporate sustainable design features as further described in Exhibit E.

2.5.3 Fire Access Lanes. Fire access lanes shall be developed across the project site consistent with any and all requirements of the Los Angeles County Fire Department. Each project component is required to fully build any and all required fire access lanes to satisfy fire access requirements. Where a fire access lane serving a specific project component is located on

another lease parcel, either in whole or in part, the project component that requires the fire access lane shall develop the entire fire access lane, including the portions on other lease parcels, to ensure adequate access.

2.5.4 Residential Building A5 Common Open Space. The Willowbrook Transit-Oriented District Specific Plan requires residential projects to incorporate 50 square feet of common open space for at least 50% of the proposed units. If not provided within Building A5's lease area, the required common open space for Building A5 may be incorporated into the common open space areas associated with Buildings A1, A2, A3, and/or A4. If this occurs, the Collaborative shall record an access easement allowing residents of Building A5 to have access to the common open space areas of Buildings A1, A2, A3, and/or A4 in perpetuity. The allowed access shall be identical to that of a resident of Building A1, A2, A3, and A4 in accessing their on-site common open space.

2.6 Security. Upon the execution of a Ground Lease for the Wellness and Education Campus the applicable Member shall, at its sole cost and expense, implement the Security Plan for the entirety of the Project Site. The Members may agree to implement a Security Plan that encompasses multiple leaseholds consistent with Ground Lease obligations. During the Option Agreement period for the Affordable Housing, the Collaborative shall reimburse the District, or its designee, for the costs associated with fencing and related security measures, weed abatement and trash removal.

2.7 Maintenance; Final Improvements. Upon the execution of a Ground Lease for the Wellness and Education Campus and/or the Option Agreement, the applicable Member shall, at its sole cost and expense, maintain and operate the respective portion of the Project Site in full compliance with the Entitlements, Ground Lease, Reciprocal Easement Agreement, or other similar agreement if necessary, and any law, statute, ordinance, or other regulation applicable to any development or activity on the subject property. The Collaborative, or the applicable Member, shall maintain the Project Site in good repair and all structures, walls, and fences open to public view shall remain free of extraneous markings, drawings, or signage that do not directly relate to the activities being operated on the Project Site or that do not provide pertinent information about the Project Site and/or activities thereon.

2.8 Public Benefits.

2.8.1 Community Benefits. The Collaborative, and its Members as Assignees, shall each perform with respect to their respective leasehold interests the Community Benefits identified in Exhibit A to this Agreement.

2.8.2 Public Objectives. In accordance with the legislative findings set forth in section 65864 of the Development Agreement Act, County wishes to encourage certain public objectives that will be furthered by this Agreement, including the orderly development of the Project Site in accordance with Applicable Rules and the Project Approvals. This Agreement will reduce uncertainty in planning for and securing orderly development of the Project, facilitate installation of necessary improvements, encourage attainment of efficient resource utilization within the County and otherwise achieve the goals and purposes for which the Development Agreement Act was enacted. Additionally, although development in accordance with this

Agreement will restrain the County's land use and other relevant police powers to the extent expressly set forth herein, this Agreement will provide County with sufficient Reserved Powers during the Term hereof to remain responsible and accountable to its residents. In exchange for these and other benefits to the County (including the Community Benefits), the Collaborative and its Members will receive assurances that the Project may be developed during the Term of this Agreement in accordance with the Applicable Rules and the Entitlements. The Parties believe that such orderly development of the Project will provide many benefits to the Parties, including without limitation the following:

2.8.2.1. Comprehensive Planning Goals and Policies. The development of the Project pursuant to the Entitlements and this Agreement will facilitate the implementation of the Willowbrook TOD Specific Plan (a component of the General Plan), a copy of which is attached as Exhibit H, to promote the following planning goals and policies contained within the Willowbrook TOD Specific Plan, including the following:

(a) Encourage transit oriented development;

(b) Provide affordable housing opportunities;

(c) Provide a mix of land uses in the Mixed-Use Zones to accommodate employment, retail, and residential uses, as well as local serving amenities;

(d) Promote active transportation and reduce vehicle miles traveled;

(e) Improve the Quality of life for existing residents with improvements to the public realm;

(f) Promote housing affordability through diversification of housing choices;

(g) Improve economic vitality and employment opportunities.

(h) Facilitate the expansion of the CDU campus that is compatible and sensitive to surrounding neighborhoods.

(i) Provide a variety of housing choices within walking distance of the Willowbrook/Rosa Parks Metro Station.

(j) Require new development to provide public open space as a community benefit.

2.8.2.2. County Development Objectives. The public benefits to be received as a result of the development of the Project pursuant to this Agreement include the following, which are further detailed in Exhibit A:

(a) According to the RSG study dated February 23, 2023, development of the Wellness and Education Campus, a vital community asset within the County, is anticipated to provide approximately $295 million worth of

benefits to the Willowbrook community, including the creation of approximately 5,500 construction and 750 permanent jobs[1];

(b) Implementation of a well-planned job training and local hiring program to meet the community's goal of employing local and Los Angeles County residents in the construction of the Project, and for permanent jobs at the Wellness and Education Campus with participation from diverse minority, women, and veteran-owned business enterprises, and small businesses;

(c) Implementation of a Community Workforce Agreement at the Parking Structure as defined by the County's Community Workforce Agreement Policy as of the date of this agreement;

(d) Construction of no less than 220 and up to 254 deed-restricted Affordable Housing units set aside for 99-years and restricted to qualified residents whose incomes do not exceed 80 percent of the AMI to assist in meeting the affordable housing needs of the County as further described in Exhibit A;

(e) Development on an art program to provide Public Art as that term is defined in the County's Public Art in Private Development Requirement to satisfy the County's Public Art Requirement;

(f) Assurance that development of the Project will proceed in accordance with a coordinated master plan which was the result of a comprehensive and coordinated planning process by and among the Parties and the community in which private and public goals, objectives and interests were thoughtfully integrated and resolved in an optimal fashion.

3. OBLIGATIONS OF THE COUNTY

3.1 Entitlement to Develop. The Collaborative and its Members, as Assignees, shall have the vested right during the Term of this Agreement to develop and operate the Project in accordance with, and to the full extent allowed by, this Agreement, the Entitlements, and the Applicable Rules. The Parties acknowledge that future approvals such as the Ministerial Implementing Approvals will be required for development and implementation of the Project. The County shall process, consider, and act on any future application or other approvals needed to build the Project only in accordance with this Agreement, Applicable Rules, and any Future Rules that are made applicable to the Project or Project Site pursuant to Section 3.2, below. The County agrees that it is bound to permit the development and operation of the uses, density and intensity of such uses, the building heights, and the development standards and design guidelines provided for in this Agreement and the Entitlements, so long as this Agreement is in place.

This subsection to be updated once Community Benefits negotiated.

3.1.1 The County shall not require the Collaborative or any of its Members to obtain any approvals or permits for the development of the Project in accordance with this Agreement other than those permits or approvals that are required by the Entitlements, the Applicable Rules, and any Future Rules that are made applicable to the Project or Project Site pursuant to Section 4.1, below. All Entitlements and amendments to any Entitlements issued, adopted or approved by the County shall automatically vest for the term of the Agreement on the date such approval is effective with no further action required by the Collaborative.

3.1.2 Notwithstanding the previous paragraph of this Section 3.1, this Agreement does not: (a) grant density, intensity or uses in excess of that otherwise established in the Entitlements and the Applicable Rules; (b) supersede, nullify or amend any condition imposed in the Entitlements; (c) eliminate County discretion with respect to future discretionary actions; (d) guarantee that Parties will receive any profits from the Project; or (e) amend the County's General Plan or Willowbrook TOD Specific Plan beyond the Entitlements. The County retains its authority to modify the Willowbrook TOD Specific Plan and General Plan. Notwithstanding the foregoing, no such amendment or modification shall apply to, impair, delay, reduce, or otherwise adversely affect the development of the Project as approved under the Entitlements, or the vested rights granted to the Collaborative, its Members, successors, or permitted Assignees under this Agreement and Section 3.1. Any such amendments or modifications shall apply only prospectively to other properties or projects and shall not be interpreted or enforced in a manner that diminishes or interferes with the rights, approvals, or development standards applicable to the Project. The Parties understand this Agreement has a fixed Term and is not permanent.

3.2 Changes in Applicable Rules. County may adopt new or modified Rules, Regulations, and Official Policies after the Effective Date ("**Future Rules**"); provided, however, that such Future Rules shall be applicable to the Project or Project Site only to the extent that such application does not conflict with Entitlements or Applicable Rules and, as specified in Government Code Section 65866, such Future Rules shall not delay, modify, prevent, or impede development or operation of the Project on the Project Site or conflict with any of the vested rights granted to the Collaborative under this Agreement. Without limiting the generality of the foregoing and by way of example, any Future Rules shall be deemed to conflict with the Collaborative's vested rights if they seek to limit or reduce the types of uses allowed, the density or intensity of uses permitted, or the building heights allowed, or attempt to alter or modify the development standards or design guidelines, or to limit the timing of the development of the Project, either with specific reference to the Project Site or as part of a general enactment that applies to the Project Site. The Collaborative may, in its sole and absolute discretion, consent to the application to the Project of any Future Rules.

3.2.1 Notwithstanding the foregoing, the County shall not be precluded from applying any Future Rules to the Project or Project Site under the following circumstances where, and to the extent that, the Future Rules are: (1) mandated by changes in state or federal laws or regulations adopted after the Effective Date as provided in Government Code Section 65869.5 (but subject to the provisions of the following paragraph); (2) mandated by a court of competent jurisdiction as applicable to the Project or Project Site; (3) necessary to protect the public health and safety and are generally applicable on a Countywide basis; (4) an event of natural disasters as found by the Board of Supervisors such as floods, earthquakes, and similar acts of God which need not be applicable on a Countywide basis; or (5) a Reserved Power. In addition, all specifications,

standards, and policies regarding the design and construction of public works facilities, if any, shall be those that are in effect at the time the Project plans are being processed for approval and/or under construction, and the design and construction requirements for an individual action under the Project shall be governed by the California Building Standards Codes then in effect at the time such action is submitted for review and approval, except as otherwise specifically provided for in the Willowbrook TOD Specific Plan.

3.2.2 With respect to item "(1)" above in the preceding paragraph, such Future Rules described in "(1)" shall be implemented by County to minimally comply with such state or federal laws or regulations; provided, however, that this Agreement and the Entitlements shall remain in full force and effect to the extent not inconsistent with such state or federal laws or regulations and to the extent such state or federal laws or regulations do not render such remaining provisions impractical or impossible to enforce. Unless otherwise required by law, as determined in County's reasonable discretion (but subject to the meet and confer provisions of this paragraph), modifications to this Agreement and to the Project Approvals that may be required to address minimal compliance with state or federal laws or regulations pursuant to this Section 3.2 shall be implemented by the County as "minor" or "administrative" changes in accordance with Sections 3.2.8, 3.2.9 and 7.9.1 of this Agreement, so long as it meets the criteria set forth in County Code § 22.184.030.A. Upon discovery of a Future Rule described in "(1)" above, County shall provide the Collaborative with written notice of the Future Rule, and a written statement of the conflicts thereby raised with the provisions of Applicable Rules or this Agreement. The Parties shall thereafter meet and confer in a good faith attempt to modify this Agreement, as necessary, to minimally comply with such federal or state law or regulation. In implementing this paragraph, preservation of the terms of this Agreement and the rights of Parties as derived from this Agreement shall be the primary goal. If necessary to comply with federal or state law or regulations, County also agrees to process the Collaborative's proposed changes to the Project that are necessary to comply with such federal or state law or regulations ministerially consistent with the process set forth at County Code § 22.184.030, and that such proposed changes shall be conclusively deemed to be consistent with this Agreement without any further need for any amendment to this Agreement or any of its Exhibits.

3.2.3 This Agreement shall not be construed to prevent County from approving, conditionally approving, or denying any future application for entitlements on the basis of Applicable Rules or Future Rules.

3.2.4 Health and Safety Emergencies. In the event that a public health or safety emergency is declared by the County, State or Federal governments that impacts the Project, the County shall attempt, to the extent reasonably possible as determined by the County in its discretion, to address and resolve such emergency in a way that does not have a material adverse impact on the Project in accordance with the Entitlements and the Applicable Rules; however, if the County determines, in its discretion, that it is not reasonably possible to so address or resolve such health or safety emergency, then the County shall select that option for addressing the emergency which, in the County's discretion, but in consultation with the Collaborative minimizes, so far as reasonably possible, the impact on the Project in accordance with the Entitlements and the Applicable Rules while still addressing such health or safety emergency in a manner acceptable to the County. The County shall thereafter notify the Member of such manner of addressing the emergency.

3.2.5 Implementing Approvals. The County shall process, consider, and act promptly on any application for Implementing Approvals only in accordance with this Agreement and the Applicable Rules, along with any applicable Future Rules pursuant to Section 3.1, above. The Project has been approved at a master plan level, and the Collaborative shall submit subsequent applications to the Department of Regional Planning for the review and approval of each Project Component. The County shall not require the Collaborative to obtain any additional Entitlements to develop the Project unless required by the Existing Rules or any applicable Future Rules. Any Ministerial Implementing Approvals shall, upon approval by the County, be vested in the same manner as provided by this Section 3.2 of this Agreement.

3.2.6 Moratoria or Interim Control Ordinances. In the event an ordinance, resolution, policy, or other measure is enacted, whether by action of the County, by initiative, or otherwise, which relates directly or indirectly to the Project or to the rate, amount, timing, sequencing, or phasing of the development or construction of the Project on all or any part of the Project Site or the implementation of the Mitigation Measures applicable to the Project, such ordinance, resolution, or other measure shall not apply to the Project Site or this Agreement, unless such changes are adopted pursuant to Section 3.2.1, above.

3.2.7 Impact Fees. Collaborative or Assignee shall pay all Impact Fees that are in effect at the time an application is submitted for any Ministerial Implementing Approval, inclusive of increases in such fees as are generally applicable in the County, except to the extent the Affordable Housing or Collaborative are eligible for waivers of such fees, provided that such action or approval may lawfully be conditioned on the payment of Impact Fees.

3.2.8 Minor Modifications. The Parties agree that the Director may make minor modifications to the approved Entitlements, pursuant to the modification section of the County Code at Section 22.184.030. The Parties acknowledge and agree that the Director may approve modifications to the approved Project Site Plan, provided that the modifications (a) are consistent with the scope of the Project and the findings made in the County's original approval of the Project Site Plan; (b) comply with all existing conditions of approval for the Entitlements; (c) maintain the required number of vehicle parking spaces; and (d) comply with standards and regulations of the zone, unless specifically modified by the conditions of approval.

3.2.9 Minor Administrative Changes to Entitlements. Unless otherwise required by law, a "minor" or "administrative" change to the Entitlements shall not require an amendment to this Agreement pursuant to California Government Code section 65868. Unless otherwise required by law, a minor or administrative change in an Entitlement may be reflected in an Operating Memoranda as described in Section 7.9.1.

3.2.10 Processing Fees. Members shall pay all Processing Fees for the Entitlements, except those Processing Fees waived in accordance with Applicable Rules. Processing Fees shall be those in effect at the time an application is submitted for any Entitlement, except as otherwise provided in the Specific Plan.

3.2.11 Development Agreement/Entitlement Inconsistencies. If there is an inconsistency between any Applicable Rules and an Entitlement, then the provisions of the Entitlement shall control and govern the Parties' actions. If there is an inconsistency between any

Applicable Rules, Future Rules, or Entitlement, and this Agreement, then the provisions of this Agreement shall control and govern the Parties' actions.

4. INCORPORATION AND ANNEXATION

4.1 Intent. If all or any portion of the Project Site is annexed to or otherwise becomes a part of a city or of another county, it is the intent of the Parties that this Agreement shall survive and be binding on such other jurisdiction.

4.2 Incorporation. If at any time during the Term of this Agreement, a city is incorporated comprising all or any portion of the Project Site, the validity and effect of this Agreement shall be governed by Section 65865.3 of the California Government Code.

5. ANNUAL REVIEW

5.1 Annual Review. Review of the Collaborative and its Members' good faith compliance with the terms of this Agreement during the period under review shall take place on an annual basis beginning twelve (12) months after the Effective Date of this Agreement and continuing to occur annually thereafter on or shortly following the yearly anniversary of the Effective Date ("**Annual Review**") until termination of the Agreement. The Annual Review shall be conducted in accordance with the Development Agreement Act and the Development Agreement Ordinance, and shall address all items set forth therein as well as specifically demonstrate the Collaborative and its Members' compliance during the period under review with its obligations under Section 2 above, this Agreement as a whole, and the MMRP. Upon written request by the County to the Collaborative, the Collaborative shall submit evidence of its and its Members' compliance with this Agreement and the MMRP during the period under review in a form that the Director may reasonably establish, in writing, and transmitted to the Director no later than sixty (60) days from the Director's commencement of the Annual Review. The Collaborative shall make an initial deposit within sixty (60) days of the Effective Date with the Department of Regional Planning in the amount of $5,000.00 from which the actual costs and expenses of conducting the Annual Review shall be billed and deducted for the purpose of defraying the costs or expenses involved with the required review for compliance with this Development Agreement. The Department of Regional Planning will provide to the Collaborative, on an annual basis, if requested, an accounting of actual costs and expenses associated with the deposited funds. If, during the course of the life of the Development Agreement, actual costs or expenses incurred reach 80 percent of the amount on deposit, the Collaborative shall deposit additional funds sufficient to bring the balance up to the amount of $5,000.00. There is no limit to the number of supplemental deposits that may be required during the life of the Development Agreement. At the sole discretion of the Collaborative, the amount of an initial or any supplemental deposit may exceed the minimum amounts defined herein. Upon completion of the term of the Development Agreement, any remaining funds will be returned to the Collaborative.

5.2 Certificate of Development Agreement Compliance. If, at the conclusion of an Annual Review, the Collaborative and its Members or Assignees are found to be in good faith compliance with this Agreement, County shall, within 30-days of written request by the Collaborative, issue a Certificate of Development Agreement Compliance ("**Compliance Certificate**") to the Collaborative stating that, after the most recent Annual Review and based

upon the information then known to the County, (1) this Agreement remains in effect and (2) the Collaborative and its Members or Assignees are, to the current actual knowledge of the County, in good faith compliance with the Agreement as required by section 65865.1 of the Development Agreement Act. The Compliance Certificate shall be in the form attached hereto as Exhibit I. The Collaborative may record the Compliance Certificate with the County Recorder. Additionally, any Party may at any time request from the other an estoppel certificate ("**Estoppel Certificate**") confirming, in addition to the foregoing, (a) that this Agreement is unmodified and in full force and effect, or if there have been modifications hereto, that this Agreement is in full force and effect as modified and stating the date and nature of such modifications; (b) that there are no known current uncured defaults under this Agreement or specifying the dates and nature of any such known default; and (c) as to any other reasonable information requested. The Estoppel Certificate shall in the form attached hereto as Exhibit J. Any such Compliance Certificate or Estoppel Certificate delivered pursuant to this Section 5.2 shall not estop the Party delivering such certificate from asserting a breach or default, or pursuing any rights arising therefrom, with respect to any matter which occurs subsequent to the date of such certificate or discovered thereafter.

5.3 Failure of Annual Review. County's failure to conduct a review at least annually of compliance with the terms and conditions of this Agreement shall not constitute or be construed by County or the Property Owners as a breach of or a default under this Agreement, and will not constitute a waiver of County's right to conduct such review at a later date.

5.4 Cooperation with Lenders and Investors. The County and District shall cooperate in good faith with the Affordable Member Partnership, or any Assignee under Section 7.10, and their respective lenders and Tax Credit Investors in connection with financing of any Phase of the Project. This cooperation includes, without limitation, the execution of estoppel certificates, certifications, subordination agreements, recognition agreements, consents to collateral assignments, and similar documents customarily required in connection with affordable housing financing transactions, provided that such documents do not materially alter the County's or District's substantive rights or obligations under this Agreement. The County and District agree to respond to such requests within fifteen (15) business days of receipt of a written request.

6. DEFAULT PROVISIONS

6.1 General Default Provisions

6.1.1 Default. Failure or unreasonable delay by any Party to perform any material provision of this Agreement shall constitute a default under this Agreement, except as expressly provided otherwise pursuant to this Agreement.

6.1.2 Notice of Default. In the event of a default, the Party alleging such default shall give the defaulting Party timely written notice of default ("**Notice of Default**"). County shall always notice a non-defaulting Party at the same time and in the same manner as a defaulting Party. Failure or delay in giving a Notice of Default shall not waive a Party's right to give future notice of any other default. The Notice of Default shall specify the nature of the alleged default and the manner in which such default may be satisfactorily cured.

6.1.3 Cure Period. The defaulting Party shall provide evidence that it was never, in fact, in default or shall promptly commence to cure the identified default within thirty (30) days of the Notice of Default, unless the Parties extend such time by mutual written consent or except in cases in which a Party's alleged default presents a threat of imminent harm to the public. If the nature of the alleged default is such that it cannot be reasonably cured within such 30-day period, the commencement of the cure within such time period and the diligent pursuit to completion of the cure shall be deemed a cure within such period. During any period of curing, the Party charged shall not be considered in default for purposes of terminating this Agreement, for the purpose of determining compliance pursuant to an Annual Review under Section 5.1, or instituting legal proceedings pursuant to this Agreement. County agrees that any non-defaulting Member or Assignee (or any of their respective Mortgagees or Tax Credit Investors), in such party's sole and absolute discretion and without imposing any obligation, may cure or remedy any default or the other defaulting Member.

6.2 Remedies for Default.

6.2.1 Collaborative Default; County Remedies. If the Collaborative or any of its Members as Assignees remains in default after the cure period, subject to satisfaction of the dispute resolution provisions of Section 7.6 of this Agreement, the County shall have all rights and remedies provided by this Agreement, including, without limitation, the right to terminate or modify this Agreement, as it pertains to the defaulting Party, subject to the provisions set forth in Section 6.3 below Termination or Cancellation of Agreement. If the Director finds and determines that a Party remains in default after the cure period, subject to satisfaction of the dispute resolution provisions of Section 7.6 of this Agreement, and if the County intends to terminate or modify this Agreement, the Director shall notify the Regional Planning Commission that the Agreement is being violated, and a public hearing shall be scheduled before the Regional Planning Commission in accordance with the provisions of the Development Agreement Ordinance (County Code Sections 22.162.120, 22.162.130.A, and 22.162.130.B). If after such public hearing, the Regional Planning Commission finds that the Party is in violation of this Agreement, the Regional Planning Commission shall notify the Board of Supervisors of its findings and recommend such action as it deems appropriate. If the Regional Planning Commission reports a violation of the Development Agreement to the Board of Supervisors pursuant to this Section 6.2.1, the Board of Supervisors may take one of the following actions: (a) approve the recommendation of the Regional Planning Commission instructing that action be taken as indicated therein in cases other than a recommendation to terminate or modify the Agreement; (b) refer the matter back to the Regional Planning Commission for further proceedings with or without instructions; or (c) schedule the matter for hearing before the Board of Supervisors if termination or modification of the Agreement is recommended. Procedures for such hearing before the Board of Supervisors shall be the same as provided in Section 22.162.110 of the Development Agreement Ordinance. There shall be no termination or modifications of this Agreement unless the Board of Supervisors acts pursuant to the provisions set forth in the Development Agreement Act (Government Code Sections 65865.1) and the Development Agreement Ordinance. Pursuant to Section 65865.1 of the Development Agreement Act, if, as a result of the Annual Review, the County determines, on the basis of substantial evidence, that a Party has not complied in good faith with terms or conditions of this Agreement, the County may terminate or modify the Agreement; provided, however, that if the Party does not agree to the modification, the County's only remedy shall be to terminate the Agreement, but only as to such Party. Further, if the County seeks to terminate or modify the

Agreement for any other reason, such action shall be subject to the requirements of Government Code Section 65868, including the requirement for the mutual consent of the Parties. Notwithstanding a University default for failure to commence development of the Wellness and Education Campus in accordance with the Development Schedule and potential termination of its rights under the DA, such default will not be grounds for termination of the Option.

6.2.2 County Default; Collaborative Remedies. If the County remains in default after the cure period, and subject to satisfaction of the dispute resolution provisions of Section 7.6 of this Agreement, the Collaborative shall have all rights and remedies provided by this Agreement. The Collaborative has the right to initiate amendment or cancellation of this Agreement subject to the provisions set forth in the Development Agreement Act and Development Agreement Ordinance, which include, but are not limited to, the requirement for mutual consent of the Parties to the amendment or cancellation. In the event County materially defaults under the terms of this Agreement, County agrees that the Collaborative shall not be obligated to proceed with or complete any Phase of the Project materially and directly affected by the default, nor shall resulting delays in the Collaborative's or its individual Members' performance constitute grounds for modification or termination of this Agreement.

6.2.3 No Monetary Damages. The Parties acknowledge that neither the County nor the Collaborative would have entered into this Agreement if such Party were liable in monetary damages under or with respect to this Agreement or the application thereof. Therefore, the Parties agree that the Parties shall not be liable for monetary damages (including but not limited to any consequential, special, or punitive damages) and the Parties covenant not to sue for or claim any monetary damages for the breach of any provision of this Agreement. Limitations on Default. Notwithstanding any provision in this Agreement to the contrary, after assignment of development rights and obligations to a Member or its successor for development of a particular Ground Lease area, default by such Member shall be attributable to it only and no other Party. For the avoidance of doubt, each Ground Lease and assigned portion of the Project (including, without limitation, the Wellness Campus, Education Campus, and any Affordable Housing Parcels) shall operate independently with respect to default and enforcement under this Agreement. A default by one Member or its affiliate shall not constitute a default by any other Member, nor shall it impair the rights of other Member to continue development or obtain approvals for their respective portions of the Project. The County retains the right to terminate this Agreement with respect to any Member that is in default of its obligations under this Agreement.

6.3 Termination or Cancellation of the Agreement. In addition to the procedures set forth in Section 6.2, this Agreement is also subject to the following termination provisions:

6.3.1 Termination Upon Expiration of Term. This Agreement shall terminate upon expiration of the Term set forth in Section 7.2. Upon termination of this Agreement, a notice of such termination in a form satisfactory to the County shall be duly recorded by the County in the Los Angeles County Official Records.

6.3.2 Cancellation by Mutual Consent. This Agreement may be cancelled by mutual consent of the Parties, subject to the procedures set forth in the Development Agreement Act and the Development Agreement Ordinance.

6.4 Enforced Delay; Extension of Time of Performance. In addition to specific provisions of this Agreement, performance by any Party hereunder shall not be deemed to be in default where a delay or failure to perform are due to any cause that is not the fault, or beyond the reasonable control, of such Party, including to the extent applicable, the following: war, insurrection, strikes, walkouts, lockouts, riots, floods, earthquakes, fires, casualties, acts of God, acts of public enemy, epidemics, quarantines, restrictions, freight embargos, lack of transportation, governmental restrictions or priority, unusually severe weather, acts of the other Parties, third-party litigation, restrictions imposed or mandated by governmental entities other than the County, enactment of conflicting state or federal laws or regulations, judicial decisions, or any other causes beyond the reasonable control or without the fault of the Party to be excused, and the cause of the enforced delay actually prevents or unreasonably interferes with such Party's ability to comply with this Agreement ("**Enforced Delay**"); provided, however, that the Parties agree that a delay that results solely from unforeseen economic circumstances shall not constitute an Enforced Delay for purposes of this Section 6.4. This Section 6.4 shall not be applicable to any proceedings with respect to bankruptcy or receivership initiated by or on behalf of the Collaborative or any of its individual Members, or by any third parties against the Collaborative or any of its individual Members if such third-party proceedings are not dismissed within ninety (90) days. If written notice of an Enforced Delay is given to either Party within forty-five (45) days of the commencement of such Enforced Delay, an extension of time for such cause will be granted in writing for the period of the Enforced Delay, or longer as may be mutually agreed upon. Litigation, as defined in Section 1.49, shall be deemed to create an Enforced Delay under this Section 6.4 only as to the Collaborative and any of its individual Members.

7. GENERAL PROVISIONS

7.1 Effective Date. The Effective Date of this Agreement shall be the date on which the Agreement is fully executed or, if litigation ensues, the date of the final adjudication upholding the Agreement.

7.2 Term. The term of this Agreement (the "**Term**") shall commence on the Effective Date and shall extend for a period of thirty (30) years after the Effective Date, unless the Term is earlier terminated or extended pursuant to this Agreement, or by mutual consent of the Parties. Upon the expiration of the Term, this Agreement shall terminate and be of no further force and effect; provided, however, any termination of this Agreement shall not affect any right or duty arising from entitlements or approvals, including the Entitlements, approved concurrently with, or subsequent to, the Effective Date of this Agreement. Notwithstanding the foregoing and in addition to any other provision in this Agreement, if any person or entity other than the Collaborative or any of its individual Members initiates litigation that challenges the Project, the Entitlements, or this Agreement, then the Collaborative will have the right to toll commencement of the Term while such litigation is pending. The tolling shall commence upon receipt by the County of written notice from any the Collaborative invoking its right to tolling. The tolling shall terminate when (1) a final order is issued in said litigation that upholds the Project and the Entitlements or (2) the litigation is dismissed with prejudice as to all parties; whichever occurs first.

7.3 Incorporation of Preamble, Recitals, and Exhibits. The preamble paragraph, Recitals, and Exhibits, and all defined terms contained therein, are incorporated fully herein.

7.4 Consistency with General Plan and Applicable Rules. The County hereby finds and determines that execution of this Agreement is in the best interest of the public health, safety, and general welfare, and the provisions of this Agreement are consistent with the General Plan. Based upon all information made available to the County up to or concurrently with the execution of this Agreement, the County finds that no Applicable Rules prohibit or prevent the full completion and occupancy of the Project in accordance with the uses, intensities, densities, designs and heights, permitted demolition, and other development entitlements incorporated and agreed to herein and in the Entitlements.

7.5 Enforceability of Agreement. The Parties agree that unless this Agreement is amended to provide otherwise or terminated pursuant to the provisions of this Agreement, this Agreement shall be enforceable by any of the Parties hereto.

7.6 Dispute Resolution. In addition to, and not by way of limitation of, all other remedies available to the Parties under the terms of this Agreement, the Parties shall first use the dispute resolution process in this Section 7.6 to resolve disputes related to the interpretation or enforcement of, or compliance with, the provision of this Agreement ("**Disputes**") prior to seeking any other remedy; provided that with respect to injunctive or other equitable relief for which a defense of timeliness to prosecute could be asserted, the Parties agree the parties agree to meet and confer with the Director, Director of Economic Opportunity and the Member with whom the dispute lies.

7.6.1 Informal Dispute Resolution. If any Party believes that a dispute exists in connection with whether another Party has breached or otherwise failed to perform an obligation required by this Agreement, then the aggrieved Party shall first attempt to promptly resolve the dispute through informal communications with the other Party's designated points of contact. If such efforts fail, the aggrieved Party shall promptly provide the other Party with written notice of the dispute and allow the other Party thirty (30) days to cure the dispute. Each party shall bear its own costs and expenses in connection with the use of informal dispute resolution.

7.7 Legal Action. Subject to the limitations on remedies imposed by this Agreement, either Party may, in addition to any other rights or remedies, institute legal action in any court with the venue to be in Los Angeles, to cure, correct, or remedy any default, enforce any covenant or agreement herein, or enjoin any threatened or attempted violation. In the event of any legal action between County and a Member or Collaborative seeking enforcement of any of the terms and conditions of this Agreement, the prevailing Party in such action shall be awarded, in addition to such relief to which the Party is entitled under this Agreement, at law or in equity, its reasonable litigation costs and expenses, including without limitation its expert witness fees and reasonable attorneys' fees. There shall be no liability to the Collaborative or its Members if the Project fails to occur.

7.8 Applicable Law. This Agreement shall be construed and enforced in accordance with the laws of the State of California.

7.9 Amendment. This Agreement may be amended by mutual consent in writing of the Parties to this Agreement in accordance with the provisions of the Development Agreement Act (Government Code Section 65868) and the Development Agreement Ordinance. Any amendment

to this Agreement that relates to the Term, permitted uses, density or intensity of use, height, or size of buildings, provisions for reservation and dedication of land, conditions, restrictions, and requirements or any conditions or covenants relating to the use of the Project Site, which are not provided for under the Entitlements, shall require notice and public hearing before the Parties may execute an amendment thereto.

7.9.1 Operating Memoranda. The provisions of this Agreement require a close degree of cooperation and flexibility between the County and the Collaborative and its individual Members. The development of the Project Site may demonstrate that clarifications or modifications to this Agreement, the Applicable Rules and Future Rules are appropriate with respect to the details of performance of the County and the Collaborative and its individual Members. To the extent allowed by law, the Collaborative and its individual Members retain flexibility as provided herein with respect to all matters, items and provisions covered in general under this Agreement. When and if the Collaborative and/or any of its individual Members finds it necessary or appropriate to make changes, adjustments or clarifications to matters, the Parties shall effectuate such changes, adjustments or clarifications through operating memoranda ("**Operating Memoranda**") approved by the Parties in writing with reference to this Section 7.9.1 substantially in the form attached as Exhibit K. Operating Memoranda are not intended to constitute an amendment to this Agreement but mere ministerial clarifications; therefore, public notice and hearings shall not be required. An Operating Memorandum may be used and thus deemed non-substantive and/or procedural if it does not result in material change in Fees, cost, an increase in the density or intensity of use, permitted uses, an increase in maximum height and size of buildings, a decrease in the amount of land to be dedicated for public purposes (including without limitation Community Benefits), or the reduction of improvement or construction standards and specifications for the Project. County Counsel shall be authorized, upon consultation with and approval of the Collaborative and its individual Members to determine whether a requested clarification may be effectuated pursuant to this Section 7.9.1 or whether the requested clarification is of such a character to constitute an amendment to this Agreement which requires compliance with the provisions of Section 7.9. The Planning Director of the County is authorized to make clarifications, in consultation with County Counsel, on behalf of the County.

7.10 Assignment. The Parties acknowledge that each Member of the Collaborative will be responsible to cause development of individual program components of the overall Project Site pursuant to and in accordance with the terms and conditions set forth in the Ground Leases. The Collaborative or any Member (an "**Assignor**") shall have the right to sell, encumber, convey, assign, or otherwise transfer, partially or wholly, directly or indirectly, its rights, interests, and obligations contained in this Agreement (an "**Assignment**") to any Member or their successors (each, an "**Assignee**") at any time during the Term of this Agreement; provided, however, that except with respect to Exempt Transfers set forth in Section 7.10.4, such Assignor shall first obtain the written consent of the County. Such consent shall not be unreasonably delayed, withheld or conditioned and must be granted upon demonstration by the Assignor, to the reasonable satisfaction of the Chief Executive Officer of the County, that the Assignee (or any guarantor or surety of the Assignee's performance that may reasonably be required by the County to ensure that any transferred obligations can be performed) has the financial ability to meet the obligations proposed to be assigned and to undertake and complete the portion of the Project affected by such Assignment, and, further, that the proposed Assignee (or any guarantor or surety of the Assignee) has adequate experience with developments of comparable scope and complexity and has

successfully completed such developments. Upon any such Assignment, the Assignee shall expressly and unconditionally assume all obligations of Assignor under this Agreement, and shall be liable for the performance thereof after the date of the Assignment, solely with respect to the portion of the Project Site so transferred and, provided Assignee has expressly agreed to assume all such obligations and liabilities, the Assignor shall be relieved of its legal duty with respect to such assigned obligations and liabilities. To the extent necessary to ensure obligations related to long term operational needs that may be common across all Wellness and Education Campus and Affordable Housing leaseholds and developments, the Members or their Assignees may participate in a new long-term Reciprocal Easement Agreement or other similar agreement to accomplish these objectives. Any request for County consent to an Assignment shall be in writing and accompanied by certified financial statements (or other financial documentation reasonably acceptable to the County) of the proposed Assignee and any additional information concerning the identity, financial condition and experience of the Assignee as the County may reasonably request; provided, that, any such request for additional information by the County shall be made, if at all, within twenty-one (21) days after County's receipt of the request for approval of the proposed Assignment. If County wishes to not give its consent to the requested Assignment, then County shall set forth in writing and in reasonable detail the grounds for such disapproval. If the County fails to provide consent or otherwise disapprove of a proposed Assignment within thirty (30) days after written request for such consent is given in the manner set forth in Section 7.15 and delivery of any required and requested additional information described above, such proposed Assignment shall be deemed to be consented to by County. Any attempted Assignment in violation of this provision shall be void *ab initio*, and shall constitute a breach of this Agreement. All Assignees that wish to engage in further Assignment shall also be bound by the terms of this Section 7.10 and each successive Assignment of the rights hereunder shall also be subject to the requirements of this Section 7.10. Upon a valid Assignment under this Section 7.10, the Assignee shall be entitled to enforce the rights and vested entitlements granted herein. All rights properly assigned under this Agreement pursuant to this Section 7.10 shall be deemed vested with the Assignee, and shall continue to apply for so long as the Assignee owns or leases the applicable parcel, regardless of the expiration or termination of this Agreement.

7.10.1 Assignment and Assumption Agreement. Any Assignment pursuant to Section 7.10 shall be evidenced by a written assignment and assumption agreement (an "**Assignment Agreement**") executed by Assignor and Assignee and recorded in the Los Angeles County Official Records. A copy of the executed Assignment Agreement shall be provided to the County.

7.10.2 County Consent – Delegation to Chief Executive Officer. Any consent required of the County under this Section 7.10 may be provided by the Chief Executive Officer and the Chief Executive Officer is hereby delegated the authority to provide such consent; provided that nothing herein shall require the Chief Executive Officer to make material changes to the Agreement or act prior to submission of such matter to the Board of Supervisors if the Chief Executive Officer considers that review necessary or helpful in the Chief Executive Officer's sole discretion. Any such submission of the Chief Executive Officer to the Board of Supervisors shall not extend the thirty (30) day period to disapprove the Assignment set forth in this Section 7.10.

7.10.3 Obligations Not Transferred Absent Assignment; Meet and Confer for Obligations Assigned. Unless otherwise transferred to an Assignee pursuant to an Assignment, all

obligations in this Agreement (including without limitation the obligations to provide Community Benefits) shall remain obligations of the Collaborative. Upon the request of any Party, the Parties shall expeditiously meet and confer in a reasonable effort to determine and reach resolution on whether a particular obligation under this Agreement that is proposed to be transferred to an Assignee should be treated as non-severable (i.e., not transferable by Assignment).

7.10.4 Exempt Transfers. Notwithstanding the foregoing or anything to the contrary in this Agreement, Assignor shall provide County with prior written notice (and a complete disclosure of the identity of the assignee or transferee), but County consent shall not be required for (1) the assignment, transfer or conveyance by either the Collaborative or any Member of such Parties rights, title, and interest in and to this Agreement to an Affiliate of any Member, including without limitation an Affordable Member Partnership, (2) the transfer of a Member's (or the Controlling Entity's [defined below]) shares, partnership interests, or other equity interests sold in the over-the-counter market or on other recognized stock exchange, or (3) a transfer creating a security financing interest, or any transfer or sale pursuant to such a security instrument, or (4) any grant of easements or permits to facilitate the development of the Project (collectively, "**Exempt Transfers**"). As used in this Section 7.10, the term "**Affiliate**" means any entity controlling ("**Controlling Entity**"), controlled by or under common control or management of, or with, a Member, or any entity which a Member or a Member's Controlling Entity, directly or indirectly, through one or more intermediaries, is a partner, shareholder, member, beneficiary or otherwise an owner. Exempt Transfers shall be evidenced by an Assignment Agreement and/or other written instrument, as applicable, a copy of which shall be provided to the County within forty-five (45) days of such transfer.

7.11 Covenants. It is intended and determined that the provisions of this Agreement shall constitute covenants that shall run with the land comprising the Project Site for the benefit thereof, and the burdens and benefits hereof shall bind and inure to the benefit of all assignees, transferees, and successors to the Parties hereto.

7.12 Cooperation and Implementation.

7.12.1 Processing. Upon satisfactory completion by the Collaborative of all required preliminary actions and payment of appropriate Processing Fees, the County shall commence and diligently process all required steps necessary for the implementation of this Agreement and development of the Project Site in accordance with the terms of this Agreement. The Collaborative shall, in a timely manner, provide the County with all documents, plans, fees, and other information necessary for the County to carry out its processing obligations pursuant to this Agreement.

7.12.2 Other Governmental Permits. The Collaborative or Assignee shall, subject to the exercise of sole business judgement and taking into account market and economic considerations, process such other permits and approvals as may be required from other governmental or quasi-governmental agencies having jurisdiction over the Project as may be required for the development of, or provision of services to, the Project. The County shall cooperate with the Collaborative or Assignee in its endeavors to obtain such permits and approvals and shall, from time to time at the request of the Collaborative, attempt with due diligence and in good faith to enter into binding agreements with any such entity to ensure the availability of such

permits and approvals, or services, provided such agreements are reasonable and not detrimental to the County, as determined by the County. These agreements may include, but are not limited to, joint powers agreements under the provisions of the Joint Exercise of Powers Act (Government Code Section 6500, *et seq.*), Mello Roos or community facilities districts, creation of geologic hazard abatement districts, LAFCO's approval of annexation or detachment, or agreements entered into pursuant to the provisions of other laws to create legally binding, enforceable agreements between such parties. To the extent allowed by law, the Collaborative shall be a party to any such agreement, or a third party beneficiary thereof, entitled to enforce for its own benefit on behalf of the County, or in its own names, the rights of the County or Collaborative thereunder or the duties and obligations of the parties thereto. The Collaborative shall reimburse the County for all costs and expenses incurred in connection with seeking and entering into any such agreement provided that Collaborative has requested such agreement. The Collaborative shall defend the County in any challenge by any person to any such agreement, and shall reimburse the County for any costs and expenses incurred by the County in enforcing such agreement. Any fees, assessments, or other amounts payable by the County thereunder shall be borne by Collaborative except where Collaborative has notified the County in writing, prior to the County's entering into such agreement, that Collaborative does not desire for the County to execute such agreement.

7.12.3 Cooperation in the Event of Legal Challenge. In the event of any legal action instituted by a third party or other governmental entity or official challenging the validity of any provision of this Agreement, the Parties hereby agree to cooperate in defending such action.

7.13 Relationship of the Parties; Project is a Private Undertaking. The only relationship between County and Collaborative is that of a government entity regulating the development of private property and the owner of a portion of such property. It is understood and agreed by the Parties hereto that the Project is a private development. Further, the County and Collaborative hereby renounce the existence of any form of joint venture or partnership between them and agree that nothing herein or in any document executed in connection herewith shall be construed as making the County and Collaborative joint venturers or partners. County agrees that by its approval of, and entering into, this Agreement County is not taking any action that would transform this private Project into a "public work" project, and that nothing in this Agreement shall be interpreted to convey upon Collaborative any benefit that would transform the Collaborative's private Project into a public work project, it being understood that this Agreement is entered into by County and Collaborative upon the exchange of consideration described in this Agreement, including the recitals of this Agreement which are incorporated into this Agreement and made a part hereof, and that County is receiving by and through this Agreement, the full measure of benefit in exchange for the burdens placed on the Collaborative by this Agreement, including but not limited to Collaborative's obligation to provide the Community Benefits set forth herein.

7.14 Hold Harmless. The Collaborative shall defend, indemnify, and hold harmless the County, its elected and appointed officers, employees, and agents, from any claim, action, or proceeding against the County or its agents, officers, or employees to attack, set aside, void, or annul any approvals associated with the Project, including but not limited to, any action raised pursuant to the Government Code, the California Environmental Quality Act (CEQA), the Public Records Act related to document requests associated with the Project, or other federal, state, or local law. The County may, at its sole discretion, participate at its own expense in the defense of

Exhibit I

such actions. The County shall promptly notify Collaborative of any claim, action, or proceeding and the County shall reasonably cooperate in the defense.

7.14.1 In the event that any claim, action, or proceeding as described above is filed against the County, the Collaborative shall within ten days of the filing make an initial deposit with Regional Planning in the amount of up to $50,000.00, from which actual costs and expenses shall be billed and deducted for the purpose of defraying the costs or expenses involved in Regional Planning's cooperation in the defense, including but not limited to, depositions, testimony, and other assistance provided to Collaborative or their counsel.

7.14.2 If during the litigation process, actual costs or expenses incurred reach 80 percent of the amount on deposit, the Collaborative shall deposit additional funds sufficient to bring the balance up to the amount of $50,000.00. There is no limit to the number of supplemental deposits that may be required prior to completion of the litigation.

7.14.3 At the sole discretion of the Collaborative, the amount of an initial or any supplemental deposit may exceed the minimum amounts defined herein. Additionally, the cost for collection and duplication of records and other related documents shall be paid by the Collaborative according to County Code Section 2.170.010.

7.15 Notices. All notices shall be in writing and either (a) personally served at the appropriate address (including by means of professional messenger service or recognized overnight delivery service, provided that any such delivery is confirmed by written receipts signed on behalf of the receiving Party or by adequate proof of service) or (b) deposited in the United States mail, postage prepaid, certified or registered mail, return receipt requested, addressed to the appropriate addressee and shall be deemed received and effective on the day such notice is actually received if received before 5:00 p.m. on a regular Business Day, or on the following Business Day if received at any other time. All addresses of the Parties for receipt of any notice to be given pursuant to this Agreement are designated below. Either Party hereto may at any time, by giving ten (10) days' written notice to the other Party hereto, provide additional persons or addresses or designate any other person or address in substitution of the person or address to whom or to which such notice or communication shall be given.

If to the County:

Director of Regional Planning
Attention: Amy J. Bodek, AICP
County of Los Angeles Department of Regional Planning
320 West Temple Street, 13th Floor
Los Angeles, CA 90012

with copies to:

Director of Public Works
Attention: Mark Pestrella
County of Los Angeles Department of Public Works
900 South Fremont Avenue
Alhambra, CA 91803

County Counsel
Attention: [name]
Office of the County Counsel
County of Los Angeles

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500 West Temple Street, 6th Floor
Los Angeles, CA 90012

Director of Economic Opportunity
Attention: Kelly LoBianco

County Executive Office
Attention: Joyce Chang

If to Collaborative:

Carl A. McLaney, MPA
Vice President of Administration and Infrastructure
Charles R. Drew University of Medicine and Science
1731 E. 120th Street
Los Angeles, CA 90059

Latham & Watkins LLP
355 S. Grand Avenue, Suite 100
Los Angeles, CA 90071
Attn: Kim Boras

Century Housing

Century Affordable Development, Inc.
1000 Corporate Points
Culver City, CA 90230
Attention: President

With copy to:

Bocarsly Emden Cowan Esmail & Arndt LLP
633 West 5th St, Suite 5880
Los Angeles, CA 90071
Attn: Nicole Deddens, Esq.

If to the District:

501 S. Santa Fe Avenue
Compton, CA 90220
Attention: Darin Brawley, Ed.D
Superintendent of the District

With a copy to:

Orbach Huff Suarez & Henderson LLP
1901 Avenue of the Stars, Suite 575
Los Angeles, California 90067
Attn: Sarine A. Abrahamian, Esq.

7.16 Recordation. As provided in Government Code Section 65868.5, the Executive Officer-Clerk of the Board of Supervisors ("**Executive Officer**") of the County shall record a copy of this Agreement with the Registrar-Recorder/County Clerk of the County of Los Angeles within ten (10) days following the execution of this Agreement. Collaborative shall provide the Executive Officer with the fees for such recording should the Executive Officer effectuate the recordation.

7.17 Constructive Notice and Acceptance. Every person who now or hereafter owns or acquires any right, title, interest in or to any portion of the Project Site, is and shall be conclusively deemed to have consented and agreed to every provision contained herein, whether or not any reference to this Agreement is contained in the instrument by which such person acquired an interest in the Project Site.

7.18 Successors and Assignees. The provisions of this Agreement shall be binding upon and shall inure to the benefit of the Parties, any subsequent owner of all or any portion of the Project Site and their respective successors, transferees, and assignees.

7.19 Severability. If any term, provision, condition, or covenant of this Agreement, other than those set forth in Sections 2.1 and 3 above and in Exhibit A to this Agreement, is held by a court of competent jurisdiction to be invalid, void, or unenforceable, the remaining provisions, conditions, and covenants of this Agreement shall continue in full force and effect.

7.20 Time of the Essence. Time is of the essence for each provision of this Agreement of which time is an element.

7.21 Waiver. No waiver of any provision of this Agreement shall be effective unless such waiver is in writing and signed by a duly authorized representative of the Party against whom enforcement of a waiver is sought and refers expressly to this Section 7.21. No waiver by any Party of any provisions of this Agreement shall be considered a waiver of any other provision or any subsequent breach of the same or any other provision, including the time for performance of any such provision. The exercise of any right or remedy provided in this Agreement or provided by law shall not prevent the exercise by that Party of any other right or remedy provided in this Agreement or under the law.

7.22 No Third Party Beneficiaries. The only Parties to this Agreement are the County and Collaborative, and their respective successors in interest. There are no third party beneficiaries and this Agreement is not intended, and shall not be construed to benefit or be enforceable by any other person whatsoever.

7.23 Entire Agreement. This Agreement, inclusive of the preamble paragraph, Recitals, and Exhibits, constitutes the entire understanding and agreement between the Parties, and supersedes all other agreements, oral or written, with respect to the subject matter herein. This Agreement may not be amended except in writing signed by all of the Parties.

7.24 Construction of Agreement. Each Party acknowledges that it has received independent legal advice from its attorneys with respect to the advisability of executing this Agreement and the meaning of the provisions hereof. The provisions of this Agreement and the attached Exhibits shall be construed as a whole according to their fair and common meaning, in a manner that shall achieve the purposes of this Agreement, and not strictly for or against any Party based upon any attribution to such Party as the source of the language in question. Phrases used in this Agreement may have similar meanings even if there is a slight deviation in the context or exact language used. The headings and table of contents used in this Agreement are for the convenience of reference only and shall not be used in construing this Agreement.

7.25 Discretion to Encumber; Mortgagee Protection.

7.25.1 This Agreement shall not prevent or limit Collaborative or an Assignee in any manner, in their respective sole discretion, from encumbering the Project Site or any portion of the Project Site or any improvement on the Project Site by any mortgage, deed of trust, or other security device securing financing with respect to the Project Site or its improvements. County acknowledges that the lenders providing such financing may require certain Agreement interpretations and modifications and agrees upon request, from time to time, to meet with Collaborative or any of its individual Members and representatives of such lenders to negotiate in good faith any such request for interpretation or modification. County will not unreasonably withhold its consent to any such requested interpretation or modification provided such interpretation or modification is consistent with the intent and purposes of this Agreement. Any Mortgagee of the Project Site shall be entitled to the following rights and privileges:

7.25.2 Neither entering into this Agreement nor a breach of this Agreement shall defeat, render invalid, diminish or impair the lien of a Mortgage on the Project Site made in good faith and for value, unless otherwise required by law.

7.25.3 If County timely received a request from a Mortgagee or Tax Credit Investor, as applicable, requesting a copy of a notice of default given to the Collaborative under the terms of this Agreement, County shall provide a copy of that notice to the Mortgagee or Tax Credit Investor within ten (10) days of sending the notice of default to the Collaborative. The Mortgagee or Tax Credit Investor, as applicable, shall have the right, but not the obligation, to cure the default during the remaining cure period allowed such Party under this Agreement.

7.26 Expedited Processing of Legal Actions. Collaborative and the County shall to cooperate in good faith for the expedited processing of any legal action seeking specific

performance, declaratory relief, or injunctive relief, to set court dates at the earliest practicable date(s), and not to cause undue delay in the prosecution/defense of the action, provided such cooperation shall not require any Party to waive any rights.

7.27 Counterparts. This Agreement may be executed in one or more counterparts, each of which shall be deemed an original, but all of which together shall constitute one and the same instrument. The delivery of a signed counterpart of this Agreement by facsimile or email, or electronic signature, shall have the same legal effect as delivery of an original signed counterpart by hand. This Agreement shall only be effective as a binding legal agreement among the parties after signed counterparts have been exchanged among the Parties.

[signatures on next page]

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IN WITNESS WHEREOF, the Parties hereto have executed this Agreement as of the Effective Date.

COUNTY OF LOS ANGELES,
a body, corporate and politic

By:_____
Name: _____
Title: _____

APPROVED AS TO FORM:

Dawyn R. Harrison,
County Counsel

By: _____
Name: _____
Title: _____

[signatures continued on next page]

Exhibit I

COLLABORATIVE:

CHARLES R. DREW UNIVERSITY OF MEDICINE AND SCIENCE,
a California nonprofit public corporation,

By:_____
Name: _____
Title: _____

CENTURY HOUSING CORPORATION,
a California nonprofit public benefit corporation

By:_____
Name: _____
Title:_____

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EXHIBIT "A"

Community Benefits[2]

Overview

In addition to performing any other obligations imposed by the Entitlements or elsewhere in this Agreement, and solely and exclusively in consideration for the County's entering into this Agreement, the Collaborative shall perform the Community Benefits contained in this Exhibit A, which benefits are agreed to by the Collaborative in exchange for the County's performance of its obligations in this Agreement including, without limitation, the County's assurances that the Project may be developed during the Term of this Agreement in accordance with the Applicable Rules and the Entitlements. Community Benefits do not include items otherwise required by the Entitlements as conditions of the Project; however, some of the items identified below are not exclusively Community Benefits (i.e. requirements that are provided with enhanced features).

Background

The Project will extend Charles Drew University's (University) mission by creating a mid-size residential college campus (with 2,000 to 4,000 students). With the new amenities developed as part of the Health and Wellness Campus, the University will be able to attract and accommodate a significantly greater number of students, community members and organizations in the expanded campus facilities within the University Wellness and Education Campus site. This will enable the University to train and graduate significantly more health professional leaders committed to social justice and health equity through outstanding education, research, clinical service, and community engagement. The University's graduates will be trained to provide culturally competent healthcare for families and residents in underserved communities, with the goal of increasing the supply of medical professionals in South Los Angeles and throughout Los Angeles County.

Community Benefits

1. Expansion of Science Academy Pipeline Programs and Learning Opportunities

Growth of the University through the Campus development will have a profound positive effect on the Willowbrook and SPA 6 communities through an expansion of educational pipeline programs for youth (K-12). The University's educational Science Academy Pipeline Programs (Pipeline Programs) include Saturday Science Academy II, Public Health Professions Pathways Program, Pathways to Health Careers, CDU Med Simulations, CDU Community STEMM Labs, Los Angeles Pediatric Society, CDU 3-Year Bachelor's Program, and the Junior White Coat Program (University educational pipeline programs). These educational pipeline programs provide students with deep foundational educational opportunities in math, science, research, experiential learning about medicine and science, and pathways to careers in health professions. In partnerships with strategic institutions, and by providing a new state-of-the-art learning space focused on math,

[2] Capitalized terms in this Exhibit A shall have the same meanings as defined in the Development Agreement unless otherwise provided.

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science, medicine, research, experiential and machine learning lab space, as described in Section [4.3.1], and well space on the Athletic Fields for outdoor programing and activities for K-through-12 students which are designed to catalyze student interest in the fields of medicine, science, and research. The University will utilize the Campus to significantly expand educational learning opportunities to more youth in the South Los Angeles region.

2. No-Cost Programming and Events.

2.1 Saturday Science Academy. The University will offer no cost participation in the Saturday Science Academy II program for students that reside within a quarter mile radius of the Wellness and Education Campus project, subject to prequalification criteria.

2.2 Events. The University shall facilitate events of public and community benefit as outlined below in Section 4. These events shall take place between 8AM – 10PM. Any event planned to accommodate in excess of 750 people will be subject to a Special Events Permit issued by the Department of Regional Planning.

3. Increasing the Supply of Housing for Low-Income Households, Student, Faculty and Workforce

3.1 General Affordable Housing. The project will deliver no less than 220, and up to 254 affordable housing units, encompassing 1-bedroom, 2-bedroom, and 3-bedroom configurations for the term of the ground lease. These homes will be available to the general public and will cater to a diverse range of residents, including families, small households, seniors, and individuals earning up to 80% of the Area Median Income (AMI).

3.2 Creation of Housing for Students, Workforce and Faculty. The development of up to four housing buildings will provide a minimum of 70 and up to 305 units of housing offered to students, faculty and workforce on the Campus, which will support the increased supply of housing for students in the community, creating a convenient solution for students, producing a positive local economic impact and promoting environmental stewardship. Approximately 67% of the University's undergraduate students receive Pell Grants, which is more than twice the national average of approximately 30%. Student family income eligibility to receive Pell Grants is capped at $45K, with the majority of awards being granted to students that have family income below $20K. Moreover, based on FAFSA (Free Application for Federal Student Aid) data, approximately 50% of the University's graduate students are first generation college students. Creation of student, faculty and workforce housing will generate more purchasing power within the local community – with discretionary income of the residents used to purchase goods and services in local restaurants, shops, and for other local services. Economic research shows that nearly 70% of the positive economic impact that universities have on local economies are derived from students. On-campus housing will reduce the number of vehicle miles traveled to get to and from the University, thereby reducing the number of greenhouse gas emissions and improving air quality. It will also create more pedestrian activity that will promote safety and enhance the vibrancy of the surrounding community.

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4. Privately Maintained Publicly Accessible Campus Facilities

4.1 Open Space and Walking Path. The Project will develop a total of approximately 221,548 sf (5.08 acres) of on-site open space. Of this amount, 53,678 sf 1.23 acres is required by the Willowbrook Transit Oriented District Specific Plan and is provided in the form of common and private opens space, including courtyards, passive recreation areas, and other features. An additional (approximately 167,850 square feet (3.85 acres) of non-required open space paths will be provided). This additional open space includes walking paths and landscaping accessible to local residents as well as the athletic field. The green space includes a variety of shade trees throughout the project site that number approximately 307 which reduces the heat island effect. The campus landscape includes a community accessible quarter-mile walking loop which is nestled among green spaces, lawns, trees, and landscape designed to create a serene walkable space that provides for calmness and peace which ultimately will affect the mental and physical well-being of students and community. Community access to walkable spaces will be during daylight hours. The space will feature design treatments to promote safety for both residents and members of the public, including a remotely monitored security camera system, emergency call box, and ample ground level lighting.

4.2 Public Access to Athletics Field and Facilities.

The Athletics Facilities are anticipated to include a basketball court, a swimming pool, an inside track, and an exercise room. The proposed Athletics Field would be used primarily as a soccer field but will also serve as a multi-purpose and functional space for other recreational, inter- and intra-mural sport uses, and other University and community-based events. The areas surrounding the athletic field may include garden spaces and walking paths, along with gathering and viewing areas.

4.2.1 Design Intent of Athletic Spaces. The Parking Structure and Athletics Facilities are designed and situated to help shield the inner campus from freeway noise and its influence on the quality of outdoor spaces. The Athletic Spaces were intentionally selected to make available impactful activities that contribute to the wellbeing and health of students and community members. The indoor swimming pool is especially important, given that according to the Centers for Disease Control and Prevention, Latino and Black populations experience a disproportionately higher rate of drowning deaths, respectively 1.5 times and 1.6 times higher than the White population. The ability for the public to access swimming lessons seeks to make a meaningful impact on this disparity.

4.2.2 Community Access. The University will provide community access to the Athletics Facilities and Athletics Field, which will include partnering with various private and public community focused organizations (i.e. senior support organizations, youth sports entities, high schools, soccer clubs, youth play equity focused entities, etc.). The University will have use agreements with local community-based organizations to allow use of the field, with a focus on K-12 youth, which could include local sports leagues, and K-12 schools. The community use of the Athletic Field will typically occur after school hours and during weekends when the field is not being used by the University. The use of the Athletic Field and Facilities by the public and/or outside organizations would generally be offered during the evening hours (6:00 pm – 11:00 pm) and on weekends. The University will develop a program to allocate time for the use of the

facilities within the Athletic Building and the Athletic field by community organizations and members of the public. This use may be managed through a rental or reservation system, or other appropriate use agreements.

4.2.3 Community Accessible Programming. The Athletics Field will be used for occasional entertainment events open to the community. One such event is Jazz at Drew (an annual weekend concert event currently held in September or October each year), which engages the local community and raises funds to support scholarships, student support services, and University pipeline programs. When fully operational, community programming shall be for no less than 12 events per year.

4.3 Campus Buildings.

4.3.1 State of the Art Educational Space. The University will retain five thousand square feet within the office building to house the University's Pipeline Programs Lab Space, which will be equipped for educational programming focused on math, science, medicine, research, and experiential and machine learning. The University's educational Pipeline Programs will operate in the space during weekdays and weekends, focused on engaging K-12 students from various partnering high schools, and other youth-oriented organizations.

4.3.2 Access to Meeting Space for Local Community Organizations and Stakeholders. The Campus will include facilities that are available to the community in several buildings. The University will allow community groups to use the spaces for gatherings, meetings, classes, and other activities through a reservation system when the spaces are not in use by the University. Use by outside organizations may also take place during the normal business hours of the university (6:00 am-11:00 pm, seven days a week).

4.3.3 Retail. The Café and Bookstore will be open and available to both students and the broader public providing additional retail opportunities for the surrounding community.

4.4 Pedestrian Promenade. Within seven (7) years from the effective date of the Agreement, the University shall submit a street vacation application for approximately 700 linear feet of East 118th street to be vacated and constructed into a privately-owned (maintained by the Collaborative), publicly accessible Pedestrian Promenade to serve as outdoor open space. The University will work with the County to expedite the approval of the street vacation and the clearance of conditions within nine (9) years of the effective date of the Agreement. Uses of the Pedestrian Promenade include pedestrian and bicycle travel and vehicular drop-off/turnarounds accessible from Compton Avenue along the western end of East 118th Street and adjacent to the existing Charles R. Drew University surface parking lot on the north and south sides of East 118th Street.

4.4.1 Design Features to be Maintained by the Collaborative. The Pedestrian Promenade will include landscaping and seating areas on its north and south sides as well as pedestrian walkways and bicycle lanes throughout.

4.4.2 Publicly Accessible Programs in the Promenade. Publicly accessible **programming** is anticipated to include: 1) Mobile Health Outreach that provides free health screenings, vaccinations, and other health services; 2) Medical wellness checks; 3) health and

wellness information sessions (i.e., health, exercise and diet; health disparity research findings; navigating the healthcare system; maternal health strategies; etc.); 4) community empowerment events (i.e., hosting education fairs, job fairs, hosting of the empowerment conference; etc.); 5) community gathering events (i.e., hosting community cultural events); and 6) farmers markets. Publicly accessible programing shall be no less than 12 events per year.

5. Public Art. The Collaborative will integrate public art into the building design in significant and prominent spaces. These spaces will foster a sense of place for residents and neighbors alike and will support the wellness campus mission. The Collaborative will collaborate with local stakeholders and arts-based organizations to identify local artists and determine thematic elements for each art treatment to ensure these installations reflect the surrounding community and culture. No less than 2 physical installations will be installed.

6. Public Safety

6.1 Traffic Safety Improvement. No later than the issuance of a certificate of occupancy for the parking structure, the Project will provide funding for a Rectangular Rapid Flashing Beacon (RRFB) to be installed by the County at the intersection of Compton Avenue and 117th Street. An RRFB generally consists of two rectangular- shaped yellow indications, each with a light-emitting diode (LED)-array-based light source. RRFBs flash with an alternating high frequency when activated by pedestrians to enhance visibility of pedestrians crossing the street at that location.

7. Project Delivery

7.1 Local and Targeted Worker Hiring Program. The Collaborative will use the Los Angeles County Local Hire and Disadvantaged Workers program for the project. The aim of this program is to hire local workers who live within a five-mile radius of the site and where the median annual income is near the poverty line. The implementation of this program requires that 30% of the total construction hours are worked by those residing within Los Angeles County. This policy is described in Attachment 1..

7.2 Apprenticeship Programs. The Collaborative will do outreach to community and regional apprenticeship programs including, but not limited to, the Watts Labor Action Committee and LA Trade Tech to encourage local participation in construction activities.

7.3 Underrepresented Businesses Participation. Outreach will be made to identify architects, consultants, engineers, contractors, subcontractors and vendors that represent underrepresented and local businesses. The University will research and reach out to local viable businesses and request proposals from them. The Collaborative has set a 20% goal for inclusion of underrepresented businesses.

7.4 Community Workforce Agreement. The University will enter into Community Workforce Agreement for the Parking Structure portion of the project, as defined by the County's Community Workforce Agreement Policy as constituted on the Effective Date of this Agreement.

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ATTACHMENT 1

LOS ANGELES COUNTY LOCAL AND TARGETED WORKER HIRING PROGRAM

All contractors providing services under the project agreements and/or contracts are to comply with the Los Angeles County Local and Targeted Worker Hiring Program (LTWHP) requirements and hiring goals. The project(s) will have a hiring goal of at least 30 percent of California Construction Labor Hours performed by either Tier 1 or Tier 2 Qualified Local Residents. California Construction Labor Hours are defined as all craft worker hours performed on the project by California residents, excluding the hours performed by off-site material fabricators, designers, project office staff or vendors.

A. POLICY REQUIREMENT FOR LOCAL RESIDENCY AREA FOR TIER 1 AND 2

1. A Tier 1 Qualified Local Resident is defined as a Los Angeles County resident whose primary residency is: (1) within five (5) miles of the project site; and (2) is within a qualifying Zip Code. If a qualified Zip Code is partially located within the 5-mile radius, then the entire Zip Code is considered as a Tier 1 Zip Code, and workers living in that entire Zip Code area may qualify as Tier 1.

2. A Tier 2 Qualified Local Resident is defined as a Los Angeles County resident whose primary residency is: (1) within a qualifying Zip Code, and (2) that qualifying Zip Code is beyond five (5) miles of the proposed project site.

3. A qualifying Zip Code is defined as a Zip Code within the Los Angeles County of Los Angeles, where either: (1) the average percentage of households living below 200% of the Federal Poverty Level (FPL) for that individual's primary residency's Zip Code is greater than the County average for such households; or (2) the Zip Code is one of 11 additional Zip Codes determined by the Board on September 6, 2011 to be a Zip Code where at least 30% of the population is living in poverty, and with an unemployment rate of at least 150% of the national average.

B. POLICY REQUIREMENT FOR TARGETED WORKERS ELIGIBILITY

A Targeted Worker is an individual who is both a Los Angeles County resident and who faces one or more of the following barriers to employment:

1. Has a documented annual income at or below 100% of the Federal Poverty Level:

2. Has no high school diploma or GED;

3. Has a history of involvement with the criminal justice system;

4. Is experiencing protracted unemployment (receiving unemployment benefits for at least six months);

5. Is a current recipient of government cash or food assistance benefits;

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6. Is homeless or has been homeless within the last year;

7. Is a custodial single parent;

8. Is a former foster youth;

9. Is a veteran, or is the eligible spouse of a veteran of the United States armed forces, under Section 2(a) of the Jobs for Veterans Act (38 U.S.C.4215(a));

10. Is an eligible migrant and seasonal farmworker;

11. Is currently an English language learner;

12. Is an older individual (55+);

13. Is disabled;

14. Is an individual with a low level of literacy; or

15. MC3 program graduates.

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EXHIBIT B

DISTRICT PROPERTY

THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE UNINCORPORATED AREA OF LOS ANGELES, IN THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

PARCEL 1:

LOTS 1 THROUGH 37, INCLUSIVE, IN BLOCK 7 OF TRACT NO. 5018, IN THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 54, PAGE 21 OF MAPS, RECORDED IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

EXCEPTING THEREFROM THAT PORTION OF LOT 27 CONVEYED TO THE COUNTY OF LOS ANGELES IN DEED RECORDED SEPTEMBER 10, 1971 AS INSTRUMENT NO. 4660, OF OFFICIAL RECORDS DESCRIBED AS FOLLOWS:

BEGINNING AT THE NORTHWESTERLY CORNER OF SAID LOT; THENCE EASTERLY ALONG THE NORTHERLY LINE OF SAID LOT A DISTANCE OF 18.88 FEET TO THE BEGINNING OF A CURVE CONCAVE TO THE SOUTHEAST, HAVING A RADIUS OF 19 FEET, TANGENT TO SAID NORTHERLY LINE AND TANGENT TO THE WESTERLY LINE OF SAID LOT; THENCE SOUTHWESTERLY ALONG SAID CURVE 29.72 FEET TO SAID WESTERLY LINE; THENCE NORTHERLY ALONG SAID WESTERLY LINE 18.88 FEET TO THE POINT OF BEGINNING.

ALSO EXCEPTING THEREFROM THAT PORTION OF LOT 37 CONVEYED TO THE COUNTY OF LOS ANGELES IN DEED RECORDED SEPTEMBER 10, 1971 AS INSTRUMENT NO. 4660, OF OFFICIAL RECORDS DESCRIBED AS FOLLOWS:

BEGINNING AT THE SOUTHWESTERLY CORNER OF SAID LOT; THENCE NORTHERLY ALONG THE WESTERLY LINE OF SAID LOT A DISTANCE OF 5.00 FEET; THENCE SOUTHEASTERLY IN A DIRECT LINE 7.05 FEET TO A POINT IN THE SOUTHERLY LINE OF SAID LOT DISTANT EASTERLY THEREON 5.00 FEET FROM THE POINT OF BEGINNING; THENCE WESTERLY ALONG SAID SOUTHERLY LINE 5.00 FEET TO SAID POINT OF BEGINNING.

PARCEL 2:

LOTS 23 THROUGH 32, INCLUSIVE, OF RICO ACRES, IN THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 13, PAGE 82 OF MAPS IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

ALSO EXCEPTING FROM LOT 29 AND PORTIONS OF LOTS 26 AND 31, ALL OIL, GAS AND OTHER HYDROCARBON SUBSTANCES AND OTHER MINERALS LOCATED BELOW A DEPTH OF 500 FEET BENEATH THE SURFACE OF SAID PROPERTY WITHOUT

Exhibit I

THE RIGHT OF ENTRY IN OR UPON THE SURFACE OF SAID PROPERTY OR ANY PORTION THEREOF TO DEPTH OF 500 FEET FROM THE SURFACE THEREOF.

APN: 6149-012-901, 6149-014-900, 6149-014-903, 6149-014-904

THOSE PORTIONS OF LOTS 10 THROUGH 16 INCLUSIVE, OF RICO ACRES, IN THE RANCHO TAJAUTA, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS SHOWN ON MAP RECORDED IN BOOK 13, PAGE 82 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, INCLUDED WITHIN THE FOLLOWING DESCRIBED LINES:

BEGINNING AT THE SOUTHWESTERLY CORNER OF SAID LOT 10; THENCE ALONG THE WESTERLY LINE OF SAID LOT 10, NORTH 00° 11'10" EAST, 137.49 FEET; THENCE SOUTH 84° 33' 40" EAST, 231.40 FEET TO A POINT IN THE EASTERLY LINE OF SAID LOT 11, DISTANT ALONG SAID EASTERLY LINE NORTH 00° 05' 21" EAST 113.82 FEET FROM THE SOUTHEASTERLY CORNER OF SAID LOT 11; THENCE SOUTH 81° 58' 14" EAST, 365.80 FEET; THENCE SOUTH 79° 02' 04" EAST, 303.65 FEET TO THE INTERSECTION OF THE WESTERLY LINE OF THE EASTERLY 10.00 FEET OF SAID LOT 16 WITH THE SOUTHERLY LINE OF SAID LOT 16; THENCE ALONG THE SOUTHERLY LINES OF SAID LOTS 16, 15, 14, 13, 12, 11 AND 10, SOUTH 89° 34' 08" WEST, 891.15 FEET TO THE POINT OF BEGINNING.

EXCEPT THAT PORTION OF EAST HALF AND WEST HALF OF LOT 10 IN DEED RECORDED DECEMBER 2, 1986, AS INSTRUMENT NO. 1664668 OFFICIAL RECORDS, FEBRUARY 26, 1981, AS INSTRUMENT NO. 207153 OFFICIAL RECORDS.

THERE SHALL BE NO ABUTTER'S RIGHTS OF ACCESS APPURTENANT TO THE ABOVE-DESCRIBED REAL PROPERTY IN AND TO THE ADJACENT STATE FREEWAY.

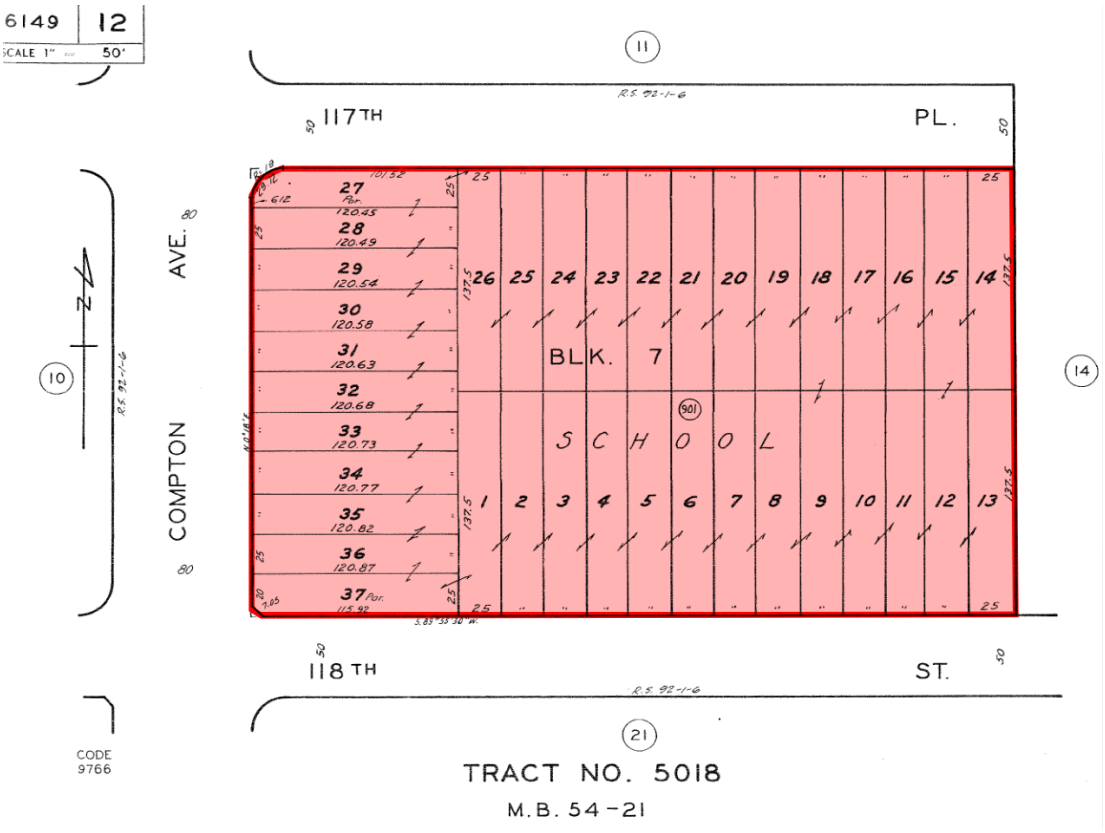
SUBJECT TO THE EXCEPTION THEREFROM, ALL OIL, OIL RIGHTS, MINERALS, MINERAL RIGHTS, NATURAL GAS, NATURAL GAS RIGHTS, AND OTHER HYDROCARBONS BY WHATSOEVER NAME KNOWN THAT MAY BE WITHIN OR UNDER THE HEREIN CONVEYED PARCEL OF LAND AND THE RIGHTS THERETO, TOGETHER WITH CERTAIN OTHER CONDITIONS, AS EXCEPTED IN DEED (STATE PARCEL 55839), TO THE STATE OF CALIFORNIA RECORDED NOVEMBER 30, 1984 AS DOCUMENT NO. 84-1413064, OFFICIAL RECORDS, IN DEED (STATE PARCEL 55840) RECORDED FEBRUARY 5, 1974 IN BOOK D6160, PAGE 708 OFFICIAL RECORDS, IN DEED (STATE PARCEL 55841) RECORDED NOVEMBER 30, 1977 AS DOCUMENT NO. 77-1315830 OFFICIAL RECORDS, IN DEED (STATE PARCEL 55842) RECORDED JUNE 18, 1981 AS DOCUMENT NO. 81-606841 OFFICIAL RECORDS, IN DEED (STATE PARCEL 55844) RECORDED APRIL 14, 1981 AS DOCUMENT NO. 81-372260 OFFICIAL RECORDS, IN DEED (STATE PARCEL 55849) RECORDED APRIL 20, 1982 AS DOCUMENT NO. 82-404929 OFFICIAL RECORDS, IN DEED (STATE PARCEL 55850) RECORDED JUNE 12, 1981 AS DOCUMENT NO. 81-586066, OFFICIAL RECORDS, IN DEED (STATE PARCEL 55852) RECORDED JULY 6, 1979 AS DOCUMENT NO. 79-736372 OFFICIAL RECORDS, IN DEED

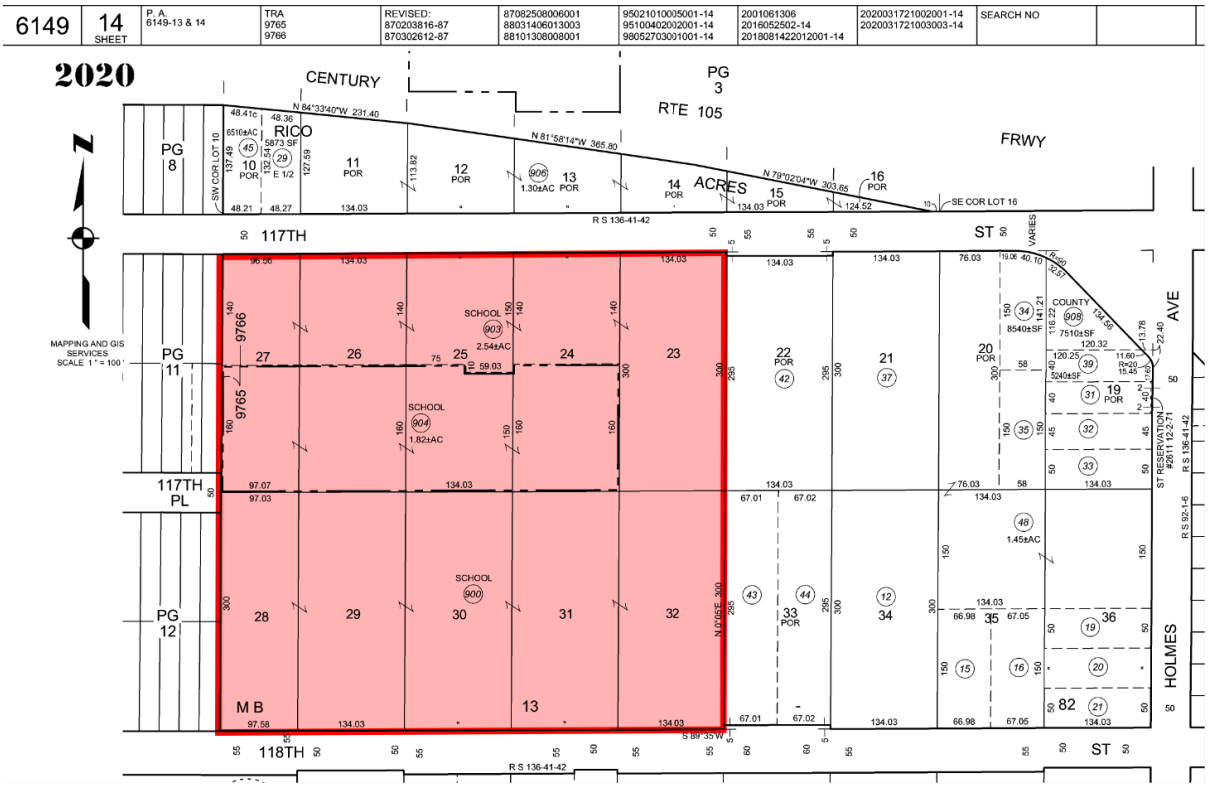
Exhibit I

(STATE PARCEL 55854) RECORDED FEBRUARY 26, 1981 AS DOCUMENT NO. 81- 207153 OFFICIAL RECORDS, IN DEED (STATE PARCEL 62306) RECORDED OCTOBER 26, 1981 AS DOCUMENT NO. 81-1051502 OFFICIAL RECORDS, IN DEED (STATE PARCEL 67319) RECORDED JULY 3, 1981 AS DOCUMENT NO. 81-666449, ALL OFFICIAL RECORDS IN SAID OFFICE.

APN: 6149-014-906

Exhibit I

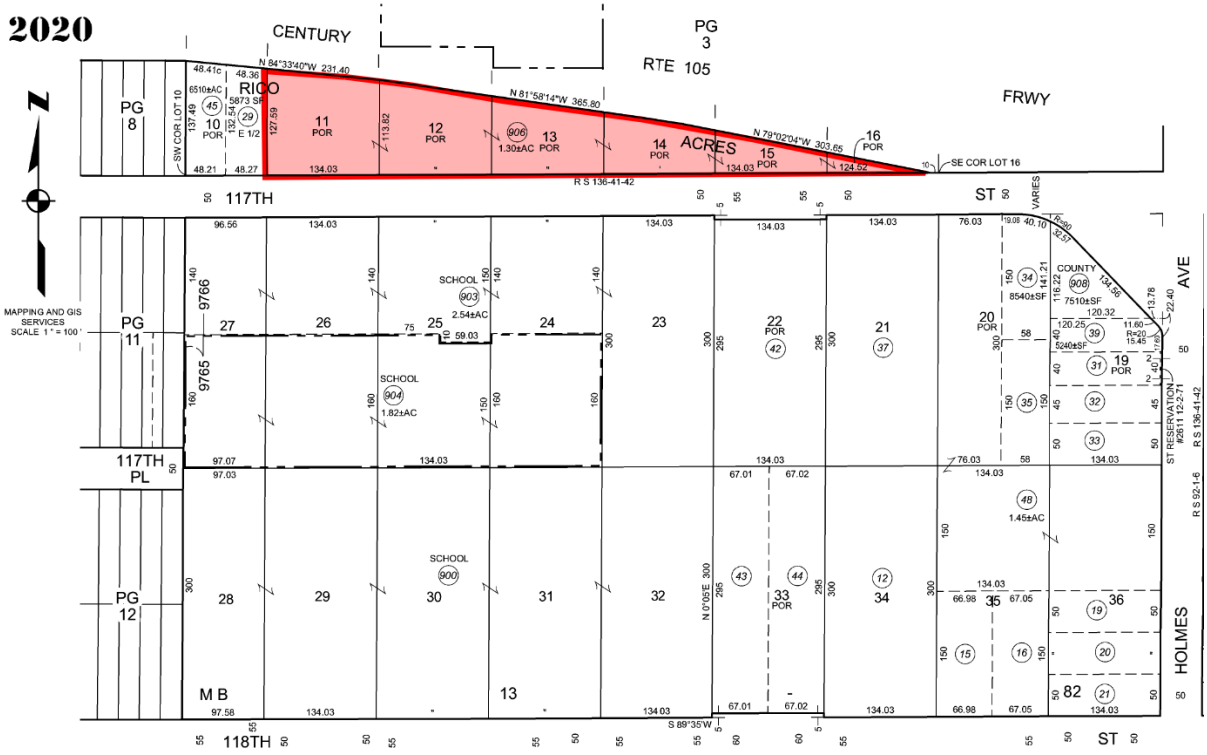




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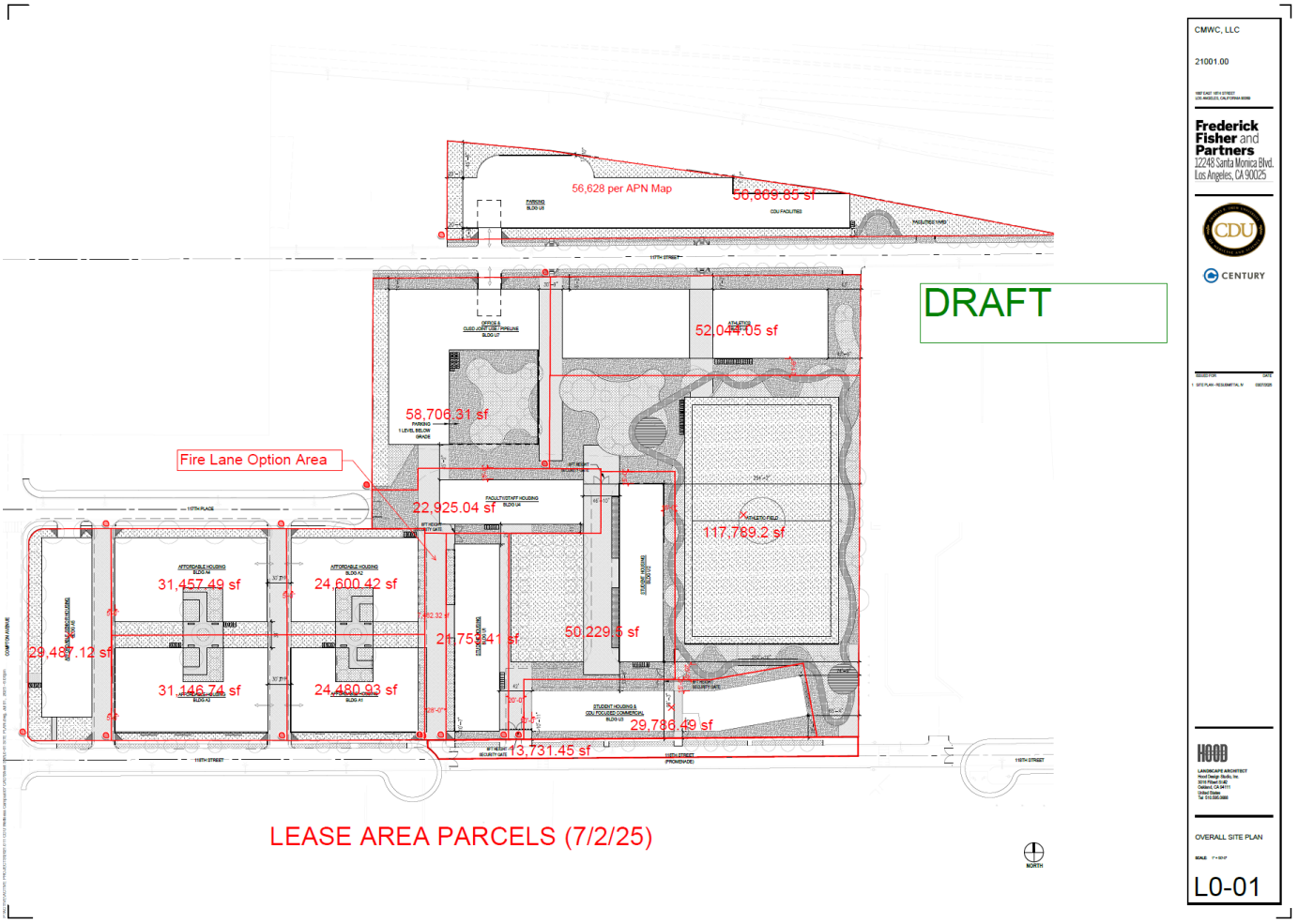
6149	14 SHEET	P. A. 6149-13 & 14	TRA 9765 9766	REVISED: 870203816-87 870302612-87	87082508006001 88031406013003 88101308008001	95021010005001-14 95100402002001-14 98052703001-14	2001061306 2016052502-14 20180814220120001-14	20200317210020001-14 20200317210030003-14	SEARCH NO	



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Exhibit I

EXHIBIT C



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Exhibit I

EXHIBIT D
Applicable Rules

As described in Section 1.8, for the convenience of the Parties in administration of this Agreement, the County has separately compiled the Applicable Rules and the CDU/MLK Wellness Collaborative, LLC has reviewed and concurred with said compilation, the acknowledgment of which is memorialized by the execution of this Agreement. For convenience purposes only, each Party will maintain a copy of the Applicable Rules at the following locations:

County:
County of Los Angeles
Department of Regional Planning
320 West Temple Street, 13th Floor
Los Angeles, CA 90012

CDU/MLK Wellness Collaborative, LLC:
Charles R. Drew University of Medicine and Science
Office of the President
1731 E. 120th Street
Los Angeles, CA 90059

Exhibit I

EXHIBIT E

SUSTAINABILITY FEATURES

- Construction Equipment. As a best management practice and sustainable feature of the Proposed Project, the construction contractors for each individual development area will use construction equipment that have engines of 25 horsepower (hp) or greater that complies with USEPA Tier 4 Final non-road engine standards and use electric welders during building construction.
- CALGreen Building Code & Title 24 Energy Code Compliance (2022 or current version at time of building permit issuance). As such, compliance with the 2022 or current version of CALGreen and 2022 or current version of Title 24 energy efficiency standards will be required. The CALGreen code sets the minimum green building code requirements for planning, energy efficiency, water efficiency, materials & resource efficiency, and environmental quality. The Title 24 Energy code sets the minimum efficiency standards for building envelope, glazing, roofing, HVAC, lighting, water heating, renewable energy, and battery storage.
- Electric Vehicle (EV) Charging: The Project will provide EV installed and capable parking spaces (conduit installed) for both residential and non-residential spaces in accordance with the current versions of the CALGreen code and the Los Angeles County Code at the time of building permit issuance.
- Solar Photovoltaics & Battery Storage: The Project will include solar photovoltaic (PV) as required by the Title 24 Energy Code, for all new residential buildings. The code minimum required PV system equates to an estimate of a 70% electricity offset for residential projects. Infrastructure for PV would be provided for all remaining buildings within the site. The Project will also include on-site battery storage, as required per Title 24 Code at the time of building permit issuance, to provide capabilities for peak-load demand management and resiliency for emergency use purposes.
- Air Filtration & Monitoring: The Project design will include HVAC systems that are equipped with Minimum Energy Report Value (MERV) filters to reduce the particulate matter that can enter the buildings. The ratings of the MERV filters will be in compliance with the current version of Title 24 and the Los Angeles County Code at the time of building permit issuance.
- Healthy Materials & Finishes: The Project design will include the specifications of paints, adhesives, and sealants that meet the California Air Resources Board (CARB) and South Coast Air Quality Management District (SCAQMD) thresholds for maximum levels of Volatile Organic Compounds (VOCs) and formaldehyde.
- Alternative Transportation Choices: The Project site is ideally located to encourage alternate transportation choices, with two Metro rail transit lines within two blocks. The Project design will include locations for bicycle parking in accordance with the version of the Los Angeles County Code at the time of building permit issuance. The partial vacation of E. 118th Street will encourage walking and biking to and from the adjacent Metro station.
- Sustainable Building Design and Materials for CDU Buildings. The CDU buildings of

Exhibit I

the Proposed Project will be designed and include materials that are environmentally sustainable. The building and design elements include daylighting and acoustic performance, low-emitting materials, locally sourced products and materials, rainwater management and other sustainable design features. These building and design elements will be equivalent to the requirements of the Leadership in Energy & Environmental Design (LEED) certified-level.

- Sustainable Building Design and Materials for Affordable Residential Buildings. The affordable residential portions of the Proposed Project will be designed and include materials that are environmentally sustainable. The building and design elements will include categories of sites, water, energy, materials, and indoor environment that follow sustainable design best practices for the design, engineering, construction, and operations aspects of the affordable residential buildings. These building and design elements will be equivalent to the requirements of the LEED-Homes or GreenPoint Rated New Home Multifamily rating systems.

Exhibit I

EXHIBIT F

Exhibit I

Mitigation Monitoring and Reporting Program CDU Wellness and Education Campus

CEQA Requirements

Section 15097 of the CEQA Guidelines requires a public agency to adopt a program for monitoring or reporting on the changes it has required in the project or conditions of approval to substantially lessen significant environmental effects. This Mitigation, Monitoring and Reporting Program (MMRP) summarizes the mitigation commitments identified in the CDU Wellness and Education Campus Addendum to the Willowbrook Transit Oriented District Specific Plan Final Program EIR (State Clearinghouse No. 2015101106). Mitigation measures are presented in the same order as they occur in the Addendum.

The columns in Table 1 below provide the following information:

- **Mitigation Measure(s):** The action(s) that will be taken to reduce the impact to a less-than-significant level.
- **Action Required:** The appropriate steps to implement and document compliance with the mitigation measures.
- **Mitigation Timing:** The general schedule for conducting each task.
- **Responsible Party:** The agency or private entity responsible for ensuring implementation of the mitigation measure. However, until the mitigation measures are completed, the County of Los Angeles, as the CEQA Lead Agency, remains responsible for ensuring that implementation of the mitigation measures occur in accordance with the MMRP (CEQA Guidelines, Section 15097(a)).
- **Monitoring Agency or Party:** The agency or private entity responsible for reviewing and/or overseeing implementation of the mitigation measure.

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TABLE 1
MITIGATION MONITORING AND REPORTING PROGRAM FOR THE CDU WELLNESS AND EDUCATION CAMPUS

Mitigation Measures	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
Air Quality				
AIR-2: The County shall ensure that project approvals within the Specific Plan area require that all active construction areas shall be watered at least four times daily to reduce fugitive dust emissions from grading, excavation, and other ground preparation. Watering shall be sufficient to prevent airborne dust from leaving the site. Increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. Reclaimed water shall be used whenever possible.	Maintain log demonstrating compliance	Prior to commencement of construction and during construction	Applicant, Construction Manager	LACDRP
AIR-3: Reduction or elimination of fireplaces within residential development such that there are no fireplaces within 95 percent of all new/redeveloped single family residential development or 100 percent of all multifamily residential development (new and redeveloped) within the Specific Plan area. Compliance would be ensured through County review prior to the issuance of a building permit.	Submit site plan review application	Prior to building permit	Applicant	LACDRP/LACFD
AIR-4: All commercial development will use low-VOC architectural coating such that interior coatings do not exceed 10 grams per liter (g/l) of VOC content and exterior coatings do not exceed 100 g/l. This measure is to be made a condition of approval for continued upkeep of the property.	Submit site plan review application	Prior to building permit	Applicant	LACDRP
	Maintain log demonstrating compliance	During and after construction	Applicant, Construction Manager	LACDRP
AIR-5: All commercial developments will use low-VOC cleaning supplies. This measure is to be made a condition of approval for continued upkeep of the property.	Submit site plan review application	Prior to building permit	Applicant	LACDRP
	Maintain log demonstrating compliance	During and after construction	Applicant, Construction Manager	LACDRP
AIR-6: All new development shall comply with the Title 24 requirements in effect at the time of construction and shall, at a minimum, exceed 2013 Title 24 energy efficiency standards by 15 percent.	Maintain log demonstrating compliance	During Construction	Applicant, Construction Manager	LACDRP
Cultural Resources				
CUL-5: Avoidance, preservation or data recovery shall occur for archaeological resources that could be affected by ground disturbing activities and are found to be significant resources. To ensure that developments in accordance with the Specific Plan do not result in significant impacts to pre-historic or historic archaeological resources, the following shall be implemented. The Applicant shall retain an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for Archaeology (Qualified Archaeologist) to carry out all mitigation related to archaeological resources. Prior to start of ground-disturbing activities, the Qualified Archaeologist or their designee shall conduct cultural resources sensitivity training for all construction personnel. Construction personnel shall be informed of the types of archaeological resources that may be encountered, the proper procedures to be	Prepare a Phase I cultural resources inventory	Before construction	Applicant	LACDRP

Mitigation Measures	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
enacted in the event of an inadvertent discovery of archaeological resources or human remains, and safety precautions to be taken when working with archaeological monitors. The County shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance. Archaeological monitoring shall be conducted during ground disturbing activities, such as clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the Project. Monitoring shall be conducted by an archaeologist who is familiar with the types of archaeological resources that could be encountered and who will work under the direct supervision of the Qualified Archaeologist. Monitoring can be reduced to part-time inspections or ceased entirely if determined appropriate by the Qualified Archaeologist, based on field observations.	Submit California Department of Parks and Recreation Site Forms, and data recovery and associated documentation, as applicable	Before construction	Applicant	LACDRP
During project-level construction, should prehistoric or historic subsurface cultural resources be discovered, the archaeological monitor shall be empowered to halt or redirect ground-disturbing activities away from the vicinity of the discovery (within approximately 100 feet) until it has been evaluated. The archaeological monitor shall keep daily logs detailing the types of activities and soils observed, and any discoveries. The Qualified Archaeologist shall assess the significance of the find according to CEQA Guidelines Section 15064.5. If any find is determined to be significant, the archaeologist shall determine, in consultation with the County, and local Native American groups expressing interest, appropriate avoidance measures or other appropriate mitigation. Per CEQA Guidelines Section 15126.4(b)(3), project redesign and preservation in place shall be the preferred means to avoid impacts to significant cultural resources. Methods of avoidance may include, but shall not be limited to, project re-route or re-design, project cancellation, or identification of protection measures such as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the Qualified Archaeologist shall develop additional treatment measures within an Archaeological Resources Treatment Plan in consultation with the County and local Native American groups expressing interest, which may include data recovery or other appropriate measures. All significant cultural materials recovered will be, as necessary and at the discretion of the consulting archaeologist and in consultation with local Native American groups expressing interest, subject to scientific analysis, professional museum curation, and documentation according to current professional standards. The treatment plan shall include provisions for the final disposition of the recovered resources, which may include onsite reburial, curation at a public, non-profit institution, or donation to a local Native American Tribe, school, or historical society. At the conclusion of archaeological monitoring and prior to the release of the grading bond, the Qualified Archaeologist shall prepare a final monitoring report. The report shall include a summary of monitoring results, description of resources unearthed, if any, significance evaluation and treatment of the resources, and the results of the artifact processing, analysis, and research. Appropriate California Department of Parks and Recreation 523 Forms shall be appended to the report, as necessary. The report shall be submitted by the Applicant to the County to signify the satisfactory completion of the Project and required mitigation measures. The Qualified Archaeologist shall submit the final report to the South Central Coastal Information Center within 30 days of its acceptance by the County.	Submit final report, as applicable	Prior to issuance of certificate of occupancy	Applicant/ Qualified Archaeologist	LACDRP, California Office of Historic Preservation for support/referral, CHRIS-SCCIC

Exhibit I

Mitigation Measures	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
CUL-6: The project applicant shall retain a qualified paleontologist (in accordance with the Society of Vertebrate Paleontologists) to monitor all ground-disturbing activities in native soils or sediments beginning at five feet below ground surface and deeper. If the paleontologist, upon observing initial earthwork, determines there is low potential for discovery, no further action shall be required and the paleontologist shall submit a memo to the County confirming findings of low potential. If the qualified paleontologist, upon observing initial earthwork, determines there is a moderate to high potential for discovery, a qualified paleontologist or paleontological monitor (retained by the County) shall monitor all mass grading and excavation activities. Monitoring will be conducted in areas of grading or excavation in undisturbed formation sediments, as well as where over-excavation of surficial alluvial sediments will encounter these formations in the subsurface. Paleontological monitors shall be equipped to salvage fossils as they are unearthed to avoid construction delays and to remove samples of sediment that are likely to contain the remains of small fossil invertebrates and vertebrates. The monitor must be empowered to temporarily halt or divert equipment to allow removal of abundant or large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface, or if present, are determined on exposure and examination by qualified paleontological personnel to have low potential to contain fossil resources. Should any paleontological resources (i.e., fossils) be uncovered during project construction activities, all work within a 100-foot radius of the discovery site shall be halted or diverted to other areas on the site and the County shall be immediately notified. The qualified paleontologist shall evaluate the finds and recommend appropriate next steps to ensure that the resource is not substantially adversely impacted, including but not limited to avoidance, preservation in place, excavation, documentation, curation, data recovery, or other appropriate measures. Further, ground disturbance shall not resume within a 100-foot radius of the discovery site until an agreement has been reached between the project applicant, the qualified paleontologist, and the County as to the appropriate preservation or mitigation measures to ensure that the resource is not substantially adversely impacted. Any recovered paleontological specimens shall be identified to the lowest taxonomic level possible and prepared for permanent preservation. Screen-washing of sediments to recover small invertebrates and vertebrates shall occur if necessary. Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage shall occur at an institutional repository approved by the County. The paleontological program shall include a written repository agreement prior to the initiation of mitigation activities. A final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered and necessary maps and graphics to accurately record their original location. The report, when submitted to an accepted by the County, shall signify satisfactory completion of the project program to mitigation impacts to any potential nonrenewable paleontological resources (i.e., fossils) that might have been lost or otherwise adversely affected without such a program in place.	Submit Monitoring Plan	Prior to construction	Applicant/ Qualified Paleontologist	LACDRP
	Submit data recovery and associated documentation, as applicable	Prior to issuance of certificate of occupancy	Applicant/ Qualified Paleontologist	LACDRP
	Submit final report, as applicable	Prior to issuance of certificate of occupancy	Applicant/ Qualified Paleontologist	LACDRP
CUL-7: If human remains are encountered, the Applicant shall halt work in the vicinity (within 100 feet) of the find and contact the Los Angeles County Coroner in accordance with PRC Section 5097.98 and Health and Safety Code Section 7050.5. If the County Coroner determines that the remains are of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC) in accordance with Health and Safety Code Section 7050.5, subdivision (c), and PRC Section 5097.98. The NAHC shall then	Submit documentation	Prior to issuance of certificate of occupancy	Applicant/ Qualified Archaeologist	LACDRP

Mitigation Measures	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
identify the person(s) thought to be the Most Likely Descendent (MLD). The MLD may, with the permission of the landowner, or his or her 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. Upon the discovery of the Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this mitigation measure, with the MLD regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the MLD on all reasonable options regarding their preferences for treatment.				
Noise and Vibration				
NOI-1: Prior to the issuance of building permits, exterior areas of proposed multiple family residential uses that are projected to be exposed to existing with Project roadway noise levels and cumulative with Project roadway noise levels exceeding the County's exterior noise standards (i.e., 65 dBA CNEL for multiple family residential) shall include noise attenuation features including, but not limited to, setbacks, soundwalls, glass noise barriers, and landscaping so that exterior areas meet the County's exterior noise standards. In addition, construction activities on the Project site will include construction techniques such as sound barriers and sound blankets where necessary to meet the County's Noise Ordinance. To ensure that the County's exterior noise standard for the proposed multi-family residential uses (65 dBA CNEL) are met, the Applicant shall demonstrate compliance through the preparation of an acoustical evaluation and if the Proposed Project's construction techniques identified in Section 2.4.7 of this Addendum are modified, the Applicant shall demonstrate compliance with the County's Noise Ordinance to the County Department of Public Health through the preparation of an acoustical evaluation.	Submit site plan review application	Prior to issuance of building permit	Applicant	LACDPH
NOI-3: Prior to approval of a grading permit or building permit, construction equipment shall be prohibited within 50 feet of occupied residential structures. If construction equipment is required to be within 50 feet of occupied residential structures, the project applicant shall demonstrate that the human annoyance threshold of 80 VdB (0.04 in/sec PPV) and structural damage thresholds of 0.2 in/sec PPV for non-engineered timber and masonry buildings and 0.12 in/sec PPV for historic-age buildings that are extremely susceptible to vibration damage is achieved. Demonstration of compliance shall be provided through the preparation of a vibration analysis.	If construction equipment is required to be within 50 feet of occupied residential structures, submit vibration analysis report for review and approval	Prior to issuance of grading or building permit	Applicant	LACDPH

Exhibit I

EXHIBIT G

RESERVED

Exhibit I

EXHIBIT H

Willowbrook TOD Specific Plan Area Goals and Policies

First Nations

The project site is located within the territory of the native population known today as the Gabrieleno. Prior to European contact, the Gabrieleno occupied a diverse area that included the watersheds of the Los Angeles, San Gabriel, and Santa Ana rivers; the Los Angeles basin and foothills; and offshore islands of Santa Catalina, San Nicolas, and San Clemente. In ancient times the village areas adjoined and overlapped with each other, at least during the Late Prehistoric and Protohistoric periods where resources were shared by adjoining villages. The village lifestyle was focused around commerce with local and long distance trade a prominent function of the community. Resources were attained through a hunter-gatherer lifestyle while living in permanent communities located near the presence of water, a stable food supply, and some measure of protection from flooding. Houses were made of tule mats on a framework of willow poles. Basketry and steatite vessels were used rather than ceramics; ceramics became common only toward the end of the Mission Period in the nineteenth century. Villages in and around the project area exhibited similar organization and resource procurement strategies and were based on clan or lineage groups with their home base sites marked by midden deposits often with bedrock mortars and fire hearth locations. Average community populations generally ranged from 50-100 inhabitants, although larger settlements existed. Trade routes provided for daily travel, recreation, and commerce activities to occur over thousands of years. During seasonal rounds to exploit natural resources, small groups would move along trading routes within their traditional territory in search of specific plants, minerals, and animals. Their gathering strategies often left behind signs of special use sites at the locations of the resources. As well, ceremonial areas would contain buried caches of relics that were used for ceremony and would be buried and dug up every time a ceremony was conducted. These buried caches were stored in the earth much like a storage cabinet would be used in a home for protection from damage and the elements. However, there were also buried caches of relics that were never meant to be dug up and were placed in a specific orientation in the earth.

1.6 Specific Plan Goals and Policies

The goals and policies set the framework for the Willowbrook TOD Specific Plan. They serve as guidelines for decision-making and provide direction for future activities. The goals and policies were derived from input received from the community and stakeholders during the community engagement process, County Project Task Force, and DRP staff during the planning process. The seven major goals identified for the Plan Area are as follows:

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

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

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

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

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

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

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

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

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

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

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

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

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

Goal 3: Encourage transit-oriented development.

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

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

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

Goal 4: Provide affordable housing opportunities.

Policy 4.1: Preserve existing stock of affordable housing.

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

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

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

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

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

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

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

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

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

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

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

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

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

Policy 6.7: Build pocket parks and community gardens on available County-owned vacant lots.

Goal 7: Improve economic vitality and employment opportunities.

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

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

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

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

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

Exhibit I

EXHIBIT I

Compliance Certificate

Exhibit I

RECORDING REQUESTED BY:

LOS ANGELES COUNTY DEPT. OF REGIONAL PLANNING

AND WHEN RECORDED MAIL TO:

_____

_____

_____

_____

_____

Exempt from Recording Fees (Govt. Code 6103 and 27383)

COMPLIANCE CERTIFICATE

DEVELOPMENT AGREEMENT BY AND AMONG LOS ANGELES COUNTY AND CDU/MLK WELLNESS COLLABORATIVE, LLC

This CERTIFICATE OF DEVELOPMENT AGREEMENT COMPLIANCE (this "Certificate"), effective as of _____, 20___ ("Effective Date"), is made by the COUNTY OF LOS ANGELES, a body corporate and politic (the "County") and provided to and for the benefit of CDU/MLK WELLNESS COLLABORATIVE, LLC, a California limited liability company ("Developer").

RECITALS

A. In accordance with the Development Agreement Act, of the State of California (Government Code Section 65864 *et seq*.), Title 22, Chapter 22.162 of the Los Angeles County Code ("Development Agreement Ordinance"), and the implementing procedures of the County, the County acting through its Board of Supervisors, adopted Ordinance No. _____, on _____, 2026 approving a Development Agreement (the "Development Agreement") for a project as therein described (the "Project") on certain real property located within Los Angeles County, as more particularly described therein and on Exhibit A attached hereto and incorporated herein by this reference (the "Property"). [If any amendments have been made, identify such amendments in this recital and revise defined terms accordingly.]

B. The Development Agreement was recorded in the Office of the Recorder of the County of Los Angeles, State of California on _____ 2026 as Instrument No. _____. Unless otherwise defined in this Certificate, all initially capitalized defined terms used in this Certificate and not otherwise defined shall have the meanings ascribed to such terms in the Development Agreement.

C. Consistent with the requirements of the Development Agreement, the Development Agreement Act and the Development Agreement Ordinance, the County conducted

Exhibit I

an Annual Review for the year [Insert year of review, 30-year term] on _____20__. [Insert date of and action taken by County regarding determination of compliance for the Annual Review.]

D. Pursuant to Section 5.2 of the Development Agreement, Developer requested that the County issue a Compliance Certificate for the [____] year.

NOW, THEREFORE, the County certifies, represents and warrants for the benefit of Developer as follows:

1. Development Agreement in Effect. The Development Agreement is in full force and effect, and the County has not agreed to any amendment of any provision of the Development Agreement [other than as expressly identified in the Recital A of this Certificate].

2. Compliance with Development Agreement. Developer is, to the current knowledge of the County, and based on the County's investigation during the Annual Review, in good faith compliance with the Development Agreement, as required by Section 65865.1 of the Development Agreement Act.

3. Determinations Conclusive. This Certificate constitutes and shall evidence the County's conclusive determination of the matters set forth herein.

[Signature page follows.]

Exhibit I

IN WITNESS WHEREOF, County has caused this Certificate to be duly executed on its behalf as of the Effective Date.

COUNTY OF LOS ANGELES,
a body corporate and politic

By:_____
Name: _____
Title: _____

Exhibit I

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

STATE OF CALIFORNIA)
) SS.
COUNTY OF _____

On before me, Notary Public in and for said state, personally appeared _____who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

_____

Signature (Seal)

Exhibit I

EXHIBIT A

Legal Description of Property

Exhibit I

EXHIBIT J

Estoppel Certificate

Exhibit I

ESTOPPEL CERTIFICATE

DEVELOPMENT AGREEMENT BY AND AMONG LOS ANGELES COUNTY AND CDU/MLK WELLNESS COLLABORATIVE, LLC

This ESTOPPEL CERTIFICATE (this "Certificate"), effective as of _____, 20___ ("Effective Date"), is made by the COUNTY OF LOS ANGELES, a body corporate and politic (the "County") and provided to and for the benefit of CDU/MLK WELLNESS COLLABORATIVE, LLC, a California limited liability company ("Developer").

RECITALS

A. In accordance with the Development Agreement Act, of the State of California (Government Code Section 65864 *et seq*.), Title 22, Chapter 22.162 of the Los Angeles County Code ("Development Agreement Ordinance"), and the implementing procedures of the County, the County acting through its Board of Supervisors, adopted Ordinance No. _____, on _____, 2026 approving a Development Agreement (the "Development Agreement") for a project as therein described (the "Project") on certain real property located within Los Angeles County, as more particularly described therein and on Exhibit A attached hereto and incorporated herein by this reference (the "Property"). [If any amendments have been made, identify such amendments in this recital and revise defined terms accordingly.]

B. The Development Agreement was recorded in the Office of the Recorder of the County of Los Angeles, State of California on _____ 2026, as Instrument No. _____. Unless otherwise defined in this Certificate, all initially capitalized defined terms used in this Certificate and not otherwise defined shall have the meanings ascribed to such terms in the Development Agreement.

C. Pursuant to Section 5.2 of the Development Agreement, Developer has requested that the County provide this Certificate for the purpose of representing that (a) the Development Agreement is unmodified and in full force and effect, or if there have been modifications hereto, that the Development Agreement is in full force and effect as modified and stating the date and nature of such modifications; (b) that there are no known current uncured defaults under the Development Agreement or specifying the dates and nature of any such known default; and (c) _____.

NOW, THEREFORE, the County certifies, represents and warrants for the benefit of Developer:

1. Development Agreement in Effect. The Development Agreement is in full force and effect, and the County has not agreed to any amendment of any provision of the Development Agreement [other than as expressly identified in the Recital A of this Certificate].

Exhibit I

2. No Defaults. To the actual knowledge of the County, no default on the part of Developer, and no breach or failure of condition that, with notice or lapse of time or both, would constitute a default on the part of Developer, exists under the Development Agreement.

3. [Other Information Requested. As provided in Section 5.2 of the Development Agreement, Developer has requested that _____].

[Signature page follows.]

Exhibit I

IN WITNESS WHEREOF, County has caused this Certificate to be duly executed on its behalf as of the Effective Date.

COUNTY OF LOS ANGELES,
a body corporate and politic

By: _____
Name: _____
Title: _____

APPROVED AS TO FORM:

Dawyn R. Harrison,
County Counsel

By: _____
Name: _____
Title: _____

Exhibit I

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validit of that document.

STATE OF CALIFORNIA)
) SS.
COUNTY OF)

On before me, Notary Public in and for said state, personally appeared _____who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

_____

Signature (Seal)

DRAFT

Exhibit I

EXHIBIT A

Legal Description of Property

DRAFT

Exhibit I

EXHIBIT K

Form of Operating Memorandum

Exhibit I

RECORDING REQUESTED BY:

LOS ANGELES COUNTY DEPT. OF REGIONAL PLANNING

AND WHEN RECORDED MAIL TO:

_____
_____
_____
_____
_____

Exempt from Recording Fees (Govt. Code 6103 and 27383)

OPERATING MEMORANDUM

DEVELOPMENT AGREEMENT BY AND AMONG LOS ANGELES COUNTY AND CDU/MLK WELLNESS COLLABORATIVE, LLC

This OPERATING MEMORANDUM (this "Memorandum"), effective as of _____, 20___ ("Effective Date"), is made by the COUNTY OF LOS ANGELES, a body corporate and politic ("County") and provided to and for the benefit of CDU/MLK WELLNESS COLLABORATIVE, LLC, a California limited liability company ("Developer").

RECITALS

A. In accordance with the Development Agreement Act, of the State of California (Government Code Section 65864 *et seq*.), Title 22, Chapter 22.162 of the Los Angeles County Code ("Development Agreement Ordinance"), and the implementing procedures of the County, the County acting through its Board of Supervisors, adopted Ordinance No. _____, on _____, 2026 approving a Development Agreement (the "Development Agreement") for a project as therein described (the "Project") on certain real property located within Los Angeles County, as more particularly described therein and on Exhibit A attached hereto and incorporated herein by this reference (the "Property"). [If any amendments have been made, identify such amendments in this recital and revise defined terms accordingly.]

A. The Development Agreement was recorded in the Office of the Recorder of the County of Los Angeles, State of California on _____ 2026, as Instrument No. _____. Unless otherwise defined in this Certificate, all initially capitalized defined terms used in this Certificate and not otherwise defined shall have the meanings ascribed to such terms in the Development Agreement.

DRAFT

Exhibit I

B. Pursuant to Section 7.9.1 of the Development Agreement, Developer and the County may set forth certain changes, adjustments and/or clarifications in an Operating Memorandum, which changes, adjustments and/or clarifications are intended to constitute ministerial clarifications to the Development Agreement.

C. Developer has requested that the County execute this Memorandum for purposes of _____ (the "Requested Clarifications"). [TO BE FILLED IN]

D. The County has determined that the Requested Clarifications will not result in material change in fees or cost, an increase in the density or intensity of use, material change in permitted uses, an increase in maximum height and size of buildings, a decrease in the amount of land to be dedicated for public purposes (including without limitation Community Benefits), or the reduction of improvement or construction standards and specifications for the Project.

AGREEMENT

NOW, THEREFORE, in consideration of the above Recitals, which are hereby incorporated into this Memorandum as if set forth in full herein, the mutual covenants contained herein, and other good and valuable consideration, which the parties hereby acknowledge as adequate and sufficient, Developer and the County hereby agree as follows:

1. Not an Amendment. The Requested Clarifications are intended to provide clarification of the terms of the Development Agreement, and shall not constitute an amendment thereof.

2. Determinations Conclusive. This Memorandum constitutes and shall evidence the County's conclusive determination of the matters set forth herein.

[Signature page follows.]

DRAFT

Exhibit I

IN WITNESS WHEREOF, County has caused this Memorandum to be duly executed on its behalf as of the Effective Date.

COUNTY OF LOS ANGELES,
a body corporate and politic

By:_____
Name: _____
Title: _____

DRAFT

Exhibit I

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

STATE OF CALIFORNIA)
) SS.
COUNTY OF _____

On before me, Notary Public in and for said state, personally appeared _____who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

_____

Signature (Seal)

Exhibit I

EXHIBIT A

Legal Description of Property

Exhibit I

EXHIBIT L

Street Vacation Area

LEGAL DESCRIPTION

THOSE PORTIONS OF LOTS 33, 39 THROUGH 43, 45, AND 118TH STREET (FORMERLY COLUMBUS AVENUE), 50.00 FEET WIDE, AS SHOWN ON THE MAP OF RICO ACRES, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 13, PAGE 82 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, MORE PARTICULARLY DESCRIBED AS FOLLOWS:

BEGINNING AT THE SOUTHEASTERLY CORNER OF LOT 34 OF SAID RICO ACRES, SAID POINT ALSO BEING ON THE NORTHERLY LINE OF SAID 118TH STREET; THENCE WESTERLY, ALONG SAID NORTHERLY LINE 97.01 FEET TO THE TRUE POINT OF BEGINNING; THENCE PERPENDICULAR, LEAVING SAID NORTHERLY LINE, SOUTH 00°25'00" EAST, 4.13 FEET TO THE BEGINNING OF A NON-TANGENT CURVE, CONCAVE SOUTHEASTERLY, HAVING A RADIUS OF 38.00 FEET, A RADIAL LINE TO THE BEGINNING OF SAID CURVE BEARS NORTH 01°28'28" EAST; THENCE SOUTHWESTERLY, ALONG SAID CURVE, THROUGH A CENTRAL ANGLE OF 111°42'48", AN ARC LENGTH OF 74.09 FEET TO A POINT ON A NON-TANGENT LINE, SAID LINE BEING PARALLEL WITH AND DISTANT 5.00 FEET SOUTHERLY FROM THE SOUTHERLY LINE OF SAID 118TH STREET, SAID LINE ALSO BEING ON THE SOUTHERLY LINE OF THE ROAD DEED RECORDED APRIL 4, 1975 AS INSTRUMENT NUMBER 4443, OFFICIAL RECORDS OF SAID COUNTY; THENCE ALONG SAID PARALLEL LINE SOUTH 89°35'00" WEST, 268.13 FEET TO A POINT ON THE WESTERLY LINE OF SAID LOT 41, SAID POINT ALSO BEING THE SOUTHWESTERLY CORNER OF THE ROAD DEED RECORDED AUGUST 6, 1975 AS INSTRUMENT NUMBER 3950, OFFICIAL RECORDS OF SAID COUNTY; THENCE ALONG SAID WESTERLY LINE, NORTH 00°05'00" EAST, 5.00 FEET TO THE NORTHWESTERLY CORNER OF SAID LOT 41; THENCE ALONG SAID SOUTHERLY LINE OF 118TH STREET, SOUTH 89°35'00" WEST, 54.03 FEET TO A POINT BEING 80.00 FEET WESTERLY OF THE NORTHWESTERLY CORNER OF SAID LOT 42; THENCE ALONG A LINE PARALLEL WITH AND DISTANT 80.00 FEET WESTERLY OF SAID LOT 42, SOUTH 00°05'00" WEST, 5.00 FEET TO A POINT ON A LINE PARALLEL WITH AND DISTANT 5.00 FEET SOUTHERLY FROM SAID SOUTHERLY LINE, SAID POINT ALSO BEING THE SOUTHEASTERLY CORNER OF THE ROAD DEED RECORDED JANUARY 7, 1988 AS INSTRUMENT NUMBER 1988-20879, OFFICIAL RECORDS OF SAID COUNTY; THENCE ALONG SAID PARALLEL LINE SOUTH 89°35'00" WEST, 214.04 FEET TO A POINT ON THE WESTERLY LINE OF SAID LOT 43; THENCE ALONG SAID WESTERLY LINE NORTH 00°05'00" EAST, 5.00 FEET TO THE NORTHWESTERLY CORNER OF SAID LOT 43; THENCE ALONG SAID SOUTHERLY LINE SOUTH 89°35'00" WEST, 134.04 FEET TO THE NORTHEASTERLY CORNER OF SAID LOT 45; THENCE ALONG THE EASTERLY LINE OF SAID LOT 45, SOUTH 00°05'00" WEST, 5.00 FEET TO A POINT ON A LINE PARALLEL WITH AND DISTANT 5.00 FEET SOUTHERLY FROM SAID SOUTHERLY LINE, SAID POINT ALSO BEING ON THE SOUTHEASTERLY CORNER OF THE DEDICATION GRANTED TO THE CITY OF LOS ANGELES, AS SHOWN ON PARCEL MAP NO. 18554 AS FILED IN BOOK 217, PAGES 41 AND 42, OF PARCEL MAPS, IN THE OFFICE OF RECORDER OF SAID COUNTY; THENCE ALONG SAID PARALLEL LINE SOUTH 89°35'00" WEST, 7.46 FEET TO THE BEGINNING OF A NON-TANGENT CURVE, CONCAVE SOUTHWESTERLY HAVING A RADIUS OF 38.00 FEET, A RADIAL LINE TO THE BEGINNING OF SAID CURVE BEARS SOUTH 70°38'51" EAST; THENCE NORTHWESTERLY, ALONG SAID CURVE, THROUGH A CENTRAL ANGLE OF 109°39'21", AN ARC LENGTH OF 72.73 FEET TO A POINT ON A NON-TANGENT LINE, SAID LINE BEING PERPENDICULAR AND MEASURES 4.15 FEET SOUTHERLY FROM THE NORTHERLY LINE OF SAID 118TH STREET; THENCE ALONG SAID PERPENDICULAR LINE NORTH 00°25'00" WEST, 4.15 FEET TO A POINT ON SAID NORTHERLY LINE; THENCE ALONG SAID NORTHERLY LINE NORTH 89°35'00" EAST, 579.33 FEET TO THE SOUTHEASTERLY CORNER OF SAID LOT 32, SAID POINT ALSO BEING THE SOUTHWESTERLY CORNER OF THE ROAD DEED RECORDED JANUARY 7, 1988 AS INSTRUMENT NUMBER 1988-20878, OFFICIAL RECORDS OF SAID COUNTY; THENCE ALONG THE EASTERLY LINE OF SAID LOT 32 NORTH 00°05'00" EAST, 5.00 FEET TO A POINT ON A LINE PARALLEL WITH AND DISTANT 5.00 FEET NORTHERLY OF SAID NORTHERLY LINE; THENCE ALONG SAID PARALLEL LINE NORTH 89°35'00" EAST, 134.04 FEET TO A POINT ON THE EASTERLY LINE OF SAID LOT 33; THENCE ALONG SAID EASTERLY LINE SOUTH 00°05'00" WEST, 5.00 FEET TO THE SOUTHEASTERLY CORNER OF LOT 33; THENCE ALONG SAID NORTHERLY LINE NORTH 89°35'00" EAST, 37.02 FEET TO THE TRUE POINT OF BEGINNING.

END OF DESCRIPTION.

CONTAINING: 37,714 SQUARE FEET, 0.866 ACRES, MORE OR LESS.

SUBJECT TO: ALL COVENANTS, RIGHTS, RIGHTS-OF-WAY, AND EASEMENTS OF RECORD.

EXHIBIT "B": ATTACHED AND BY THIS REFERENCE MADE A PART HEREOF.

PREPARED UNDER THE DIRECTION OF:

02/18/2025

CHRISTOPHER JONES, PLS 8193
chris.jones@kpff.com

LICENSED LAND SURVEYOR
CHRISTOPHER M. JONES
No.8193
STATE OF CALIFORNIA

kpff

700 South Flower St., Suite 2100
Los Angeles, CA 90017
O: 213.418.0201
F: 213.266.5294
www.kpff.com

EXHIBIT "A"
PROPOSED STREET VACATION

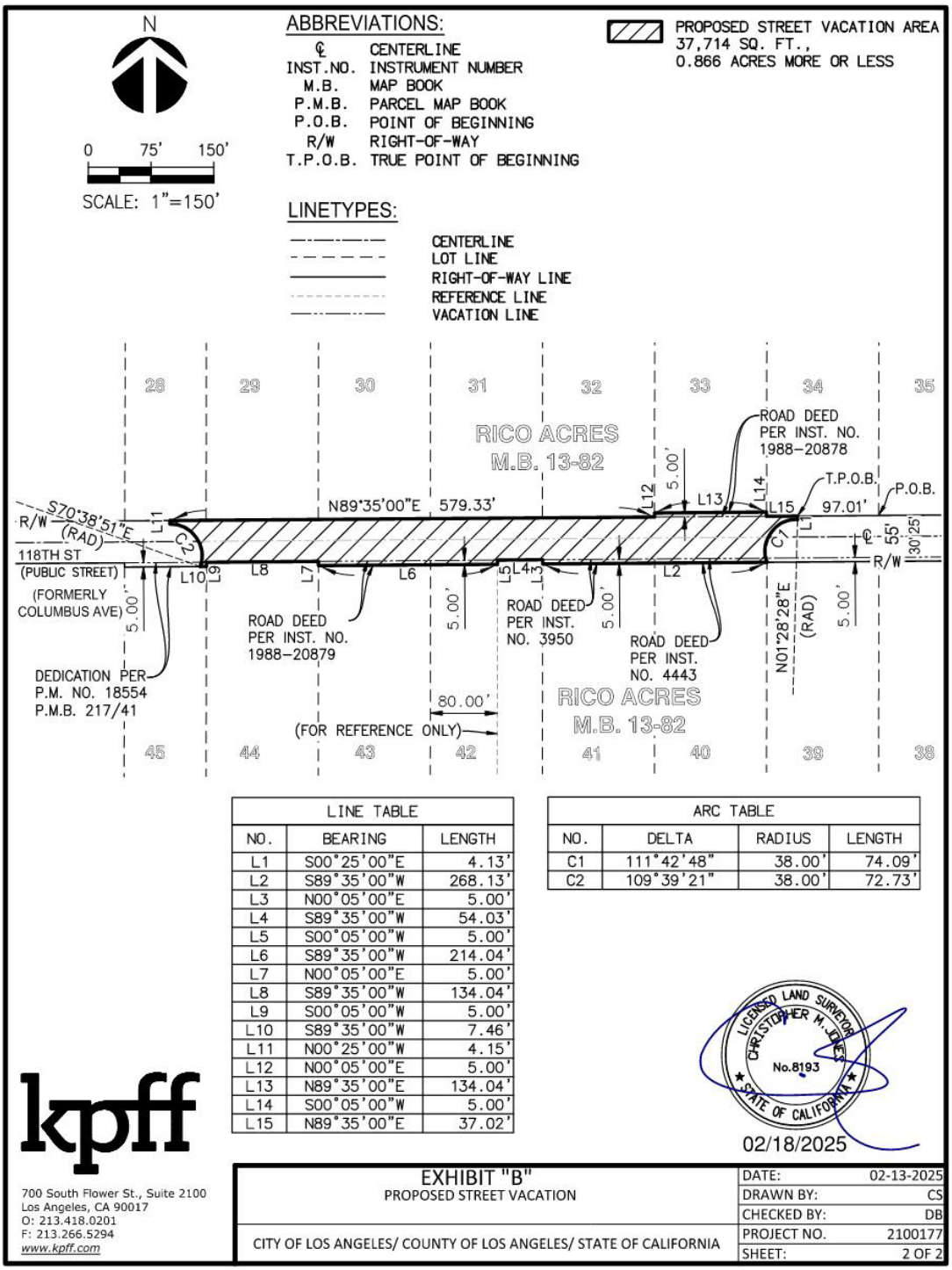
CITY OF LOS ANGELES/ COUNTY OF LOS ANGELES/ STATE OF CALIFORNIA

DATE:	02-13-2025
DRAWN BY:	CS
CHECKED BY:	DB
PROJECT NO.	2100177
SHEET:	1 OF 2

Exhibit I

EXHIBIT L (cont.)

Street Vacation Area



LINE TABLE		
NO.	BEARING	LENGTH
L1	S00°25'00"E	4.13'
L2	S89°35'00"W	268.13'
L3	N00°05'00"E	5.00'
L4	S89°35'00"W	54.03'
L5	S00°05'00"W	5.00'
L6	S89°35'00"W	214.04'
L7	N00°05'00"E	5.00'
L8	S89°35'00"W	134.04'
L9	S00°05'00"W	5.00'
L10	S89°35'00"W	7.46'
L11	N00°25'00"W	4.15'
L12	N00°05'00"E	5.00'
L13	N89°35'00"E	134.04'
L14	S00°05'00"W	5.00'
L15	N89°35'00"E	37.02'

ARC TABLE			
NO.	DELTA	RADIUS	LENGTH
C1	111°42'48"	38.00'	74.09'
C2	109°39'21"	38.00'	72.73'

LICENSED LAND SURVEYOR
CHRISTOPHER M. JEE
No. 8193
STATE OF CALIFORNIA
02/18/2025

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700 South Flower St., Suite 2100
Los Angeles, CA 90017
O: 213.418.0201
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www.kpff.com

EXHIBIT "B"
PROPOSED STREET VACATION

CITY OF LOS ANGELES/ COUNTY OF LOS ANGELES/ STATE OF CALIFORNIA

DATE:	02-13-2025
DRAWN BY:	CS
CHECKED BY:	DB
PROJECT NO.	2100177
SHEET:	2 OF 2

239113679.32
227041-10033

Exhibit J

DRAFT RESOLUTION
REGIONAL PLANNING COMMISSION
COUNTY OF LOS ANGELES
SPECIFIC PLAN AMENDMENT ORDINANCE
PROJECT NO. PRJ2023-002770-(2)
SPECIFIC PLAN AMENDMENT NO. RPPL2023004093

WHEREAS, the Regional Planning Commission ("Commission") of the County of Los Angeles ("County") conducted a duly-noticed public hearing on April 29, 2026 to consider the Specific Plan Amendment Ordinance ("Ordinance"), an amendment to Title 22 (Planning and Zoning) of the Los Angeles County Code ("Title 22") to amend principal use regulations and development standards of the Willowbrook Transit-Oriented District Specific Plan ("Specific Plan") applicable to projects in the Mixed Use 1 ("MU-1") and Mixed Use 2 ("MU-2") Zones and bring the Specific Plan into compliance with current County policies.

WHEREAS, the Commission finds as follows:

1. In accordance with County Code Chapter 22.244 (Ordinance Amendments), the Permittee initiated the Ordinance to effectuate the Specific Plan Amendment by amending the principal use regulations and development standards applicable to the Specific Plan.
2. The Applicant requested amendments to the Specific Plan as part of their entitlements associated with Project No. PRJ2023-002770-(2) in order to allow Charles Drew University ("CDU") to expand their campus to continue to provide quality education to underrepresented medical students.
3. After deeming the application complete in 2023, the County amended the Specific Plan as a part of the Metro Area Plan effort. To ensure that both the version of the Specific Plan in effect at the time the application was deemed complete and the current version are kept in sync, the County proposes that both versions of the Specific Plan be amended concurrently.
4. The proposed amendments requested by the Applicant include adding senior citizen housing as an allowed use, adding student and staff housing as an allowed use, increasing the building height maximum in the MU-2 Zone from 50 feet to 70 feet and allowing 110 feet for parking structures, allowing increased common open space to replace the private open space requirement for student housing, and allowing off-site parking for student/staff housing without a Parking Permit. The amendments build upon existing adopted policies to improve development projects by promoting a high-quality built environment, responding to community and environmental contexts, and equitably supporting all mobility types.
5. The proposed amendments requested by LA County Planning staff to reflect current policies include removing the building stories limits and removing dwelling unit floor area minimums to both the MU-1 and MU-2 zones, and updating the Wireless Telecommunications Facilities land use reference.

Exhibit J

6. The proposed Ordinance is consistent with and supportive of the goals, policies, and principles of the General Plan, including: Policy LU 4.1 to encourage infill development in urban and suburban areas on vacant, underutilized, and/or brownfield sites; Policy ED 4.4 to incentivize infill development in urban and suburban areas that revitalizes underutilized commercial and industrial areas; and Policy LU ED 4.5 to direct resources to economically distressed areas to spur revitalization activities.

7. The proposed Ordinance is consistent with other applicable provisions of Title 22.

8. The proposed Ordinance amends the Specific Plan to facilitate expansion of the CDU campus to house more students, seniors, and do so while minimizing impacts to the existing neighborhood. Approval of the proposed Ordinance will be in the interest of the public health, safety, and general welfare and in conformity with good zoning practice.

9. Pursuant to County Code Section 22.222.120, a public hearing notice was published in one local newspaper of general circulation and public hearing notices were mailed to 146 contacts on LA County Planning's Zoned District Courtesy List and CEQA Courtesy List.

10. An Addendum to the previously certified Final Environmental Impact Report ("EIR") for the Specific Plan (Environment Assessment Number 201500136 and State Clearinghouse Number 2015101106) was prepared for the project in compliance with the California Environmental Quality Act ("CEQA") and the County's environmental guidelines to account for the construction of the project within the Specific Plan. The Addendum concluded that the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects beyond those which were analyzed in the EIR and therefore concluded that supplemental environmental analysis was not required.

11. On April 29, 2026, the Commission conducted a duly-noticed public hearing to **[Reserved for Hearing Proceedings].**

THEREFORE, BE IT RESOLVED THAT the Commission recommends to the County Board of Supervisors as follows:

1. That the Board hold a public hearing to consider the proposed Ordinance;

2. That the Board find that the proposed Ordinance is exempt from the provisions of CEQA for the reasons in the record;

3. That the Board determine that the proposed Ordinance is compatible with and supportive of the goals and policies of the General Plan and in the interest of public health, safety, and general welfare and in conformity with good zoning practice, and consistent with other applicable provisions of Title 22; and

4. That the Board adopt the proposed Ordinance.

Exhibit J

I hereby certify that the foregoing resolution was adopted by a majority of the voting members of the Regional Planning Commission of the County of Los Angeles on April 29, 2026.

_____
Elida Luna, Commission Services
County of Los Angeles
Regional Planning Commission

APPROVED AS TO FORM: OFFICE OF THE COUNTY COUNSEL

By _____
Lisa Jacobs
Deputy County Counsel
County of Los Angeles

Exhibit J

DRAFT RESOLUTION
REGIONAL PLANNING COMMISSION
COUNTY OF LOS ANGELES
DEVELOPMENT AGREEMENT ORDINANCE
PROJECT NO. PRJ2023-002770-(2)
DEVELOPMENT AGREEMENT NO. RPPL2023005669

WHEREAS, the Regional Planning Commission ("Commission") of the County of Los Angeles ("County") conducted a duly-noticed public hearing on April 29, 2026, to consider the Development Agreement Ordinance ("Ordinance") to provide assurance to the Permittee that the applicable regulations for the Project Site will not change within the performance period in exchange for community benefits; and

WHEREAS, the Commission finds as follows:

1. In accordance with County Code ("Title 22") Chapter 22.162 (Development Agreements), the Director of the County Department of Regional Planning ("LA County Planning") worked with the Permittee to establish the Ordinance for recommendation to the County Board of Supervisors ("Board").
2. The build-out of the project includes five affordable housing buildings, four university student/faculty/staff housing buildings, one university office building, one university athletics building, and one parking garage building, with all associated infrastructure, which is a large project that will take a longer timeframe to build out than the typical entitlement. Title 22 allows for the adoption of the Ordinance to provide a longer timeframe than usual for buildout of the project.
3. The proposed Ordinance provides a 30-year term in ensuring timely development of the project through a development schedule ensuring that at least 55% of the university expansion is built within 20 years and that all proposed affordable housing is built within 15 years.
4. The proposed Ordinance assures that various community benefits from the project are codified, including but not limited to: no-cost programming and events; a minimum of 220 and up to 249 affordable housing units at up to 80% Area Median Income; a minimum of 70 and up to 305 units of university housing for faculty, staff, and students; public access to on-campus open space and walking paths during daylight hours; public access to athletics field and facilities during evening hours and weekends; access to meeting spaces within buildings, for local community organizations and stakeholders, during business hours; and local worker hiring programs.
5. The proposed Ordinance requires that the final building designs be reviewed by LA County Planning staff, ensuring that architectural components take the surrounding neighborhood into consideration and create a cohesive urban form.
6. The proposed Ordinance is consistent with and supportive of the goals, policies, and principles of the County General Plan ("General Plan"), including: Policy LU 4.1 to encourage infill development in urban and suburban

Exhibit J

areas on vacant, underutilized, and/or brownfield sites; Policy ED 4.4 to incentivize infill development in urban and suburban areas that revitalizes underutilized commercial and industrial areas; and Policy LU ED 4.5 to direct resources to economically distressed areas to spur revitalization activities.

7. The proposed Ordinance will not increase the allowed density or expand the list of allowed land uses within any zone. Therefore, the proposed Ordinance is consistent with other applicable provisions of Title 22.

8. The proposed Ordinance provides assurance to the Permittee that the project will have enough time to build out with appropriate design review in exchange for community benefits that will enhance the existing community with programs, walking paths, and open space. Approval of the proposed Ordinance will be in the interest of the public health, safety, and general welfare and in conformity with good zoning practice.

9. Pursuant to County Code Section 22.222.120, a public hearing notice was published in one local newspaper of general circulation and public hearing notices were mailed to 146 contacts on LA County Planning's Willowbrook-Enterprise Zoned District Courtesy List and CEQA Courtesy List.

10. An Addendum to the previously certified Final Environmental Impact Report ("EIR") for the Willowbrook Transit-Oriented District Specific Plan ("Specific Plan") (Environment Assessment Number 201500136 and State Clearinghouse Number 2015101106) was prepared for the project in compliance with the California Environmental Quality Act ("CEQA") and the County's environmental guidelines to account for the construction of the project within the Specific Plan. The Addendum concluded that the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects beyond those which were analyzed in the EIR and therefore concluded that supplemental environmental analysis was not required.

11. On April 29, 2026, the Commission conducted a duly-noticed public hearing to **[Reserved for Hearing Proceedings].**

THEREFORE, BE IT RESOLVED THAT the Commission recommends to the Board as follows:

1. That the Board hold a public hearing to consider the proposed Ordinance;

2. That the Board find that the proposed Ordinance is exempt from the provisions of CEQA for the reasons in the record;

3. That the Board determine that the proposed Ordinance is compatible with and supportive of the goals and policies of the General Plan and in the interest of public health, safety, and general welfare and in conformity with good zoning practice, and consistent with other applicable provisions of Title 22; and

4. That the Board adopt the proposed Ordinance.

Exhibit J

I hereby certify that the foregoing resolution was adopted by a majority of the voting members of the Regional Planning Commission of the County of Los Angeles on April 29, 2026.

_____
Elida Luna, Commission Services
County of Los Angeles
Regional Planning Commission

APPROVED AS TO FORM: OFFICE OF THE COUNTY COUNSEL

By _____
Lisa Jacobs
Deputy County Counsel
County of Los Angeles

Exhibit K

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

MARK PESTRELLA, Director

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
http://dpw.lacounty.gov

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

January 15, 2026

IN REPLY PLEASE
REFER TO FILE: LD-4

TO: Michelle Bush
Foothills Development Services
Department of Regional Planning

Attention Bryan Moller

FROM: James Chon
Land Development Division

CONDITIONAL USE PERMIT (RPPL2023004092)
1667 EAST 118TH STREET
ASSESSOR'S MAP BOOK 6149, PAGE 12, PARCEL 901
ASSESSOR'S MAP BOOK 6149, PAGE 14, PARCELS 900, 903, AND 906
UNINCORPORATED WILLOWBROOK

This clearance memo supersedes the memo dated November 26,2025, for Charles Drew University Wellness Center.

The project proposes building four affordable multi-family buildings, one affordable senior housing building, four faculty/student housing buildings, one office building, one athletic facility building, one 8-story parking structure, and one athletic field located at 1667 East 118th Street in unincorporated Willowbrook.

☒ Public Works recommends that the conditions shown below be applied to the project if ultimately approved by the advisory agency.

☐ Public Works has comments on the submitted documents; therefore, a Public Hearing shall NOT be scheduled until the comments have been addressed.

1. Street

1.1. Prior to the issuance of a grading or building permit, submit Street Improvement plans to Public Works, through the EPIC-LA portal under "Public Improvement Plans: Street Plans," that reflect the following for review and approval:

Exhibit K

Be advised that we currently have no known County construction project within the limits of your project. Should a County project be scheduled and constructed ahead of the applicant's development, a pavement moratorium may be imposed that would restrict any pavement work for two years. Exceptions could be made if acceptable rehabilitation measures are provided. The applicant is encouraged to monitor https://pw.lacounty.gov/gmed/lacroads/Find.aspx periodically to determine if any future County projects have been scheduled or to determine whether a pavement moratorium currently exists along streets fronting the project location.

1.1.1. Dedicate additional street right of way for the construction of standard cul-de-sacs with minimum 32-foot radius on East 118th Street.

1.1.2. Permission to vacate the portion of East 118th Street for the proposed promenade.

For questions regarding the street dedication/vacation process, please contact Diego Rivera of Public Works, Land Development Division, at (626) 458-4902 or dirivera@pw.lacounty.gov.

1.1.3. Construct driveway approaches to meet current Americans with Disabilities Act (ADA) guidelines. Use Modified Type C or Type B. The proposed emergency access on the existing cul-de-sac on 117th Place and proposed cul-de-sacs on 118th Street shall be reconstructed as Type-B. Dedicate additional street right of way for Americans with Disabilities Act guidelines, if necessary.

1.1.4. Close all unused driveways along the property frontage with standard curb, gutter, and sidewalk.

1.1.5. Construct standard curb ramps on 117th Street for the mid-block crossings using Caltrans standard A88A. Additional road right of way may be required. The Signing and Striping Plan shall address pedestrian safety for the mid-block crossings.

1.1.6. Provide and maintain 10' x 10' pedestrian sight triangles from all driveways to the back of the sidewalk. This means there shall be no solid structures such as fences, walls, or landscaping more than 3.5 feet high within the pedestrian sight triangles.

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1.1.7. Provide and maintain 4-foot clearance from the top of "X" of all driveway approaches.

1.1.8. Provide a minimum 50-foot setback for all proposed gates. For the gate serving Building A5 on 117th Place, the setback shall be 20 feet. For buildings A1-A4, the setback shall be 30 feet. Driveway approaches identified as emergency access on the approved site plan are exempt from the gate setback requirement.

1.1.9. Construct drainage devices along the property frontage and record a maintenance covenant for private maintenance. Drainage devices shall be directly connected to an existing catch basin where one is present along the street frontage.

1.1.10. Repair or replace all road improvements damaged during construction.

1.1.11. Plant street trees along the property frontage. Contact Public Works, Road Maintenance Division (Maintenance District 241 office), at (323) 261-2160 to obtain the desirable tree species.

1.1.12. Underground all new utility lines less than 50,000 volts.

1.1.13. Permission is granted to provide a red curb between the fire lane and driveway approach on 117th Street and 117th Place. For questions, please contact James Harris of Public Works, Traffic Safety and Mobility Division, at (626) 300-4646 or jharris@pw.lacounty.gov.

1.2. Prior to the issuance of a Certificate of Occupancy, construct all required street improvements.

For questions regarding the street conditions, please contact Kevin Godoy of Public Works, Land Development Division, at (626) 458-5932 or kgodoy@pw.lacounty.gov.

Exhibit K

2. Traffic

2.1. Prior to the issuance of a grading or building permit:

2.1.1. Submit a Signing and Striping Plan, through EPIC-LA under "Engineering Studies: Traffic Conceptual Plan," to Public Works for review and approval. Please note that plans submitted to Regional Planning cannot be initiated for review by Public Works. Submit plans directly to Public Works through EPIC-LA.

2.1.2. Comply with all the mitigations identified in the approved Transportation Impact Analysis.

2.2. Prior to the issuance of a Certificate of Occupancy, comply with all the mitigations identified in the approved Signing and Striping Plan.

For questions regarding the traffic conditions, please contact Mr. Harris of Public Works, Traffic Safety and Mobility Division, at (626) 300-4646 or jharris@pw.lacounty.gov.

3. Grading

3.1. Prior to the issuance of a grading or building permit, provide approval of:

3.1.1. The latest hydrology study by Public Works, Land Development Division (Storm Drain and Hydrology Section).

3.1.2. The grading plan by Public Works, Geotechnical and Materials Engineering Division.

3.1.3. Permits and/or letters of non-jurisdiction from all State and Federal agencies, as applicable. These agencies may include, but may not be limited to, the State of California Regional Water Quality Control Board; State of California Department of Fish and Wildlife; State of California Department of Conservation, California Geologic Energy Management Division (CalGEM); and the Army Corps of Engineers.

3.2. Submit grading plans, through EPIC-LA under "Grading Plan Check: Grading Plan," to Public Works for review and approval. The grading plan must show and call-out the following items including, but not limited to, construction of all drainage devices and details; paved driveways; elevation and drainage of all pads, SUSMP, and LID devices (fill-in whichever is applicable); and any required landscaping and irrigation not within a common area or maintenance easement. Acknowledgement and/or approval from all easement holders may be required.

3.3. The BMP system currently proposed in the hydrology report is not necessarily approved and shall be subject to final engineering review. If the BMP system is found to not meet, satisfy, or conform to Public Works standards or requirements then the applicant is responsible for proposing alternate methods of satisfying the LID requirements. Alternate methods may cause alterations to the project substantial enough that the project may no longer be deemed substantially conforming with the original site plan approval or conditions. If so, the applicant is responsible for processing any required amendments or revisions to the site plan and any related engineering reports to attain substantial conformity.

For questions regarding the grading conditions, please contact Nargiss Majrooh of Public Works, Land Development Division, at (626) 458-7886 or nmajrooh@pw.lacounty.gov.

4. Drainage

4.1. Prior to the issuance of a grading or building permit, comply with the approved hydrology study and LID Plan.

For questions regarding the drainage condition, please contact Isaac Carrera of Public Works, Land Development Division, at (626) 458-4921 or icarrera@pw.lacounty.gov.

5. Sewer

5.1. A Sewer Area Study (PC 12689AS, dated October 29, 2024) was reviewed and approved. No additional mitigation measures are required. The Sewer Area Study shall be invalidated should there be an increase in the total number of dwelling units, an increase in the density, dwelling units occurring on previously identified building restricted lots, a change in the proposed sewer alignment, an increase in the tributary sewer shed, a change in the sewer connection points, or the adoption of a land use plan or a revision to

Exhibit K

the current plan. A revision to the approved Sewer Area Study may be allowed at the discretion of the Director of Public Works. The approved Sewer Area Study shall remain valid for two years from the date of Sewer Area Study approval. After this period of time, an update of the area study shall be submitted by the applicant if determined to be warranted by Public Works.

For questions regarding the sewer condition, please contact Thong Ngov of Public Works, Land Development Division, at (626) 458-4962 or tngov@pw.lacounty.gov.

6. Water

6.1. Prior to the issuance of a Certificate of Occupancy, comply with all the requirements stipulated by the Will Serve letter issued by the water purveyor.

For questions regarding the water condition, please contact Mr. Godoy of Public Works, Land Development Division, at (626) 458-5932 or kgodoy@pw.lacounty.gov.

7. Soils

7.1. Prior to the issuance of a grading or building permit:

7.1.1. Comply with the soils conditions, per the attached Geologic and Geotechnical Engineering review sheet dated March 6, 2024.

7.1.2. Comply with the approved geotechnical report.

For questions regarding the soils conditions, please contact Davis Vo of Public Works, Geotechnical and Materials Engineering Division, at (626) 300-2095 or dvo@pw.lacounty.gov.

8. Streetlighting

8.1. Prior to the issuance of a grading or building permit, comply with the streetlighting conditions per the attached Public Works, Traffic Safety and Mobility Division, memo dated March 5, 2024.

Exhibit K

For questions regarding the streetlighting condition, please contact Sergio Chavez Jr. of Public Works, Traffic Safety and Mobility Division, at (626) 300-4733 or schavez@pw.lacounty.gov.

If you have any questions or require additional information, please contact Milad Hashemi of Public Works, Land Development Division, at (626) 458-7102 or mihashemi@pw.lacounty.gov.

DK:tb
P:\ldpub\SUBPCHECK\Plan\CUP\RPPL2023004092 - 1667 E 118th Street\2026-01-13 Submittal\DPW_Cleared_2026-01-13_RPPL2023004092.docx

Exhibit K

Dist. Office
PCA LX000135
EPIC LA ESTU2023000587
RPPL2023004092
Telephone: (626) 458-4925
Email:
GMEDSubmittals@dpw.lacounty.gov

Los Angeles County Public Works
Geotechnical and Materials Engineering Division

GEOLOGIC AND GEOTECHNICAL ENGINEERING REVIEW SHEET

900 S. Fremont Avenue, Alhambra, CA 91803

Sh

Tract / Parcel Map		**Lot(s)**		**Parent Tract**	
Site Address	1667 E. 118th Street	**Location**	Los Angeles	**APN**	6149-014-900, -903, -904
Geologist	---	**Developer/Owner**	Compton Unified School District		
Soils Engineer	Geotechnologies	**Engineer/Arch.**	Frederick Fisher and Partners		

Review of:

C.U.P. No.: RPPL2023004092 For: CDU Wellness Center w/ 4 affordable FMH bldgs (200 units), 1 senior housing bldg (54 units), 4 market-rate faculty/staff housing bldg (305 units), 1 office bldg (116,000 s.f./5 stories), 1 athletic facilities bldg, 1 athletic field, and 1 8-story parking structure
Submittal Received by GMED: 2/21/24

Geologic Report(s) Dated:
Soils Engineering Report(s) Dated: 11/09/2023, 11/11/21
Geotechnical Report(s) Dated:
References:

Action: The conditional use permit is recommended for approval from a geotechnical standpoint.

At the grading plan stage, submit grading plans and an updated geotechnical report that addresses the latest plans to the Soils Section for verification of compliance with County codes and policies.

NOTE(S) TO THE PLAN CHECKER/BUILDING AND SAFETY ENGINEER:
PER THE SOILS ENGINEER:

A. ON-SITE SOILS ARE IN THE LOW TO MODERATE EXPANSION RANGE. THE EXPANSION INDEX WAS FOUND TO BE BETWEEN 21 AND 64 FOR REPRESENTATIVE BULK SAMPLES.
B. ON-SITE SOILS ARE CORROSIVE TO GENERAL METALS WHEN SATURATED.
C. WITHIN THE PROPOSED BUILDING AREAS, ALL EXISTING FILL AND UPPER NATIVE ALLUVIAL SOILS SHALL BE EXCAVATED TO A MINIMUM DEPTH OF 5 FEET BELOW THE BOTTOM OF THE PROPOSED GRADE, OR 3 FEET BELOW THE BOTTOM OF THE PROPOSED FOUNDATIONS, WHICHEVER IS GREATER. THE EXCAVATION SHALL EXTEND HORIZONTALLY AT LEAST 3 FEET BEYOND THE EDGE OF FOUNDAITONS, OR FOR A DISTANCE EQUAL TO THE DEPTH OF FILL BELOW THE FOUNDATIONS, WHICHEVER IS GREATER.
D. AN AVERAGE BEARING PRESSURE OF 1500 POUNDS PER SQUARE FOOT, WITH LOCALLY HIGHER PRESSURE UP TO 4000 POUNDS PER SQUARE FOOT MAY BE UTILIZED IN THE MAT FOUNDATION DESIGN.
E. THE MAT FOUNDATION MAY BE DESIGNED UTILIZING A MODULUS OF SUBGRADE REACTION OF 175 POUNDS PER CUBIC INCH.

Prepared by

REGISTERED PROFESSIONAL ENGINEER · DAVIS VO · C 94547 · CIVIL · STATE OF CALIFORNIA

Davis Vo
Geotechnical Section

PROFESSIONAL GEOLOGIST · Karin L. Burger · No. 2507 · CERTIFIED ENGINEERING GEOLOGIST · STATE OF CALIFORNIA

Karin Burger
Geology Section

Date 03/06/2024

Please complete a Customer Service Survey at http://dpw.lacounty.gov/go/gmedsurvey
NOTICE: Public safety, relative to geotechnical subsurface exploration, shall be provided in accordance with current codes for excavations, inclusive of the Los Angeles County Code, Chapter 11.48, and the State of California, Title 8, Construction Safety Orders.

Exhibit K

THE PROJECT DOES REQUIRE NEW STREETLIGHTS AND ANNEXATION IS NOT REQUIRED. SEE BELOW FOR FURTHER DETAILS.

Project is in the County Lighting Maintenance District (CLMD) 1687. The CUP project shall conform to the design standards and policies of Public Works, in particular, but not limited to the statements and conditions below:

STREETLIGHT REQUIREMENTS

1. Streetlights shall be provided to the satisfaction of Public Works or as modified by Public Works along property frontage, on Compton Ave.

2. Provide streetlights on new concrete poles with underground wiring. The streetlights shall be designed as a County owned and maintained system.

3. For CUP Projects, Street lighting plans shall be approved prior to issuance of building permits or road construction permits, whichever occurs first.

4. Street lighting improvements shall be installed per approved plans prior to the issuance of a certificate of occupancy.

5. Annexation is not required.

TRANSFER REQUIREMENTS

6. The applicant (property owner or authorized representative) shall be responsible for the operation and maintenance of streetlights along with their associated costs that are installed as a condition of development. The applicant will remain responsible until the streetlights are formally accepted into the County Lighting District for operation and maintenance and their billing is transferred into a County Lighting District account with Southern California Edison.

7. Public Works can assume the responsibility for operation, maintenance, and funding all associated costs of all streetlights installed and transfer the billing when all of the following conditions are met (the transfer of billing may be delayed one or more years if the conditions are not met):

    a. All required streetlights LS-2 in the project have been constructed per Public Works approved street lighting plan, energized, and field accepted.
    b. The County Lighting Districts is receiving revenue from the benefitting properties via the annual property tax bill.
    c. The County have formally accepted the transfer and conveyance of the streetlights. To initiate the process, the applicant must make a written request to schavez@pw.lacounty.gov. Alternatively, the applicant can call (800) 618-7575 to

Exhibit K

make the request over the phone. When completed, Public Works will issue a letter to the developer that the streetlights have been formally accepted.

d. Any underlying road(s) or any associated road improvements have been accepted for public use.

Once the transfer is complete, the County will authorize the release of any remaining bond, if any.

8. Prior to the County accepting the streetlights into the County Highway System to assume the operation and maintenance responsibilities for the streetlights, a final field review will be conducted to ensure all streetlights are installed per approved plans and no knockdowns have occurred at the time of transfer.

9. The County Lighting Districts cannot assume responsibility for streetlights located within gated communities or on roadways designated as a private or private-future street.

Additional Conditions:

10. Comments/Additional Requirements:
None

Prepared by: Sergio Chavez Phone: (626) 300-4733

Date: 03/05/2024

Exhibit K

COUNTY OF LOS ANGELES FIRE DEPARTMENT
FIRE PREVENTION DIVISION

Land Development Unit
5823 Rickenbacker Road
Commerce, CA 90040
Telephone (323) 890-4243, Fax (323) 890-9783

EPIC-LA NUMBER:	RPPL2023004092	PROJECT NUMBER:	CDU Wellness Center @ E 118th St
CITY/COMMUNITY:	Willowbrook	STATUS:	Cleared
PROJECT ADDRESS:	1669 E 117th Street Los Angeles, CA 90059	DATE:	12/17/2025

CONDITIONS

1. The Fire Department recommends approval of the Conditional Use Permit for the Charles Drew University Campus Project as presently submitted at this time. Further review by the Fire Department for compliance will be required prior to building permit issuance.
2. The Fire Apparatus Access Road shall provide a minimum unobstructed width of 28 feet, exclusive of shoulders and an unobstructed vertical clearance “clear to sky” due to the building height exceeding a distance of 30 feet between the fire apparatus access road and the highest roof surface. The Fire Apparatus Access Road shall be located between 10 feet and 30 feet from the building and shall be positioned parallel to one entire side of the building. Fire Code 503.2.1.2.2 & 503.2.1.2.2.1
3. Clearly identify the firefighter walkway access routes leading from the Fire Department Access Road to all required openings in the building's exterior walls for firefighting and rescue purposes on the plan, and indicate the required width of 5 feet. Fire Code 504.1
4. When security gates are provided, maintain a minimum access width of 20 feet (wider gate width maybe required if the gate encroaching into the fire operational area or required fire lane). The security gate shall be provided with an approved means of emergency operation and shall be maintained operational at all times and replaced or repaired when defective. Electric gate operators, where provided, shall be listed in accordance with UL 325. Gates intended for automatic operation shall be designed, constructed and installed to comply with the requirements of ASTM F220. Gates shall be of the swinging or sliding type. Construction of gates shall be of materials that allow manual operation by one person. (Fire Code 503.6). Provide a gate detail for each proposed vehicular gate shown within a fire lane, compliance will be required during the Fire Department review of the architectural plan prior to building permit issuance.
5. Provide a minimum 32-foot centerline turning radius for the Fire Apparatus Access Road. Indicate the centerline, inside and outside turning radii for each change in direction.
   An approved Fire Department turnaround maybe required for dead-end Fire Apparatus Access Road in excess of 150 feet in length. The turnaround shall be oriented on the access roadway in the proper direction of travel.
6. Provide documentation from the utility company indicating the Kilovolt rating of the overhead transmission lines within the lot frontage. Provide a site plan/Exhibit Map showing the overhead transmission lines and indicate the distance to the proposed structures (the closest drip line to the building). Signs that include the words "CAUTION OVERHEAD HIGH-VOLTAGE TRANSMISSION LINES." shall be posted as indicated and approved by the fire code official prior to occupancy. Fire Code 503.3.1
7. Install 9 public fire hydrants as noted by the Fire Department site plan and Utility Plan. All required public fire hydrants shall be installed, tested and accepted prior to beginning construction. All fire hydrants shall measure 6”x 4"x 2-1/2" brass or bronze, conforming to current AWWA standard C503 or approved equal, and shall be installed in accordance with the County of Los Angeles Fire Code. Fire Code 501.4
8. The required fire flow for the public fire hydrants for this project will vary between 2,000 gpm and 4,000gpm due to each building construction type and size. The duration will also vary between 2hrs to 4hrs. A 20 psi residual pressure will remain constant for all public fire hydrants. The Cover Sheet (A1.00) provides the required fire flow for each building, exact fire flow requirement and compliance for each building will be performed during the Fire Department review of the architectural plan review prior to building permit issuance. Fire Code 507.3 & Appendix B

Reviewed by:

Exhibit K

9. Fire department connections (FDC) shall be located on the street-address side of buildings, facing approved fire apparatus access roads, within 150 feet (via vehicular access) of an accessible public fire hydrant, and as close to the street curb face as possible, fully visible, and recognizable from the street, fire apparatus access road or nearest point of fire department vehicle access or as otherwise approved by the fire code official. FDC shall be located a minimum of 25 feet (7,620 mm) from the structure. When this distance cannot be achieved, a minimum two-hour, fire-resistive wall shall be provided for the structure with no openings in the wall, for 25 feet (7,620 mm) in either direction from the FDC. The required fire-resistive construction and lack of openings shall extend for the full height of the wall or building as determined by the fire code official. The fire code official may allow sufficiently protected overhead openings. FDC shall be located not less than 24 inches (609.6 mm) nor more than 42 inches (1,066.8 mm) above grade. Fire Code 912.2.1
   During the building permit review process, provide a verbatim note and show FDC locations on the site plan. Final location of the FDC shall be determine by Sprinkler Unit during the fire sprinkler plan check review process.
10. Building U8 - Shall provide a minimum fire lane width of 20ft on the east and west of the building with an all-weather access surface. An additional staircase, at the middle of the building, is required with direct access from the public street. The building shall be setback a minimum 5ft from the northern property line providing firefighter access around the building.

For any questions regarding the report, please contact Juan Padilla at (323) 890-4243 or Juan.Padilla@fire.lacounty.gov.

Reviewed by:

Exhibit K

PROJECT DIRECTORY

Charles R. Drew University
Carl A. McLaney, Vice President of Administration and Infrastructure
Charles R. Drew University of Medicine and Science
1731 East 120th Street
Los Angeles, California 90059
323.563.4854

Century
Victor Casanova, Development Manager
Century Housing Corporation
1000 Corporate Pointe Walk, #7610
Culver City, California 90230
310. 642.2065

Frederick Fisher & Partners
Nathan Prevendar, Partner
12248 Santa Monica Boulevard
Los Angeles, California 90025
310.820.6680

KPFF
Danny Munsterman, Associate
700 South Flower Street, Suite 2100
Los Angeles, California 90017
213.418.0201

Hood Design Studio
Michael DeGregorio, Principal
3016 Filbert St, #2
Oakland, California 94608
267.254.8017

GENERAL NOTES

3. Community Protection Branch: Environmental Hygiene

Please Note: The following are general requirements for Noise and Air Quality recommendations for the proposed project.

3.1 Noise

3.1.1 The applicant shall abide by the requirements contained in Title 12, Section 12.08, Noise Control Ordinance for the County of Los Angeles (reference available at municode.com). The sections in Title 12 that apply to this project include but are not limited to: 12.08.390 Exterior Noise Standards, 12.08.440 Construction Noise, and 12.08.530 Residential Air-Conditioning.

3.1.2 The proposed project is in close proximity to commercial buildings, and based on the scope of the project, it is anticipated that construction noise will impact the surrounding community.

3.1.2.1 Noise mitigation measures should be applied to the project site to reduce significant impacts related to construction noise and vibration and to comply with Los Angeles County Code Title 12, 12.08.440 – Construction Noise. Applicable noise mitigation strategies may include but are not limited to, the following:

1. Construction shall occur between 7:00 am and 7:00 pm Monday through Saturday. Construction is not allowed on Sundays or federal holidays.
2. All construction equipment shall be equipped with the manufacturers' recommended noise muffling devices, such as mufflers and engine covers. These devices shall be kept in good working condition throughout the construction process.
3. Installation of a temporary sound barrier at the property lines of the proposed project site to mitigate noise impacts on all surrounding residential properties.
4. All construction equipment shall be properly maintained and tuned to minimize noise emissions.
5. Stationary noise sources (e.g., generators and compressors) shall be located as far from residential receptor locations as is feasible.

3.1.3 Construction Noise 12.08.440

Operating or causing the operation of any tools or equipment used in construction, drilling, repair, alteration, or demolition work between weekday hours of 7:00 p.m. and 7:00 a.m., or at any time on Sundays or holidays, such that the sound therefrom creates a noise disturbance across a residential or commercial real-property line, except for emergency work of public service utilities or by variance issued by the health officer is prohibited.

A. Mobile Equipment. Maximum noise levels for nonscheduled, intermittent, short-term operation (less than 10 days) of mobile equipment:

	Single-family Residential	Multi-family Residential	Semi residential/ Commercial
Daily, except Sundays and legal holidays, 7:00 a.m. to 8:00 p.m.	75 dBA	80 dBA	85 dBA
Daily, 8:00 p.m. to 7:00 a.m. and all-day Sunday and legal holidays	60 dBA	64 dBA	70 dBA

B. Stationary Equipment. Maximum noise level for repetitively scheduled and relatively long-term operation (periods of 10 days or more) of stationary equipment:

	Single-family Residential	Multi-family Residential	Semi residential/ Commercial
Daily, except Sundays and legal holidays, 7:00 a.m. to 8:00 p.m.	60 dBA	65 dBA	70 dBA
Daily, 8:00 p.m. to 7:00 a.m. and all day Sunday and legal holidays	50 dBA	55 dBA	60 dBA

3.2 Air Quality Recommendation

3.2.1 During grading or excavation activities if applicable, application of dust control measures to minimize fugitive dust is recommended. Fugitive dust can result in worker and public exposure to fungal spores such as Coccidioides immitis, which can cause Coccidioidomycosis (Valley Fever). Adhere to applicable air quality Air Quality Management District regulations.

For questions regarding Environmental Hygiene, please contact, Makkaphoeum Em, Environmental Hygiene Program at (626) 430-5201 or mem@ph.lacounty.gov.

If you have any other questions or require additional information, please contact Veronica Aranda Public Health, Land Use Program at (626) 430-5201 or varanda@ph.lacounty.gov.



CMWC, LLC

Wellness & Education Campus Plan & Land Use

SITE SUMMARY

NORTH OF 117th STREET:
LOT AREA: 56,614 SQUARE FEET / 1.3 ACRES
BUILDING AREA: 11,500 SQUARE FEET
LOT COVERAGE: 59.3%
FLOOR AREA RATIO: 0.203 / MAX. 3:1

SOUTH OF 117th STREET:
LOT AREA: 502,346 SQUARE FEET / 11.52 ACRES
BUILDING AREA: 798,700 SQUARE FEET
LOT COVERAGE: 39.5%
FLOOR AREA RATIO: 1.589 / MAX. 3:1
RESIDENTIAL UNITS: 559
DENSITY: AFFORDABLE BLDGS. A1-A5 (3.25 ACRES)
60 DWELLING UNITS / ACRE ALLOWED
78.15 DWELLING UNITS / ACRES PROVIDED WITH DENSITY BONUS (254 UNITS)

UNIVERSITY HOUSING: BLDG. U1-U4 (8.28 ACRES)
60 DWELLING UNITS / ACRE ALLOWED
36.83 DWELLING UNITS / ACRES PROVIDED (305 UNITS)

SITE LANDSCAPING:
LOT AREA: 558,960 SQAURE FEET / 12.83 ACRES x 10% = 55,896 SQUARE FEET / 1.28 ACRES REQUIRED

OPEN SPACE:

NON-RESIDENTIAL COMMON OPEN SPACE:
1,000 SF / ACRE =
6.52 ACRES x 1,000 = 6,520 SF REQUIRED
(REF. SHEET L0-06 FOR ADDITIONAL INFORMATION)
AFFORDABLE & SENIOR HOUSING PRIVATE OPEN SPACE:
50 SF / DWELLING UNIT =
254 DWELLING UNITS x 50 SF = 12,700 SF REQUIRED
(REF. SHEET L0-06 FOR ADDITIONAL INFORMATION)
AFFORDABLE & SENIOR HOUSING COMMON OPEN SPACE:
25 SF / DWELLING UNIT =
254 DWELLING UNITS x 50 SF = 6,350 SF REQUIRED
(REF. SHEET L0-06 FOR ADDITIONAL INFORMATION)
TOTAL COMMON OPEN SPACE:
REF. SHEET L0-06 FOR ADDITIONAL INFORMATION
TOTAL SITE LANDSCAPING:
REF. SHEET L0-06 FOR ADDITIONAL INFORMATION
STUDENT & FACULTY HOUSING COMMON & PRIVATE OPEN SPACE:
REF. SHEET L0-06 FOR ADDITIONAL INFORMATION

PLAN CHECK SUBMITTAL WILL INCLUDE BUILDING CONSTRUCTION TYPE, FIRE SPRINKLER SYSTEM TYPE AND FIRE FLOW DATA AND THAT ALL DRAWINGS WILL COMPLY WITH THE REFERENCED CBC, CPC AND FIRE CODE. FIRE CODE 507.3 & APPENDIX B105.1

FIRE SPRINKLER TO BE NFPA 13D - REF. SPRINKLER SYSTEMS SHALL BE DESIGNED AND INSTALLED IN ACCORDANCE WITH SECTION 903.3.1.1, UNLESS OTHERWISE PERMITTED BY SECTIONS 903.3.1.2 AND 903.3.1.3 AND OTHER CHAPTERS OF THIS CODE, AS APPLICABLE. 903.3.1.3 NFPA 13D SPRINKLER SYSTEMS AUTOMATIC SPRINKLER SYSTEMS INSTALLED IN ONE- AND TWO-FAMILY DWELLINGS; GROUP R-3; GROUP R-4

FLOOR AREA SUMMARY

BUILDINGS A1, A2 - AFFORDABLE HOUSING
BUILDING AREA:
LEVEL 1: 7,500 SQUARE FEET
PARKING: 9,166 SQUARE FEET (ACCESORY PARKING)
LEVELS 2-4: 15,000 SQUARE FEET PER FLOOR (45,000 TOTAL)
TOTAL AREA: 61,666 SQUARE FEET
CONSTRUCTION TYPE: TYPE V-A (45,000 SF) OVER TYPE I (7,500 SF + 9,166 SF)
FIRE FLOW (REQ'D): 2,250 GPM W/ NFPA 13 SPRINKLER SYSTEM (4,500 GPM)
UNITS:
LEVEL 1: 2 UNITS
LEVELS 2-4: 15 UNITS PER FLOOR (45 TOTAL)
TOTAL UNITS: 47
50 SF / UNIT OF PRIVATE OUTDOOR SPACE (2,350 SF TOTAL)
PARKING:
A1 (BLDG.) - 24 SPACES PROVIDED
A2 (BLDG.) - 24 SPACES PROVIDED

BUILDINGS A3, A4 - AFFORDABLE HOUSING
BUILDING AREA:
LEVEL 1: 8,300 SQUARE FEET
PARKING: 11,335 SQUARE FEET (ACCESORY PARKING)
LEVELS 2-4: 16,800 SQUARE FEET PER FLOOR (50,400 TOTAL)
TOTAL AREA: 70,035 SQUARE FEET
CONSTRUCTION TYPE: TYPE V-A (50,400 SF) OVER TYPE I (8,300 SF + 11,335 SF)
FIRE FLOW (REQ'D): 2,375 GPM W/ NFPA 13 SPRINKLER SYSTEM (4,750 GPM)
UNITS:
LEVEL 1: 2 UNITS
LEVELS 2-4: 17 UNITS PER FLOOR (51 TOTAL)
TOTAL UNITS: 53
50 SF / UNIT OF PRIVATE OUTDOOR SPACE (2,650 SF TOTAL)
PARKING:
A3 (BLDG.) - 29 SPACES PROVIDED
A4 (BLDG.) - 29 SPACES PROVIDED

BUILDING A5 - AFFORDABLE SENIOR HOUSING
BUILDING AREA:
LEVEL 1: 3,300 SQUARE FEET
PARKING: 10,510 SQUARE FEET (ACCESORY PARKING)
LEVELS 2-4: 13,600 SQUARE FEET PER FLOOR (40,800 TOTAL)
TOTAL AREA: 54,610 SQUARE FEET
CONSTRUCTION TYPE: TYPE V-A (40,800 SF) OVER TYPE I (3,300 SF + 10,510 SF)
FIRE FLOW (REQ'D): 2,125 GPM W/ NFPA 13 SPRINKLER SYSTEM (4,250 GPM)
UNITS:
LEVEL 1: NO UNITS
LEVELS 2-3: 19 UNITS PER FLOOR (38 TOTAL)
LEVEL 4 16 UNITS
TOTAL UNITS: 54
50 SF / UNIT OF PRIVATE OUTDOOR SPACE (2,700 SF TOTAL)
PARKING:
A5 (BLDG.) - 27 SPACES PROVIDED

BUILDING U1 - MARKET RATE STUDENT HOUSING
BUILDING AREA (PARKING AREA NOT INCLUDED):
LEVELS 1-5: 14,100 SQUARE FEET (70,500 TOTAL)
TOTAL AREA: 70,500 SQUARE FEET
CONSTRUCTION TYPE: TYPE V-A (70,500 SF)
FIRE FLOW (REQ'D): 2,500 GPM W/ NFPA 13 SPRINKLER SYSTEM (5,000 GPM)
UNITS:
LEVEL 1: 12 UNITS
LEVELS 2-5: 15 UNITS PER FLOOR (60 TOTAL)
TOTAL UNITS: 72
50 SF / UNIT OF PRIVATE OUTDOOR SPACE (3,600 SF TOTAL)

BUILDING U2 - MARKET RATE STUDENT HOUSING
BUILDING AREA (PARKING AREA NOT INCLUDED):
LEVELS 1-5: 13,500 SQUARE FEET (67,500 TOTAL)
TOTAL AREA: 67,500 SQUARE FEET
CONSTRUCTION TYPE: TYPE V-A (67,500 SF)
FIRE FLOW (REQ'D): 2,375 GPM W/ NFPA 13 SPRINKLER SYSTEM (4,750 GPM)
UNITS:
LEVEL 1: 10 UNITS
LEVELS 2-5: 15 UNITS PER FLOOR (60 TOTAL)
TOTAL UNITS: 70
50 SF / UNIT OF PRIVATE OUTDOOR SPACE (3,500 SF TOTAL)

BUILDING U3 - MARKET RATE STUDENT HOUSING
BUILDING AREA (PARKING AREA NOT INCLUDED):
LEVEL 1: 19,100 SQUARE FEET (INCLUDES 10,270 SF OF RETAIL)
LEVELS 2-5: 19,100 SQUARE FEET PER FLOOR (76,400 TOTAL)
TOTAL AREA: 95,500 SQUARE FEET
CONSTRUCTION TYPE: TYPE V-A (76,400 SF) OVER TYPE I (19,100 SF)
FIRE FLOW (REQ'D): 2,500 GPM W/ NFPA 13 SPRINKLER SYSTEM (5,000 GPM)
UNITS:
LEVEL 1: 0 UNITS
LEVELS 2-5: 27 UNITS PER FLOOR (108 TOTAL)
TOTAL UNITS: 108

BUILDING U4 - MARKET RATE FACULTY/STAFF HOUSING
BUILDING AREA (PARKING AREA NOT INCLUDED):
LEVELS 1-5: 10,950 SQUARE FEET (54,750 TOTAL)
TOTAL AREA: 54,750 SQUARE FEET
CONSTRUCTION TYPE: TYPE V-A (54,750 SF)
FIRE FLOW (REQ'D): 2,125 GPM W/ NFPA 13 SPRINKLER SYSTEM (4,250 GPM)
UNITS:
LEVEL 1: 7 UNITS
LEVELS 2-5: 12 UNITS PER FLOOR (48 TOTAL)
TOTAL UNITS: 55
50 SF / UNIT OF PRIVATE OUTDOOR SPACE (2,750 SF TOTAL)

BUILDING U6
BUILDING AREA (PARKING AREA NOT INCLUDED):
LEVELS 1-2: 31,000 SQUARE FEET
TOTAL AREA: 43,100 SQUARE FEET
CONSTRUCTION TYPE: TYPE II-B
FIRE FLOW (REQ'D): 2,250 GPM W/ NFPA 13 SPRINKLER SYSTEM (4,500 GPM)

BUILDING U7
BUILDING AREA:
SUB-LEVEL: 37,840 SQUARE FEET - ACCESSORY PARKING
LEVELS 1-3: 25,000 SQUARE FEET (75,000 TOTAL)
LEVELS 4-5: 23,000 SQUARE FEET (46,000 TOTAL)
TOTAL AREA: 158,840 SQUARE FEET - BUSINESS OCCUPANCY (OFFICE)
CONSTRUCTION TYPE: TYPE II-B WITH SEPERATION BETWEEN B & S OCCUPANCIES
FIRE FLOW (REQ'D): 4,000 GPM W/ NFPA 13 SPRINKLER SYSTEM (8,000 GPM)
PARKING:
U7 (BLDG.) - 84 SPACES PROVIDED

BUILDING U8
BUILDING AREA (PARKING AREA NOT INCLUDED):
LEVEL 1: 7,000 SQUARE FEET
LEVEL 2: 4,500 SQUARE FEET
PER LEVEL: 33,552 SQUARE FEET
TOTAL AREA: 11,500 SQUARE FEET - BUSINESS OCCUPANCY (OFFICE)
CONSTRUCTION TYPE: TYPE I
FIRE FLOW (REQ'D): 1,000 GPM W/ NFPA 13 SPRINKLER SYSTEM (2,000 GPM)

UNIT/BED SUMMARY

BUILDINGS A1 - AFFORDABLE HOUSING
UNITS:
1 BED - 22 UNITS
2 BED - 12 UNITS
3 BED - 13 UNITS
TOTAL UNITS: 47

BUILDINGS A2 - AFFORDABLE HOUSING
UNITS:
1 BED - 22 UNITS
2 BED - 12 UNITS
3 BED - 13 UNITS
TOTAL UNITS: 47

BUILDINGS A3 - AFFORDABLE HOUSING
UNITS:
1 BED - 24 UNITS
2 BED - 16 UNITS
3 BED - 13 UNITS
TOTAL UNITS: 53

BUILDINGS A4 - AFFORDABLE HOUSING
UNITS:
1 BED - 24 UNITS
2 BED - 16 UNITS
3 BED - 13 UNITS
TOTAL UNITS: 53

BUILDING A5 - AFFORDABLE SENIOR HOUSING
UNITS:
1 BED - 53 UNITS
2 BED - 1 UNITS
TOTAL UNITS: 54

BUILDING U1 - MARKET RATE STUDENT HOUSING
UNITS:
1 BED - 35 UNITS
2 BED - 28 UNITS
3 BED - 9 UNITS
TOTAL UNITS: 72

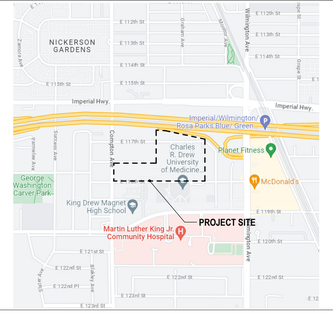
BUILDING U2 - MARKET RATE STUDENT HOUSING
UNITS:
1 BED - 40 UNITS
2 BED - 15 UNITS
3 BED - 15 UNITS
TOTAL UNITS: 70

BUILDING U3 - MARKET RATE STUDENT HOUSING
UNITS:
1 BED -
2 BED -
TOTAL UNITS: 108

BUILDING U4 - MARKET RATE FACULTY/STAFF HOUSING
UNITS:
1 BED - 30 UNITS
2 BED - 15 UNITS
3 BED - 10 UNITS
TOTAL UNITS: 55

NOTE: ALL AFFORDABLE UNITS DESIGNATED FOR LOWER-INCOME HOUSEHOLD

VICINITY MAP



SHEET INDEX

00.1 - ARCHITECTURE	
A1.00	COVER SHEET
A1.01	SITE PLAN
A1.02	FIRE ACCESS SITE PLAN
A1.03	OVERALL SITE RENDERINGS
A4.01	SITE SECTION & ELEVATIONS
A4.02	SITE SECTION & ELEVATIONS
A4.03	SITE SECTION & ELEVATIONS
A4.04	SITE SECTION & ELEVATIONS
01 - ARCHITECTURAL SET - BLDG A1	
A1-A1.1	PLANS
A1-A4.1	BUILDING ELEVATIONS
02 - ARCHITECTURAL SET - BLDG A2	
A2-A1.1	PLANS
03 - ARCHITECTURAL SET - BLDG A3	
A3-A1.1	PLANS
04 - ARCHITECTURAL SET - BLDG A4	
A4-A1.1	PLANS
05 - ARCHITECTURAL SET - BLDG A5	
A5-A1.1	PLANS
A5-A4.1	BUILDING ELEVATIONS
06 - ARCHITECTURAL SET - BLDG U1	
U1-A1.1	PLANS
07 - ARCHITECTURAL SET - BLDG U2	
U2-A1.1	PLANS
U2-A4.1	BUILDING ELEVATIONS
08 - ARCHITECTURAL SET - BLDG U3	
U3-A1.1	PLANS
U3-A5.1	BUILDING ELEVATIONS
09 - ARCHITECTURAL SET - BLDG U4	
U4-A1.1	PLANS
U4-A4.1	BUILDING ELEVATIONS
10 - ARCHITECTURAL SET - BLDG U6	
U6-A1.1	PLANS
U6-A4.1	BUILDING ELEVATIONS
11 - ARCHITECTURAL SET - BLDG U7	
U7-A1.1	PLANS
U7-A1.2	PLANS
U7-A4.1	BUILDING ELEVATIONS
12 - ARCHITECTURAL SET - BLDG U8	
U8-A1.1	PLANS
U8-A1.2	PLANS
U8-A1.3	PLANS
U8-A1.4	PLANS
U8-A5.1	BUILDING ELEVATIONS
U8-A5.2	BUILDING ELEVATIONS
13 - ARCHITECTURAL SET - RESIDENTIAL UNIT PLANS	
A0.3.1	UNIT PLANS
A0.3.2	UNIT PLANS
CIVIL	
C1.00	EXISTING CONDITIONS (FOR REFERENCE ONLY)
C1.00E	EXISTING CONDITIONS (FOR REFERENCE ONLY)
C1.20	DEMOLITION PLAN
C1.30	GRADING PLAN
C1.30G	GRADING PLAN
C1.40	UTILITY PLAN
C1.40C	UTILITY PLAN
C1.40D	UTILITY PLAN
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L0-01	OVERALL SITE PLAN
L0-02	TREE PLANTING PLAN
L0-03	MATERIALS PLAN
L0-04	PLANTING PLAN
L0-05	BICYCLE PARKING LAYOUT PLAN
L0-06	OPEN SPACE REQUIREMENTS PLAN

CMWC, LLC

21001.00

1667 EAST 18TH STREET
LOS ANGELES, CALIFORNIA 90059

Frederick Fisher and **Partners**
12248 Santa Monica Blvd.
Los Angeles, CA 90025

ISSUED FOR	DATE
1 SITE PLAN - RESUBMITTAL II	09/17/2024
2 SITE PLAN - RESUBMITTAL III	01/27/2025
3 SITE PLAN - RESUBMITTAL IV	03/27/2025
4 SITE PLAN - RESUBMITTAL V	07/01/2025
5 SITE PLAN - RESUBMITTAL VI	11/05/2025

COVER SHEET

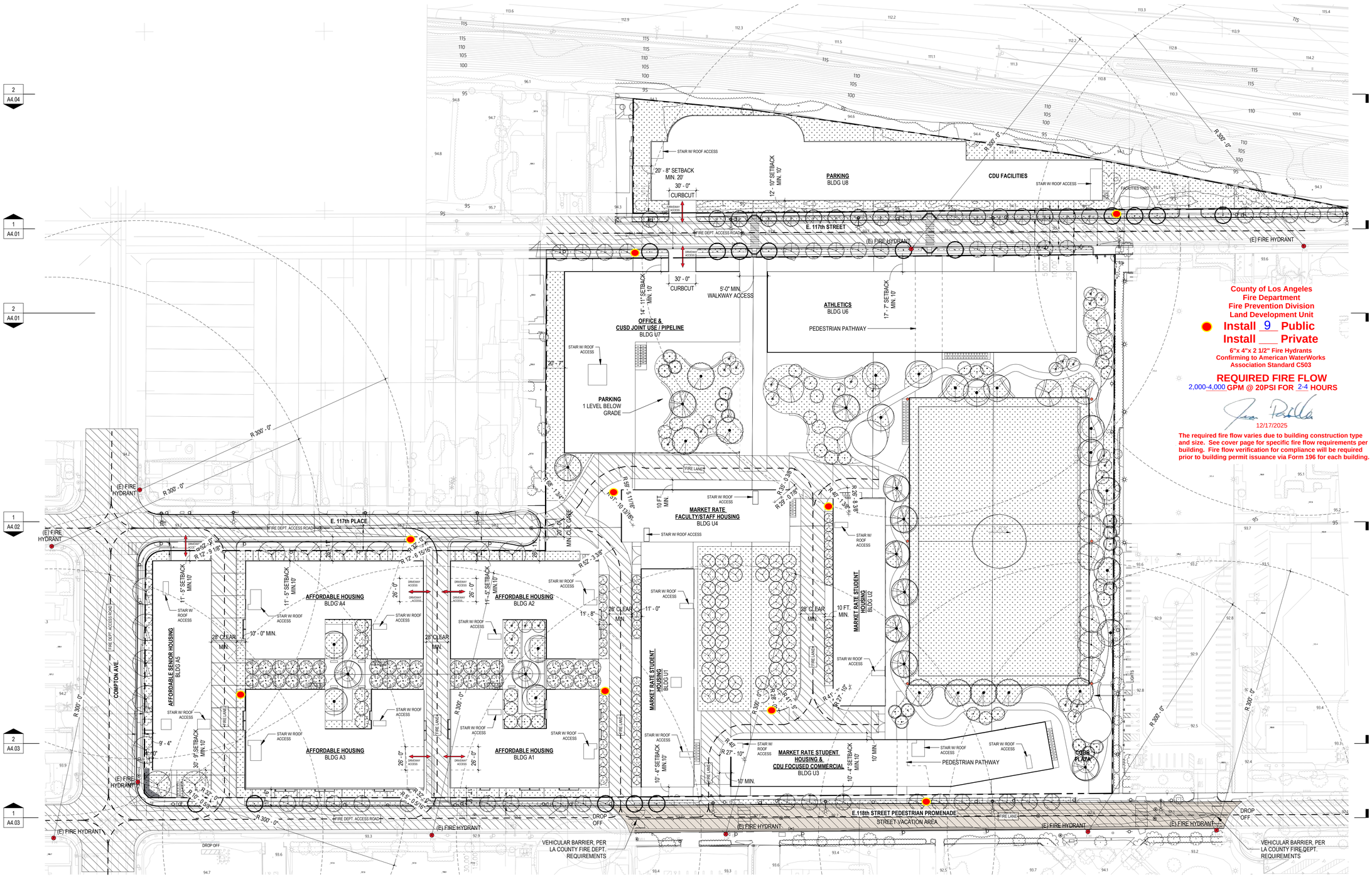
SCALE: 12" = 1'-0"

A1.00

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Exhibit K

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County of Los Angeles
Fire Department
Fire Prevention Division
Land Development Unit

Install 9 Public
Install ___ Private

6"x 4"x 2 1/2" Fire Hydrants
Confirming to American WaterWorks Association Standard C503

REQUIRED FIRE FLOW
2,000-4,000 GPM @ 20PSI FOR 2-4 HOURS

12/17/2025

The required fire flow varies due to building construction type and size. See cover page for specific fire flow requirements per building. Fire flow verification for compliance will be required prior to building permit issuance via Form 196 for each building.

NOTES

A. THE FIRE APPARATUS ACCESS ROAD SHALL PROVIDE A MINIMUM UNOBSTRUCTED WIDTH OF 28 FEET, EXCLUSIVE OF SHOULDERS AND AN UNOBSTRUCTED VERTICAL CLEARANCE "CLEAR TO SKY" DUE TO THE BUILDING HEIGHT EXCEEDING A DISTANCE OF 30 FEET BETWEEN THE FIRE APPARATUS ACCESS ROAD AND THE HIGHEST ROOF SURFACE. THE FIRE APPARATUS ACCESS ROAD SHALL BE LOCATED BETWEEN 10 FEET AND 30 FEET FROM THE BUILDING AND SHALL BE POSITIONED PARALLEL TO ONE ENTIRE SIDE OF THE BUILDING. FIRE CODE 503.2.1.2.2 & 503.2.1.2.2.1
B. DEAD-END FIRE APPARATUS ACCESS ROADS IN EXCESS OF 150 FEET IN LENGTH SHALL BE PROVIDED WITH AN APPROVED FIRE DEPARTMENT TURNAROUND. FIRE CODE 503.2.5
C. ALL FIRE HYDRANTS SHALL MEASURE 6"X 4"X 2-1/2" BRASS OR BRONZE, CONFORMING TO CURRENT AWWA STANDARD C503 OR APPROVED EQUAL, AND SHALL BE INSTALLED IN ACCORDANCE WITH THE COUNTY OF LOS ANGELES FIRE CODE.
D. OVERHEAD POWER LINES AT THE FRONTAGE OF BUILDINGS GREATER THAN 30' IN HEIGHT, WITH NO SHOWN ON-SITE ACCESS, MUST BE PLACED UNDERGROUND DUE TO THE OBSTRUCTION CREATED FOR LADDERING OPERATIONS. NO PROPOSED BUILDINGS MEET THIS REQUIREMENT
E. 504.1 REQUIRED ACCESS - EXTERIOR DOORS AND OPENINGS REQUIRED BY THIS CODE OR THE CALIFORNIA BUILDING CODE SHALL BE MAINTAINED READILY ACCESSIBLE FOR EMERGENCY ACCESS BY THE FIRE DEPARTMENT. AN APPROVED ACCESS WALKWAY LEADING FROM FIRE APPARATUS ACCESS ROADS TO EXTERIOR OPENINGS SHALL BE PROVIDED WHERE REQUIRED BY THE FIRE CODE OFFICIAL.
F. PROVIDE A MINIMUM 32-FOOT CENTERLINE TURNING RADIUS FOR THE FIRE APPARATUS ACCESS ROAD. INDICATE THE CENTERLINE, INSIDE AND OUTSIDE TURNING RADII FOR EACH CHANGE IN DIRECTION, ON THE PLAN. FIRE CODE 503.2.4
G. FIREFIGHTER WALKWAY ACCESS ROUTES LEADING FROM THE FIRE DEPARTMENT ACCESS ROAD TO ALL REQUIRED OPENINGS IN THE BUILDING'S EXTERIOR WALLS FOR FIREFIGHTING AND RESCUE PURPOSES ON THE PLAN, ARE REQUIRED WIDTH OF 5 FEET MIN. FIRE CODE 504.1
H. WHEN SECURITY GATES ARE PROVIDED, MAINTAIN A MINIMUM ACCESS WIDTH OF 20 FEET. THE SECURITY GATE SHALL BE PROVIDED WITH AN APPROVED MEANS OF EMERGENCY OPERATION AND SHALL BE MAINTAINED OPERATIONAL AT ALL TIMES AND REPLACED OR REPAIRED WHEN DEFECTIVE. ELECTRIC GATE OPERATORS, WHERE PROVIDED, SHALL BE LISTED IN ACCORDANCE WITH UL 325. GATES INTENDED FOR AUTOMATIC OPERATION SHALL BE DESIGNED, CONSTRUCTED AND INSTALLED TO COMPLY WITH THE REQUIREMENTS OF ASTM F220. GATES SHALL BE OF THE SWINGING OR SLIDING TYPE. CONSTRUCTION OF GATES SHALL BE OF MATERIALS THAT ALLOW MANUAL OPERATION BY ONE PERSON. (FIRE CODE 503.6)

1 FIRE ACCESS SITE PLAN
SCALE: 1" = 50'-0"

N

CMWC, LLC

21001.00

1667 EAST 18TH STREET
LOS ANGELES, CALIFORNIA 90059

Frederick Fisher and Partners
12248 Santa Monica Blvd.
Los Angeles, CA 90025

CHARLES R. DREW UNIVERSITY OF MEDICINE AND SCIENCE — CDU

CENTURY

ISSUED FOR	DATE
1 SITE PLAN - RESUBMITTAL II	09/17/2024
2 SITE PLAN - RESUBMITTAL III	01/27/2025
3 SITE PLAN - RESUBMITTAL IV	03/27/2025
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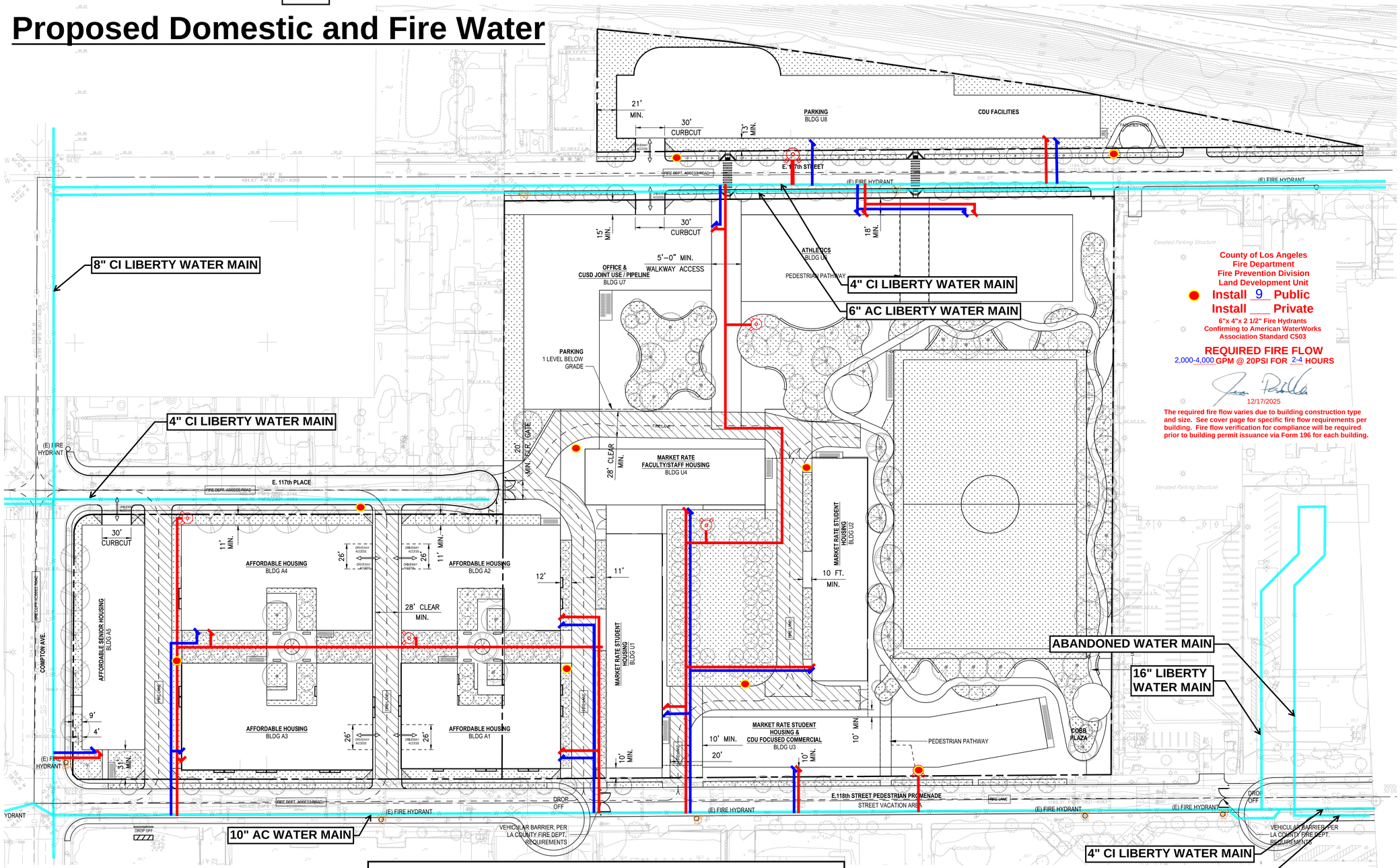
FIRE ACCESS SITE PLAN

SCALE: As indicated

A1.02

Exhibit K

Proposed Domestic and Fire Water



County of Los Angeles
Fire Department
Fire Prevention Division
Land Development Unit

Install 9 Public
Install ___ Private

6"x 4"x 2 1/2" Fire Hydrants
Confirming to American WaterWorks
Association Standard C503

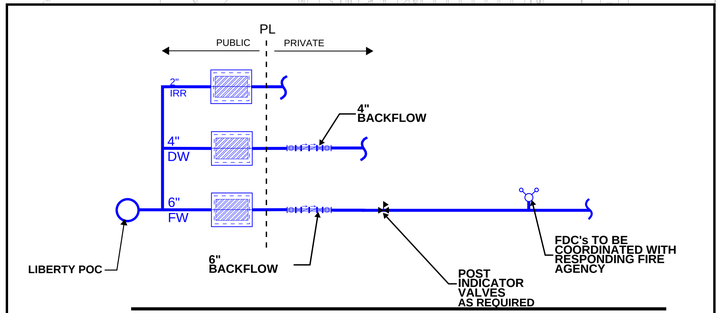
REQUIRED FIRE FLOW
2,000-4,000 GPM @ 20PSI FOR 2-4 HOURS

12/17/2025

The required fire flow varies due to building construction type and size. See cover page for specific fire flow requirements per building. Fire flow verification for compliance will be required prior to building permit issuance via Form 196 for each building.

LEGEND

- EXISTING WATER LINE
- 4" OR 6" PROPOSED DOMESTIC WATER LINE
- 6" PROPOSED FIRE WATER LINE
- 6" EXISTING FIRE HYDRANT
- 6" PROPOSED FIRE HYDRANT
- 4" EXISTING FIRE HYDRANT



DETAIL 1 - TYPICAL WATER METER LAYOUT

N

0 25' 50'

SCALE: 1"=50'

P:\2021\21001\76 Willowbrook Wellness Ctr North Campus\5 CAD\Sheets\21001\76-C1.40UT.dwg, Nov 07, 2025 - 11:37am

CMWC, LLC

21001.00

1667 EAST 18TH STREET
LOS ANGELES, CALIFORNIA 90059

Frederick Fisher and Partners
12248 Santa Monica Blvd.
Los Angeles, CA 90025

ISSUED FOR	DATE
1 SITE PLAN - RESUBMITTAL II	11/05/2025

REGISTERED PROFESSIONAL ENGINEER
CHRISTOPHE N. BORNHOFT
No. C85228
Exp. 3/31/27
CIVIL
STATE OF CALIFORNIA

kpff
700 South Flower Street
Suite 2100
Los Angeles, CA 90017
O: 213.418.0201
www.kpff.com

UTILITY PLAN

C1.40D