

Addendum to
Step by Step Los Angeles County:
Pedestrian Plans for Unincorporated
Communities Final Mitigated Negative
Declaration

DRAFT

August 17, 2023

1. Overview

This document constitutes an Addendum to the Final Mitigated Negative Declaration (Final MND) originally prepared for *Step by Step Los Angeles County: Pedestrian Plans for Unincorporated Communities* (Step by Step). This Addendum is prepared in compliance with the California Environmental Quality Act (CEQA) of 1970, Public Resources Code Section 21000, et seq., as amended, and implementing *CEQA Guidelines*, Title 14, Chapter 3, Section 15000, et seq. of the California Code of Regulations. The Addendum assesses whether amending the adopted Step by Step framework to add four additional Community Pedestrian Plans to the existing four, and other minor technical revisions, herein referred to as the “Project,” would cause environmental impacts that were not identified by the Final MND for the 2019 Step by Step project. More specifically, this Addendum determines whether and to what extent the Final MND is sufficient to address and to mitigate Project impacts.

2. Project Title

Step by Step Los Angeles County: Pedestrian Plans for Unincorporated Communities

3. Lead Agency Name and Address

Los Angeles County Department of Public Health
3530 Wilshire Blvd., Suite 800
Los Angeles, CA 90010

4. Contact Person and Phone Number

Justin L. Robertson, AICP
Senior Planner
Policies for Livable, Active Communities (PLACE) Program
Division of Chronic Disease & Injury Prevention
(213) 351-7330

5. Project Location

Los Angeles County stretches along 75 miles of the Pacific coast of Southern California. It is bordered to the south by Orange County, to the east by San Bernardino County, to the north by Kern County, and to the west by Ventura County. Los Angeles County includes two offshore islands: Santa Catalina Island and San Clemente Island. The Project includes infrastructure and program proposals specific to four unincorporated communities: East Los Angeles, East Rancho Dominguez, Florence-Firestone, and Willowbrook/West Rancho Dominguez-Victoria. Each is within the highly urbanized Metro Planning Area and adjacent to various highways, including Interstates 5, 10, 105, 110, and 710; and State Routes 60 and 91. Minor updates to the framework would apply to all unincorporated areas. See **Figure 1**.

Figure 1



6. Statutory Authority

CEQA recognizes that between the date an environmental document for a project is completed and the date that project is implemented fully, one or more of the following changes may occur: 1) the project may change; 2) the environmental setting in which the project is set may change; and/or 3) previously unknown information can arise. Before proceeding with a project, CEQA requires the lead agency to evaluate these changes to determine whether they affect the conclusions in the prior environmental document.

When an MND has been adopted and a project is modified or otherwise changed afterwards, additional CEQA review may be necessary. The key considerations in determining the need for the appropriate type of additional CEQA review are outlined in 15162, 15163, and 15164 of the CEQA Guidelines. Pursuant to Section 15164(a) of the CEQA Guidelines, an Addendum to an MND may be prepared by the lead agency that adopted the original MND if some changes or additions to the project have become necessary, but none of the conditions have occurred that require preparation of a Subsequent MND as described in Section 15162(a) of the CEQA Guidelines. An addendum must include a brief explanation of the agency's decision not to prepare a Subsequent MND and must be supported by substantial evidence in the record as a whole (Section 15164[e]). The addendum to the MND need not be circulated for public review, but it may be included in or attached to the Final MND (Section 15164[c]). The decision-making body must consider the addendum and the MND prior to acting on the project (Section 15164[d]).

7. Background

On March 29, 2018, the County sent letters via email, postal mail, or both where such information was available, to tribes on a list provided by the state Native American Heritage Commission per SB 18 (2004) and well as to those on the County's AB 52 (2014) noticing list maintained by the Department of Regional Planning. The letters informed recipients of the opportunity to consult on *Step by Step Los Angeles County: Pedestrian Plans for Unincorporated Communities* (Step by Step), and included a project description and map of the project area. Following Tribal Consultation, the County drafted an IS/MND reflective of that process and incorporating public and confidential mitigation measures relative to Tribal Cultural Resources. A Notice of Public Hearing and Intent to Adopt a Mitigated Negative Declaration was prepared and mailed in accordance with Section 22.222.120 of the Los Angeles County Code; and was posted by the Los Angeles County Registrar-Recorder/County Clerk (RR/CC) for Step by Step for 30 days beginning on February 25, 2019 through close of business on March 27, 2019. Full-color, community-tailored postcards noting the availability of the project and IS/MND online and at County libraries were mailed to approximately 20,000 property owners in the four Community Pedestrian Plan communities, as well as trustee agencies and approximately 230 stakeholders on the Department of Regional Planning's courtesy notification list. The notice was also published in the Los Angeles Times, La Opinión, and Antelope Valley Press newspapers on March 4, 2019; and in the Whittier Daily News on March 5, 2019. Concurrently, on February 28, 2019, the draft IS/MND and a Notice of Completion for Step by Step were received by the State Clearinghouse (SCH# 2019029151). On September 3, 2019, the Los Angeles County Board of Supervisors adopted *Step by Step* and the associated IS/MND and Mitigation Monitoring and Reporting Program (MMRP). A Notice of Determination was submitted to the State Clearinghouse on September 4, 2019 and posted by the RR/CC from September 5, 2019 to October 7, 2019. No significant impacts were identified in the Initial Study (IS) that could not be reduced to less-than-significant levels. The IS/MND provided environmental analysis at a programmatic level for the countywide Step by Step framework and four Community Pedestrian Plans for unincorporated areas, as the policy and procedural proposals were not site-specific, and proposed infrastructure improvements were conceptual in nature. Information and technical

analyses from the IS/MND are referenced throughout this Addendum. The entire Step by Step framework, first four Community Pedestrian Plans, and the Final MND and MMRP are available for review online at <http://file.lacounty.gov/SDSInter/bos/supdocs/140062.pdf>.

8. Project Description

Step by Step Los Angeles County: Pedestrian Plans for Unincorporated Communities (Step by Step), adopted in 2019, is a sub-element within the Mobility Element, and an implementation program, of the County of Los Angeles' *General Plan 2035*. Step by Step provides a framework for countywide pedestrian policies, procedures, and programs, and includes Community Pedestrian Plans with conceptual infrastructure and non-infrastructure program proposals for four unincorporated communities: Lake Los Angeles, Walnut Park, West Whittier-Los Nietos, and Westmont/West Athens.

Through the implementation of capital projects, policies, and programs that support and encourage more walking trips identified in the Community Pedestrian Plans and the countywide framework, the County seeks to:

- Provide a pedestrian network that supports people of all ages and abilities, with priority given to the needs of the most vulnerable pedestrians;
- Reduce the number of vehicle trips thereby reducing greenhouse gas (GHG) emissions and improving air quality;
- Improve public health by facilitating physical activity as part of transportation and recreation trips;
- Support the local economy through improvements to the pedestrian environment in business and commercial areas;
- Improve community quality of life through projects and programs that provide increased access to key community destinations and offer aesthetic improvements, public art opportunities, and support overall civic and social engagement; and
- Improve safety by reducing pedestrian traffic collisions, particularly those result in fatalities and severe injuries, and improving personal safety and security within unincorporated communities.

As explained in the Final MND, the framework is to be amended as resources allow to incorporate Community Pedestrian Plans for the remaining 120+ unincorporated communities. The Project would amend the existing framework to add Community Pedestrian Plans for the following four unincorporated communities:

East Los Angeles is an unincorporated community in southeast Los Angeles County with roughly 120,000 residents in approximately 7.4 square miles, amongst the densest in the County. The community is bordered by the City of Los Angeles to the west and north, the Cities of Monterey Park and Montebello to the east, and the City of Commerce to the south. East Los Angeles is served by numerous transit routes, include the Metro L (Gold) Line light rail, which has multiple stations within the community that generate pedestrian activity. The largest of the four communities in the Project, East Los Angeles features numerous local and regional destinations, such as East Los Angeles College, historic Whittier Boulevard, and Belvedere Community Regional Park and Lake.

East Rancho Dominguez is a small 0.81 square-mile unincorporated community in southern Los Angeles County, surrounded by the City of Compton on all sides. The community is home to roughly 15,800 residents and is predominantly residential, offering a dense suburban style of living. Atlantic Avenue and Compton Boulevard are active local commercial corridors that offer retail, restaurants, and other services to residents, and feature East Rancho Dominguez Park.

Florence-Firestone is a densely-populated, diverse unincorporated community in southern Los Angeles

County with a population of roughly 70,000. The community, which is 3.5 square miles, is bordered by the City of Huntington Park and unincorporated Walnut Park to the east, and the City of Los Angeles to north, west, and south. The Metro A (Blue) Line light rail runs through the center of the community; its three stations in Florence-Firestone are popular walking destinations.

The Willowbrook/West Rancho Dominguez-Victoria area consists of the unincorporated communities of Willowbrook and West Rancho Dominguez-Victoria in southern Los Angeles County. Together, the communities cover just over three square-miles and are home to approximately 41,600 residents. The area is a mix of residential and industrial neighborhoods with key destinations such as Willowbrook/Rosa Parks Metro light rail station and Earvin “Magic” Johnson Recreation Area. Willowbrook/West Rancho Dominguez-Victoria is bordered by the City of Los Angeles to the north and west, the cities of Compton and Carson to the south, and the City of Lynwood to the east.

Building on data collection by the project team and a comprehensive participatory planning process, the four new Community Pedestrian Plans identify barriers to accessibility and connectivity; propose enhancements to the public right-of-way that can encourage walking for work, school, and recreation; and aim to save lives in these communities that have experienced high rates of traffic collisions involving pedestrians.

The Project also includes other minor technical revisions to Step by Step’s front matter and Chapters 1, 2, and 5, as well as the addition of new appendices documenting outreach and public input, detailed data analyses, and additional collision analyses for the four new Plans, as described below.

Chapter 1: Background and Context

Chapter 1 of the countywide framework provides a summary of the Plan, background for the planning process, and the Plan’s intended purpose. The Project would revise this chapter to incorporate references to the four new Community Pedestrian Plans, as listed above, other minor technical updates to collision and health outcome statistics, and the policy context for the new proposals, including referencing the 2019 adoption of *Vision Zero Los Angeles County: A Plan for Safer Roadways* (Action Plan).

The Action Plan guides the County’s efforts on reducing traffic deaths and severe injuries on unincorporated County roadways through 2025. The Action Plan identifies Collision Concentration Corridors for unincorporated areas, half-mile segments of County-maintained roads with the highest concentrations of traffic collisions in which people were killed or severely injured. Each community included in the Project features multiple Collision Concentration Corridors, addressed further below.

Chapter 2: Vision, Goals, and Actions

Chapter 2 of the countywide framework describes the vision for walking countywide and proposed actions the County could take or is already taking to achieve the vision presented in the Plan. New or updated actions added to Chapter 2 include references to relevant new state laws and relevant County policies and actions adopted by the Board of Supervisors since the Plan’s adoption in 2019.

Chapter 5: Programmatic Proposals

Chapter 5 of the countywide framework proposes programs to support walking. The Project would add a 10th program describing the County’s existing Vision Zero initiative; and include other minor technical revisions to the chapter.

Infrastructure Project Proposals

Within the Community Pedestrian Plans, pedestrian safety projects are proposed for four unincorporated community areas: East Los Angeles, East Rancho Dominguez, Florence-Firestone, and Willowbrook/West Rancho Dominguez-Victoria. Projects are proposed communitywide, with consideration given to each community's Collision Concentration Corridors and key destinations such as schools, parks, and transit. The implementation of these proposals is contingent upon environmental analysis, as well as future engineering review to ensure consistency with applicable County guidelines and practices, including, but not limited to, the California Manual on Uniform Traffic Control Devices (CA MUTCD), Caltrans Highway Design Manual, Los Angeles County Code, and the Los Angeles County General Plan. Additionally, installation/ construction of the proposed projects, fulfillment of actions, and implementation of programs described in the plans are contingent upon available resources, right-of-way, sufficient funding to finance installation, operation, and on-going maintenance, and obtaining community and political support.

Proposed projects include:

- Crossing Enhancements: Facilities that enhance crossings at intersections and mid-block, including continental crosswalks, advance yield markings, curb extensions, pedestrian-activated flashing beacons, pedestrian signals, and pedestrian refuge islands.
- Traffic Calming: Corridor or intersection improvements on residential streets such as curb extensions, curb corner radii reduction, traffic circles, or roundabouts that help to slow vehicle speeds, discourage cut-through traffic, and deter donuts and street takeovers, thereby enhancing pedestrian safety.
- New/Upgraded Signals: These include new traffic signals to facilitate pedestrian crossings, as well as modifications to signal timing to improve the pedestrian walk experience.
- Increased Accessibility: Installing ADA-compliant curb ramps to improve access for pedestrians of all ages and abilities.
- Sidewalk/Path Improvements: Facilities that enhance the safety and comfort of those walking down the street, including new or widened sidewalks; removing, closing, or reducing driveways; shared-use paths; buffering along paths to discourage vehicle incursion; and upgrading existing overpasses, public stairways, and alleys.
- Lighting: Installation of pedestrian-scale lighting along sidewalks to increase visibility for people walking and provide a sense of personal safety.
- Street Trees: Planting of street trees provides shade that improves pedestrian comfort during warm weather, enhances corridor aesthetics, and has environmental benefits.
- Transit Stops: Improvements to existing bus stops, such as bus shelters, and bus bulbs to provide additional space for people walking.
- Public Space: Provision of new public gathering spaces, such as pocket parks, for people of all ages to interact, play, rest, and more.
- Green Alleys: Green alleyways use sustainable materials and drainage features to create public spaces that also help manage stormwater.
- Future Study: Streets and conditions of varying complexity that need to be studied to determine what enhancements may be considered to enhance the pedestrian experience. These may include pedestrian-scale lighting, shade trees, roadway reconfiguration, landscaping, or other enhancements at a corridor level.

9. Other Public Agencies Whose Approval is Required (e.g., Permits, Financing Approval, or Participation Agreement)

Los Angeles County is the lead agency with responsibility for approving the Project. Approval from other public agencies is not required.

10. Environmental Checklist Analysis within the Addendum EIR

For a proposed modified project, State CEQA Guidelines (Sections 15162 and 15164) provide that an Addendum to an adopted MND may be prepared if only minor technical changes or additions are necessary or none of the following conditions calling for the preparation of a subsequent MND have occurred:

- Substantial changes in the project which require major revisions to the MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- Substantial changes with respect to the circumstances under which the project is undertaken which require major revisions to the MND 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 of MND adoption, shows any of the following:
 1. The project will have one or more significant effects not discussed in the MND,
 2. The project will result in impacts substantially more severe than those disclosed in the MND,
 3. 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 proponent declines to adopt the mitigation measure or alternative, or
 4. Mitigation measures or alternatives that are considerably different from those analyzed in the MND would substantially reduce one or more significant effects on the environment, but the project proponent declines to adopt the mitigation measure or alternative.

As stated in “Overview” above, the purpose of this Addendum is to evaluate the proposed amendments to Step by Step, and to determine whether they would cause potentially significant environmental impacts that were not previously considered by the Final MND, and whether existing mitigation measures are still adequate to reduce significant impacts to less than significant levels. The following evaluation considers the potential impacts of the Project at a programmatic level, including conceptual infrastructure project proposals. Each future specific project implemented under these plans will require separate future environmental review, as required by CEQA. Based on the analysis below, an Addendum to the Final MND is the appropriate CEQA document.

Documents Incorporated by Reference

Step by Step Los Angeles County: Pedestrian Plans for Unincorporated Communities and Initial Study/Mitigated Negative Declaration and MMRP (adopted September 2019), available at <http://file.lacounty.gov/SDSInter/bos/supdocs/140062.pdf> (accessed June 9, 2022).

Evaluation of Environmental Impacts

The following impact evaluation generally follows the CEQA Guidelines Appendix G as set forth in the 2019 Step by Step IS/MND and condenses the discussion into paragraphs, rather than strictly following the checklist format. All mitigation measures from the Final MND and MMRP are hereby incorporated by reference and included where applicable.

Aesthetics

The Project would amend Step by Step as adopted to add Community Pedestrian Plans for four additional unincorporated communities, and other minor technical updates. Impacts to aesthetics were analyzed beginning on page 17 of the Final MND and were determined to be Less Than Significant or have No Impact, and did not include mitigation measures. Compared to Step by Step as adopted, new infrastructure proposals in the Project are also primarily at-grade street improvements such as signage, signing, and sidewalk and curb modifications within the existing public roadway network. These features would primarily be installed within existing paved roadway rights-of-way. Proposed features within existing paved roadway rights-of-way would be visually compatible with the existing transportation infrastructure (i.e., traffic signage, roadway striping) and the urbanized land use context and visual character of each area. Enhancements to overcrossings, undercrossings, stairways, and walkways are proposed for East Los Angeles that could include lighting improvements, wayfinding, handrails, landscaping, public art, and maintenance; and would improve, rather than degrade, the area's visual character. The nature and content of any public art enhancements are not specified or otherwise suggested. New or revised policies and program proposals provide for consistency with applicable laws, policies, and programs adopted or implemented since 2019. Proposed changes do not involve new significant impacts or substantially more severe impacts than Step by Step as adopted; there are no new circumstances involving significant impacts or substantially more severe impacts; and there is no new information requiring no new analysis or verification. New impacts would be less than significant, and no new mitigation measures are required.

Agriculture and Forestry Resources

Impacts to agriculture and forestry resources were analyzed beginning on page 19 of the Final MND, and were determined to have No Impact and did not include mitigation measures. Compared to Step by Step as adopted, new infrastructure and policy/program proposals in the Project are also for existing urbanized areas, within the rights-of-way of existing roadways, or for developed portions of rural areas where no forest/timberland, agricultural uses, or farmland exists. Proposed changes do not involve new significant impacts or substantially more severe impacts than Step by Step as adopted; there are no new circumstances involving significant impacts or substantially more severe impacts; and there is no new information requiring new analysis or verification. No new impacts would occur and no mitigation measures are required.

Air Quality

Impacts to air quality were analyzed beginning on page 21 of the Final MND and were determined to be Less Than Significant With Mitigation Measures Incorporated or have No Impact. Compared to Step by Step as adopted, new infrastructure proposals in the Project are made for communities within the South Coast Air Quality Management District (SCAQMD), and new or revised policies and program proposals could apply to communities within the Antelope Valley AQMD (AVAQMD). By proposing new and improved pedestrian facilities, the Project supports an alternate mode of travel to the automobile, which is intended to reduce motor vehicle traffic and associated GHG and pollutant emissions, and improve regional air quality. As a result, the Project's proposals are considered to have a beneficial air quality impact and support local air quality goals. However, construction activities associated with

implementation of individual infrastructure proposals could cause short-term emissions of criteria air pollutants. *Mitigation Measure MM 3.3-1* in the Final MND ensures that new short-term construction-related air quality impacts are reduced to a less than significant level. No new mitigation measures are required.

Mitigation Measure (MM) 3.3-1: If, during subsequent project-level environmental review, construction-related criteria air pollutants are determined to have the potential to exceed the applicable Air Quality Management District (AQMD) adopted thresholds of significance, the Los Angeles County Department of Regional Planning¹ shall require that applicants for new development projects incorporate mitigation measures as identified in the CEQA document prepared for the project to reduce air pollutant emissions during construction activities. Mitigation measures that may be identified during the environmental review include but are not limited to:

- Using construction equipment rated by the United States Environmental Protection Agency as having Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits, applicable for engines between 50 and 750 horsepower.
- Ensuring construction equipment is properly serviced and maintained to the manufacturer's standards.
- Limiting nonessential idling of construction equipment to no more than five consecutive minutes.
- Water all active construction areas at least three times daily, or as often as needed to control dust emissions. Watering should 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 should be used whenever possible.
- Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least two feet of freeboard (i.e., the minimum required space between the top of the load and the top of the trailer).
- Pave, apply water three times daily or as often as necessary to control dust, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas at construction sites.
- Sweep daily (with water sweepers using reclaimed water if possible), or as often as needed, all paved access roads, parking areas, and staging areas at the construction site to control dust.
- Sweep public streets daily (with water sweepers using reclaimed water if possible) in the vicinity of the project site, or as often as needed, to keep streets free of visible soil material.
- Hydroseed or apply non-toxic soil stabilizers to inactive construction areas.
- Enclose, cover, water three times daily, or apply non-toxic soil binders to exposed stockpiles (dirt, sand, etc.).

Biological Resources

Impacts to biological resources were analyzed beginning on page 23 of the Final MND and were determined to be Less Than Significant With Mitigation Measures Incorporated or have No Impact. Compared to Step by Step as adopted, proposals in the Project are generally minor alterations to existing roadways such as signage, striping, curb and gutter, and sidewalk within urbanized areas, and would not affect sensitive or special status biological resources. No new infrastructure proposals are proposed for potentially sensitive natural areas or undeveloped parcels. New impacts would be less than significant, and no new mitigation measures are required.

¹ In the Final MND, this read "County of Los Angeles Planning Department" in error, and has been corrected here,

MM 3.4-1: Biological resources shall be analyzed on a project-specific level by a qualified biological consultant. A general survey shall be conducted to characterize the project site, and focused surveys should be conducted as necessary to determine the presence/absence of special-status species (e.g., focused sensitive plant or wildlife surveys). For proposed discretionary projects within SEAs, a biological resources assessment report shall be prepared to characterize the biological resources on-site, analyze project-specific impacts to biological resources, and propose appropriate mitigation measures to offset those impacts. The report shall include site location, literature sources, methodology, timing of surveys, vegetation map, site photographs, and descriptions of biological resources on-site (e.g., observed and detected species as well as an analysis of those species with potential to occur onsite).

MM 3.4-2: If there is potential for direct impacts to special-status species with implementation of construction activities, the project-specific biological resources assessment report (as mentioned in Mitigation Measure 3.4-1) shall include mitigation measures requiring preconstruction surveys for special-status species and/or construction monitoring to ensure avoidance, relocation, or safe escape of special-status species from the construction activities, as appropriate. If special-status species are found to be nesting, brooding, denning, etc. on-site during the pre-construction survey or monitoring, construction activity shall be halted until offspring are weaned, fledged, etc. and are able to escape the site or be safely relocated to appropriate offsite habitat areas. Relocations into areas of appropriate restored habitat would have the best chance of replacing/incrementing populations that are lost due to habitat converted to development. Relocation to restored habitat areas should be the preferred goal of this measure. A qualified biologist shall be on site to conduct surveys, to perform or oversee implementation of protective measures, and to determine when construction activity may resume.

Cultural Resources

Impacts to cultural resources were analyzed beginning on page 27 of the Final MND and were determined to be Less Than Significant or Less Than Significant With Mitigation Measures Incorporated. Compared to Step by Step as adopted, new infrastructure proposals in the Project, including those resulting from new or revised policies/procedures, are primarily located within existing roadway rights-of-way in highly urbanized areas that do not contain known historic, archaeological, or paleontological resources, or human remains; and no proposals would directly demolish or materially alter such resources. However, where implementation of Project proposals could lead to the discovery of cultural resources, the Final MND notes that compliance with the goals, policies, and implementation measures of the General Plan 2035 would reduce impacts through project-level compliance procedures as specified in the General Plan, Title 22 of the County Code, and state and federal regulations restricting alteration, relocation, and demolition of cultural resources; as well as through implementation of Final MND *Mitigation Measures 3.5-1 and 3.5-2*, which would ensure that all potential impacts related to unknown archaeological and paleontological resources are reduced to a less than significant level. No new mitigation measures are required.

MM 3.5-1: Prior to the issuance of any grading permit, applicants shall provide written evidence to the County of Los Angeles that a County-certified archaeologist has been retained to observe grading activities greater than six feet in depth and salvage and catalogue archaeological resources as necessary. The archaeologist shall be present at the pre-grade conference, shall establish procedures for archaeological resource surveillance, and shall establish, in cooperation with the applicant, procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of the artifacts as appropriate. If the archaeological resources are found to be significant, the archaeological observer shall determine appropriate actions, in cooperation with the project applicant, for exploration and/or salvage. Prior to the release of the grading bond the applicant shall obtain approval of the archaeologist's follow-up report from the County. The report shall include the period of

inspection, an analysis of any artifacts found and the present repository of the artifacts. Applicant shall prepare excavated material to the point of identification.

Applicant shall offer excavated finds for curatorial purposes to the County of Los Angeles, or its designee, on a first refusal basis. These actions, as well as final mitigation and disposition of the resources, shall be subject to the approval of the County. Applicant shall pay curatorial fees if an applicable fee program has been adopted by the Board of Supervisors, and such fee program is in effect at the time of presentation of the materials to the County or its designee, all in a manner meeting the approval of the County. Unanticipated discoveries shall be evaluated for significance by a County-certified archaeologist. If the archaeological resources are found to be significant, then the project shall be required to perform data recovery, professional identification, radiocarbon dates as applicable, and other special studies; submit materials to the California State University Fullerton; and provide a comprehensive final report including appropriate records for the California Department of Parks and Recreation (Building, Structure, and Object Record; Archaeological Site Record; or District Record, as applicable).

MM 3.5-2: Prior to the issuance of any grading permit, applicants shall provide written evidence to the County of Los Angeles that a County-certified paleontologist has been retained to observe grading activities greater than six feet in depth and salvage and catalogue paleontological resources as necessary. The paleontologist shall be present at the pre-grade conference, shall establish procedures for paleontologist resource surveillance, and shall establish, in cooperation with the applicant, procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of the artifacts as appropriate. If the paleontological resources are found to be significant, the paleontologist observer shall determine appropriate actions, in cooperation with the project applicant, for exploration and/or salvage. Prior to the release of the grading bond the applicant shall obtain approval of the paleontologist's follow-up report from the County. The report shall include the period of inspection, an analysis of any artifacts found and the present repository of the artifacts. Applicant shall prepare excavated material to the point of identification.

Applicant shall offer excavated finds for curatorial purposes to the County of Los Angeles, or its designee, on a first refusal basis. These actions, as well as final mitigation and disposition of the resources, shall be subject to the approval of the County. Applicant shall pay curatorial fees if an applicable fee program has been adopted by the Board of Supervisors, and such fee program is in effect at the time of presentation of the materials to the County or its designee, all in a manner meeting the approval of the County. Unanticipated discoveries shall be evaluated for significance by a County-certified a paleontologist. If the paleontological resources are found to be significant, then the project shall be required to perform data recovery, professional identification, radiocarbon dates as applicable, and other special studies; submit materials to the California State University Fullerton; and provide a comprehensive final report including appropriate records for the California Department of Parks and Recreation.

Energy

Impacts associated with energy were analyzed beginning on page 29 of the Final MND and were determined to have No Impact; and did not include mitigation measures. Compared to Step by Step as adopted, specific infrastructure projects proposed by the Project, including those resulting from new or revised policies/procedures, are pedestrian improvements involving minor alterations to existing roadways such as signage, striping, curb and gutter, and sidewalk. No new building construction is proposed, thereby avoiding conflicts with the Los Angeles County Green Buildings Standards Code, and new infrastructure proposals in the project are limited to passive facilities that generally do not require

ongoing energy to operate outside of construction and routine maintenance (i.e., sweeping, etc.). Where pedestrian-scale lighting is proposed, implementation of lighting projects in the public right-of-way would comply with Los Angeles County Public Works current standards for high-efficiency lighting using Light Emitting Diodes and avoid the inefficient use of energy resources. No impacts would occur, and no mitigation measures are required.

Geology and Soils

Impacts associated with geology and soils were analyzed beginning on page 31 of the Final MND and were determined to be Less Than Significant or have No Impact; and did not include mitigation measures. Compared to Step by Step as adopted, the Project includes proposals for Willowbrook/West Rancho Dominguez-Victoria, portions of which are within the Newport-Inglewood-Rose Canyon Fault Zone, a designated Alquist-Priolo Zone. However, the Project does not propose any new structures for human occupancy, and there would be no impacts related to active fault rupture. Strong seismic shaking is a risk throughout Southern California, but areas proposed for infrastructure enhancements or non-infrastructure programs are not at greater risk of seismic activity or impacts than other areas. For any structural features such as stairways or walkways identified in the Project, adherence to County engineering specifications and standards, as applicable, would ensure a Less Than Significant impact related to seismic shaking. Although liquefaction zones have been mapped within each of the Project communities, future development of at-grade pedestrian safety enhancements as described would not result in increased risk of or exposure to liquefaction or other seismic-related ground failures. Structural elements such as bus or shade shelters would be required to meet appropriate County engineering specifications and standards as applicable, thereby reducing seismic hazards related to liquefaction and other seismic ground failure to a Less Than Significant level. Project proposals are within existing developed community areas, and therefore would not expose people to any additional risk from landslides. Infrastructure proposals are entirely within paved roadway rights-of-way. The largest source of erosion and topsoil loss, particularly in a developed environment, is uncontrolled drainage during construction. All applicable water quality Best Management Practices will be used to prevent topsoil from entering the storm drain system. Projects requiring earthwork would require site-specific soils analysis as part of the design phase and would be constructed in accordance with all County regulations designed to minimize construction-related erosion. The Project would not involve the use of any septic systems. No hillside development is proposed. New impacts would be less than significant, and no new mitigation measures are required.

Greenhouse Gas Emissions

Impacts associated with Greenhouse Gas Emissions (GHGs) were analyzed on page 34 of the Final MND and were determined to have No Impact; and did not include mitigation measures. Compared to Step by Step as adopted, the Project also recommends constructing new or improved pedestrian facilities, thereby encouraging alternate mode of travel to the automobile, which is intended to reduce motor vehicle traffic and associated GHG emissions. As a result, the Plans' proposals are considered to have a beneficial GHG impact and support state and local GHG reduction goals. No impacts would occur, and no mitigation measures are required.

Hazards and Hazardous Materials

Impacts associated with hazards and hazardous materials were analyzed beginning on page 35 of the Final MND were determined to be Less Than Significant or have No Impact; and did not include mitigation measures. Compared to Step by Step as adopted, the Project includes new infrastructure proposals, including those resulting from new or revised policies/procedures, and are at-grade pedestrian improvements involving minor alterations to existing roadways such as signage, striping, and

curb and gutter, and sidewalk, and which themselves do not result in any routine storage, transport, use, release, or emission of hazardous materials. Construction or routine maintenance activities may involve short-term use of hazardous materials such as paints, solvents, and asphalt that may be hazardous. While no known hazardous sites are included in specific project proposals, due to the countywide nature of the plan it is possible that a recommendation to redevelop an already developed parcel may encounter a site included on a list of hazardous materials sites compiled pursuant to Government Section 65962.5, known as a Cortese List. However, compliance with applicable existing regulations and processes would ensure that the Project would not result in a significant hazard to the public or the environment from future development on existing hazardous materials sites; and construction activities associated with implementation of proposed infrastructure improvements would be short term, subject to all regulations of such materials, and would not use these materials in large enough quantities to cause adverse effects. Infrastructure proposals, if implemented, will be used by pedestrians; they will have no impacts on operation or safety of any nearby airports, and if vehicular routes are impassible, would provide evacuation routes for pedestrians and others using non-motorized travel modes. No proposed facilities are located within a Very High Fire Hazard Severity Zone, within a high fire hazard area, include new structures subject to fire flow standards, nor are they proximate to land uses with the proximity for dangerous fire hazards. Rather, proposed facilities are for transportation and recreation by pedestrians and would not create a fire hazard. New impacts would be Less Than Significant, and no new mitigation measures are required.

Hydrology and Water Quality

Impacts to hydrology and water quality were analyzed beginning on page 38 of the Final MND and were determined to be Less Than Significant or have No Impact; and did not include mitigation measures. Compared to Step by Step as adopted, specific infrastructure projects proposed by the Plan, including those resulting from new or revised policies/procedures, are pedestrian improvements involving minor alterations to existing roadways such as signage, striping, curb and gutter, and sidewalk. In Florence-Firestone, a “green alley” is proposed in the alley between Bandera Street and Elm Street from Firestone Boulevard and 92nd Street. While specific design details are yet to be determined, such projects are intended to result in water quality improvements; while also enhancing aesthetics through visible features such as landscaping and permeable pavers. Where individual projects proposed in the Project would include any construction near existing surface waters, detailed analysis of impacts related to surface water quality will be required prior to their implementation. As these Community Pedestrian Plans are programmatic in nature and design details and feasibility are unknown at this time, any future development requiring discretionary approval would be subject to separate project-level environmental review in accordance with CEQA. However, detailed analysis of impacts related to floodways, floodplains, or designated flood hazard zones will be required as part of project-specific implementation where applicable and may include drainage studies that will calculate additional flows per County hydrology manual standards. Short-term construction impacts to surface water quality could occur from grading and other construction-related activities (e.g., erosion, spills, leaks from construction equipment). However, individual projects would be subject to permitting requirements and Best Management Practices (BMPs) of the Los Angeles (Region 4) Regional Water Quality Control Board (RWQCB) where applicable, ensuring that impacts on water quality during construction are less than significant; and proposed projects would comply with existing regulations for avoiding or minimizing erosion and sedimentation where applicable, as well as existing regulations limiting stormwater discharge, applicable NPDES permits, and the County LID Ordinance. Although some proposed enhancements could introduce new impervious surfaces if implemented, such as the addition or extension of new concrete sidewalks where only dirt pathways currently exist, all proposals are within previously developed areas and dispersed over a network of paved roadway rights-of-way, and any new runoff would be minimal; they would not result in loss of pervious surfaces such that groundwater

recharge is meaningfully affected; and no project proposals would substantially alter existing drainage patterns resulting in substantial erosion or siltation. In Florence-Firestone, a proposed “green alley” could introduce new permeable surfaces and other BMPs if implemented, retaining stormwater and allowing for infiltration and groundwater recharge, thereby reducing the transport of pollutants in stormwater and helping to reduce peak storm flows. Implementation of the Project would not require significant use or extraction of groundwater. No water features or infrastructure that would accumulate standing water are currently proposed; and any such features proposed during project-specific design would be subject to all applicable County codes and water quality regulations to limit mosquito habitat and pesticide use. All proposals are within highly urbanized areas with adequate stormwater drainage systems to accommodate new runoff from the proposed minor roadway alterations and none would provide substantial additional sources of polluted runoff. No wastewater would be generated by proposed projects, and no wastewater treatment systems are proposed. No new housing is proposed. No new pedestrian enhancements would place substantial numbers of people or structures at risk of flooding in 100-year flood zones, nor are any proposed within areas that would be subject to inundation by seiche, tsunami, or mudflow. New impacts would be Less Than Significant, and no new mitigation measures are required.

Land Use and Planning

Impacts associated with land use and planning were analyzed beginning on page 42 of the Final MND and were determined to be Less Than Significant or have No Impact; and did not include mitigation measures. Like Step by Step as adopted, the Project would not physically divide an established community; rather, the proposed pedestrian enhancements are intended to increase access, walkability, civic engagement, and connectivity within the existing pedestrian network through improvements such as new or widened sidewalks, pedestrian-scale lighting, and marked crosswalks. The Project would amend the General Plan consistent with and in support of existing County policies and plans, and the new Plans include specific discussions of relevant plans and projects with which its proposals are consistent, including land use, zoning, parks, and other relevant plans. The Project does not involve rezoning or changing land use designations, and proposed enhancements are limited to the public right-of-way, precluding any inconsistency with the County zoning ordinance. No new parks, plazas, trails, or other enhancements are proposed in places that would require additional zoning approvals. No proposals are within any Hillside Management Areas or Significant Ecological Areas. New impacts would be Less Than Significant, and no new mitigation measures are required.

Mineral Resources

Impacts to mineral resources were analyzed on page 43 of the Final MND and were determined to have No Impact; and did not include mitigation measures. Compared to Step by Step as adopted, all infrastructure proposals in the Project, including those resulting from new or revised policies/procedures, would involve minor alterations to existing roadways within urbanized areas, such as signage, striping, curb and gutter, and sidewalk. Projects involving earthwork do not involve grading activities similar to mining; and would not result in the loss of availability of a known mineral resource. No impacts would occur, and no mitigation measures are required.

Noise

Impacts from noise were analyzed beginning on page 44 of the Final MND and were determined to be Less Than Significant with Mitigation Incorporated, Less Than Significant, or have No Impact. Compared to Step by Step as adopted, levels of temporary and permanent noise or vibration generated by additional people walking due to widened sidewalks, crosswalk striping, signage, and other proposals in the Project, would not exceed ambient levels and therefore have no impact; no new parking areas are

proposed; and noise generated by use of pedestrian enhancements proposed within two miles of a public airport or private airstrip would have no impact on airport operations. Construction of newly proposed projects could result in short-term noise and groundborne vibration impacts on adjacent land uses. Maximum construction noise would still be short-term, generally intermittent depending on the construction phase, and variable depending on receiver distance from the active construction zone. Construction activities would again be subject to the County's noise ordinance and regulations limiting hours and days of construction work, and impacts would still be less than significant. Final MND Mitigation Measures *MM 3.13-1* and *3.13-2* would ensure that all potential impacts related to construction noise and vibration from implementing proposed projects in the new Plans remain at a less than significant level. No new mitigation measures are required.

MM 3.13-1: Construction activities associated with new development that occurs near sensitive receptors shall be evaluated for potential noise impacts. Mitigation measures such as installation of temporary sound barriers for construction activities that occur adjacent to occupied noise-sensitive structures, equipping construction equipment with mufflers, and reducing non-essential idling of construction equipment to no more than five minutes shall be incorporated into the construction operations to reduce construction-related noise to the extent feasible.

MM 3.13-2: Individual projects that use vibration-intensive construction activities, such as pile drivers, jack hammers, and vibratory rollers, near sensitive receptors shall be evaluated for potential vibration impacts. If construction-related vibration is determined to be perceptible at vibration-sensitive uses (i.e., exceed the Federal Transit Administrations vibration annoyance criterion of 78 VdB at sensitive receptor locations), additional requirements, such as use of less vibration-intensive equipment or construction techniques, shall be implemented during construction (e.g., drilled piles to eliminate use of vibration-intensive pile driver).

Population and Housing

Impacts related to population and housing were analyzed on page 47 of the Final MND and were determined to have No Impact; and did not include mitigation measures. Compared to Step by Step as adopted, the Project also does not include proposals for new housing or businesses that would induce population growth. The Project's implementation would not result in the removal or displacement of any existing housing or populations, would not require construction of replacement housing elsewhere, and would not increase regional or local population. Enhancements proposed by the Plans, including those resulting from new or revised policies, are pedestrian improvements involving minor alterations to existing roadways such as signage, striping, curb and gutter, and sidewalk. No impacts would occur, and no mitigation measures are required.

Public Services

Impacts to public services were analyzed beginning on page 48 of the Final MND and were determined to be Less Than Significant or have No Impact; and did not include mitigation measures. As previously noted, the Project would not induce population growth in the area. Implementation of newly proposed pedestrian enhancements would not result in the need for new or expanded fire protection, sheriff protection, schools, parks, libraries, or other public facilities. Compared to Step by Step as adopted, newly proposed enhancements could also result in an incremental increase in use of public facilities such as parks and libraries due to increased access for pedestrians. However, physical deterioration or overuse of those facilities as a result of enhanced pedestrian safety and access are not expected. Proposed enhancements intended to ensure pedestrian safety could reduce service demands of public safety agencies, including roadway safety enhancements and pedestrian-scale lighting; and the new

Plans have been reviewed and cleared without concerns by the Los Angeles County Fire Department. No new employment-generating facilities are proposed, thereby having no impact on school capacity. New impacts would be Less Than Significant, and no new mitigation measures are required.

Recreation

Impacts to recreation facilities were analyzed on page 50 of the Final MND and were determined to be Less Than Significant or have No Impact; and did not include mitigation measures. Compared to Step by Step as adopted, specific infrastructure projects proposed in the Project, including those resulting from new or revised policies/procedures, are pedestrian improvements involving minor alterations to existing roadways such as signage, striping, curb and gutter, and sidewalk; and could increase use of parks and recreation facilities due to increased access for pedestrians. However, physical deterioration or overuse of those facilities as a result of enhanced pedestrian safety and access are not expected. The Project does not propose or require construction of new parks or recreation facilities. No new enhancements are proposed in or around regional open spaces. New impacts would be Less Than Significant, and no mitigation measures are required.

Transportation/Traffic

Impacts to transportation and traffic were analyzed beginning on page 51 of the Final MND and were determined to be Less Than Significant With Mitigation Incorporated, Less Than Significant, or have No Impact. Compared to Step by Step as adopted, implementation of infrastructure proposals in the Project would also improve the County's pedestrian infrastructure, enhance pedestrian safety, and encourage walking as a viable form of transportation throughout the project area, and result in reduced reliance on auto trips. Proposed pedestrian enhancements are consistent with all County policies, plans, and programs regarding such facilities, and will enhance the safety and performance of such facilities for non-motorized users. Therefore, in general, implementation of the Project would also result in reduced vehicular traffic volumes on roadways and improvements in traffic operations as a result of enhancing the attractiveness, safety, and utility of walking as an alternative to short auto trips. Construction of proposed enhancements could result in temporary increases to traffic volumes due to construction-related road or lane closures. All project construction activities would still have to meet County Traffic Control Plan requirements and impacts would remain less than significant. Corridors identified for further study could result in reductions in vehicle capacity through roadway reconfiguration, if studies concluded such an outcome was necessary to protect and enhance pedestrian safety consistent with the goals of Step by Step as adopted. As these Community Pedestrian Plans are programmatic in nature and design details and project feasibility are unknown at this time, any future project development requiring discretionary approval would be subject to separate project-level environmental review in accordance with CEQA. Detailed analysis of traffic impacts will be required prior to implementation of individual projects that would affect roadway capacity or level of service. For individual projects, including removal of vehicular lanes, a detailed traffic study will be conducted during the project-level environmental review. This analysis will determine the exact nature and extent of anticipated traffic impacts based on existing and projected future traffic volumes, speeds, and amount of heavy vehicle traffic, and provide for mitigation measures to mitigate conflicts with any congestion management program as applicable. No proposals would affect air traffic patterns, as proposals are limited to roadways and adjacent pedestrian pathways. The enhancements proposed in the Project are intended to reduce hazards to pedestrians while maintaining adequate emergency access with the review and concurrence of the Los Angeles County Fire Department; and are not intended to introduce incompatible uses to roads or pathways. Physical modifications to intersections, such as the construction/modification of curb extensions and reduction of turn radii could reduce

vehicle speed, provide greater visibility for and of pedestrians, and enhance the safety of intersections for all roadway users. All roadway design would be done in accordance with best practices and engineering judgment. Impacts associated with an increase in hazards would be Less Than Significant. The Implementation of Final MND *Mitigation Measure MM 3.17-1* (General Plan 2035 *Mitigation Measure T-1*) would ensure impacts related to operational traffic congestion are reduced to a Less Than Significant level. New impacts would be Less Than Significant, and no new mitigation measures are required.

MM 3.17-1: The County shall continue to monitor potential impacts on roadway segments and intersections on a project-by-project basis as buildout occurs by requiring traffic studies for all projects that could significantly impact traffic and circulation patterns. Future projects shall be evaluated and traffic improvements shall be identified to maintain minimum levels of service in accordance with the County's Traffic Impact Analysis Guidelines, where feasible mitigation is available.

Tribal Cultural Resources

Impacts to tribal cultural resources were analyzed beginning on page 54 of the Final MND and were determined to be Less Than Significant With Mitigation Incorporated. Senate Bill 18 (Burton, 2004) created a requirement for consulting with Native American Indian Tribes (Tribes) during the adoption or amendment of local general plans or specific plans. Lists of project area Tribes are maintained and provided by the state Native American Heritage Commission. In December 2021, the County emailed all Tribes on the project area Senate Bill 18 (SB 18) list, which included all Tribes on the Assembly Bill 52 (Gatto, 2014) opt-in list maintained by the Department of Regional Planning, to incorporate Tribal considerations and information in good faith and as early in the planning process as possible. No emails were rejected/bounced back, and no responses were received. As the Project would amend a sub-element of the County's General Plan 2035, the County provided project information and offered consultation opportunities to Tribes on the project area SB 18 list consistent with that law via certified mail beginning on June 6, 2022. All mailings were confirmed delivered, and no responses were received as of October 19, 2022. Compared to Step by Step as adopted, all new infrastructure proposals in the Plans, including those resulting from new or revised policies/procedures, are primarily located within existing roadway rights-of-way in highly urbanized areas that do not contain known tribal cultural resources or human remains; and no proposals would directly demolish or materially alter such resources. Any excavation or grading for proposed pedestrian enhancements is not expected to uncover tribal cultural resources, as any ground-disturbing activity would likely be limited to shallow regrading of surfaces. New impacts would be Less Than Significant, and no new mitigation measures are required.

Utilities and Service Systems

Impacts to utilities and service systems were analyzed beginning on page 57 of the Final MND and were determined to be Less Than Significant or have No Impact; and did not include mitigation measures. Compared to Step by Step as adopted, the Project does not propose new housing or employment generators, and therefore would also not result in any substantial increase in sewage generation, and no additional sewage connections would be necessary. Any new runoff is expected to be minimal, given the small surface area of new sidewalks, curb extensions, and other infrastructure proposals. Likewise, minimal additional water demand during construction activities and no additional water treatment or distribution facilities would be required. The Project will not result in the generation of solid waste that would overburden the capacity of the existing or planned solid waste disposal service for the Project area. New impacts would be Less Than Significant, and no new mitigation measures are required.

Mandatory Findings of Significance

Mandatory findings of significance were analyzed beginning on page 59 of the Final MND and were determined to be Less Than Significant With Mitigation Incorporated or have No Impact. Given the discussions above, Project impacts would not be anticipated to exceed those previously analyzed in the Final MND. Compliance with applicable federal and state laws and regulations, General Plan policies, County design guidelines, General Plan Programmatic EIR Mitigation Measure T-1, and Final MND Mitigation Measures MM 3.3-1, MM 3.4-1 and -2, MM 3.5-1 and -2, MM 3.13-1 and -2, and MM 3.17-1 included above would ensure Project impacts do not exceed significance thresholds. With these measures in place, the Project would not cause new or substantially more severe impacts, potentially significant off-site impacts, cumulative impacts, or significant effects not previously identified discussed in the Final MND.

DRAFT