

Exhibit B
STATEMENT OF OVERRIDING CONSIDERATIONS

State CEQA Guidelines Section 15093
For the
2020 LA River Master Plan Program Environmental Impact Report
SCH# 2020070128

Lead Agency: Los Angeles County Public Works

The California Environmental Quality Act (CEQA) requires a public agency to balance the benefits of a proposed project against its significant and unavoidable adverse impacts in determining whether to approve the project. The *2020 LA River Master Plan* (Project) would result in some environmental effects that, although mitigated to the extent feasible by implementation of all feasible mitigation measures, would be significant and unavoidable adverse impacts, as discussed in the Final Program Environmental Impact Report (PEIR) and CEQA *Findings of Fact in Support of Findings Related to Significant Environmental Impacts* (Findings). These impacts are summarized below and constitute those impacts for which this Statement of Overriding Considerations is made.

As identified in the PEIR, because some later activities under the *2020 LA River Master Plan* would not be carried out by Los Angeles County (County), the County cannot enforce or guarantee that the mitigation measures identified would necessarily be incorporated. Therefore, in instances where the PEIR concludes a less-than-significant impact with mitigation for later activities carried out by the County (i.e., the County is directly undertaking the project), the impact would need to be deemed significant and unavoidable when these activities are not carried out by the County. However, if the mitigation measures identified in the Draft PEIR are adopted by another agency for impacts that are considered less than significant after the mitigation is implemented for County-led projects, then the impact would be reduced to less-than-significant levels for projects not carried out by the County, for the same reasons as discussed for later activities carried out by the County.

The following discussion is organized, in accordance with the topics outlined in Appendix G of the State CEQA Guidelines, by significant and unavoidable impacts (whether carried out by the County or other agency) as well as any additional significant and unavoidable impacts (not carried out by the County) due solely to the County's inability to enforce implementation of the mitigation measures proposed in the PEIR with respect to other agencies.

Significant and Unavoidable Environmental Impacts (Carried Out by the County and Not Carried Out by the County)

Aesthetics

1. Impact 3.1(a) (The proposed Project could have a substantial adverse effect on a scenic vista).

While implementation of Mitigation Measure AES-2 would minimize obstruction of scenic vistas, because the size, extent, and specific location of subsequent projects under the KOP Category 6 are not yet known, it is possible that KOP Category 6 and the Overall Master Plan

Implementation could substantially block or obstruct scenic vistas such as views of the ocean, ridgelines, and open space areas.

Accordingly, it cannot be stated with certainty without specific details on the scale, location, design, construction, and operation of the later activities that impacts would be reduced, even with the mitigation proposed. Mitigation Measure AES-2 would be implemented for projects developed under the *2020 LA River Master Plan* to ensure that impacts are minimized to the extent feasible. No additional feasible mitigation is known that would reduce the severity or degree of this impact to a less-than-significant level. Furthermore, there are no known additional feasible mitigation measures or alternatives (see Chapter 10 of the Findings) that would reduce substantial adverse effects on a scenic vista. Impacts would be significant and unavoidable.

Air Quality

1. Impact 3.2(b) (The proposed Project could result in a cumulatively considerable net increase in any criteria pollutant for which the project region is a nonattainment area with respect to the applicable Federal or State ambient air quality standard. Without specific details on construction and operation of later activities of KOP Categories 1 through 6 and the Overall Master Plan Implementation, emissions were not able to be quantified. Accordingly, it cannot be stated with certainty that impacts would be reduced below applicable regional or localized emissions thresholds. Mitigation would be implemented for all projects developed under the *2020 LA River Master Plan*, including KOP Categories 1 through 6 and the Overall Master Plan Implementation, to ensure that impacts are minimized to the extent feasible. Mitigation Measures GHG-2 and AQ-1 would control construction-period emissions under the KOP categories, and Mitigation Measures GHG-1a, AQ-2, and TRA-1b would control operation period emissions under the KOP categories. Because these impacts cannot be quantified and the impact reduction achieved from mitigation cannot be quantified, it is conservatively assumed that there may be instances where implementation of mitigation may be inadequate to reduce impacts below thresholds. Despite implementation of mitigation measures, the proposed Project would make a cumulatively considerable net increase in criteria pollutants. No additional feasible mitigation is known that would reduce the severity or degree of this impact to a less-than-significant level given that mitigation cannot be quantified and compared against the applicable regional or localized emissions thresholds. Furthermore, there are no additional known feasible mitigation measures or alternatives (see Chapter 10 of the Findings) that would reduce substantial adverse effects on air quality for KOP Categories 1 through 6 and Overall Master Plan Implementation. Impacts would be significant and unavoidable.
2. Impact 3.2(c) (The proposed Project could expose sensitive receptors to substantial pollutant concentrations). Without specific details on construction and operation of later activities of Typical Projects, KOP Categories 1 through 6, and the Overall Master Plan Implementation, mitigation for future project health risks may be inadequate to reduce impacts below SCAQMD's threshold level. Accordingly, it cannot be stated with certainty that impacts would be reduced, even with implementation of mitigation measures. Mitigation would be implemented for all projects developed under the *2020 LA River Master Plan* to ensure that impacts are minimized to the extent feasible. Mitigation Measures GHG-2 and AQ-1 would control construction-period emissions; Mitigation Measures GHG-1a, AQ-2, and TRA-1b would control operation period emissions; and Mitigation Measure AQ-3 would require development that exceeds the LTSs and is within 1,000 feet of existing sensitive receptors to prepare a site-specific operational HRA.

Mitigation Measure AQ-4 requires for subsequent projects with sensitive receptors (e.g., affordable housing) within 1,000 feet of existing TAC hazards (e.g., heavily traveled roadways, stationary sources), the implementing agency will prepare a site-specific construction and operational HRA. Because these impacts cannot be quantified and the impact reduction achieved from mitigation cannot be quantified, it is conservatively assumed that there may be instances where implementation of mitigation may be inadequate to reduce impacts below thresholds. Despite implementation of mitigation measures, the proposed Project could result in cancer or non-cancer health risks that exceed SCAQMD's thresholds.

No additional feasible mitigation is known that would reduce the severity or degree of this impact to a less-than-significant level given that, without specific details on the proposed Project, the impacts and impact reductions from mitigation cannot be quantified and compared against the applicable regional or localized emissions thresholds. There are no additional feasible mitigation measures or alternatives (see Chapter 10 of the Findings) that would reduce substantial adverse effects on air quality for Typical Projects, KOP Categories 1 through 6, and the Overall Master Plan Implementation. Impacts would be significant and unavoidable.

Cultural Resources

1. Impact 3.4(a) (The proposed Project could cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5). Without specific details on the scale, location, design, construction and operation of later activities of Typical Projects, KOP Categories 1 through 6, and the Overall Master Plan Implementation, impacts on historical resources cannot not be determined. Accordingly, it cannot be stated with certainty without specific details on construction and operation of the later activities that impacts would be reduced, even with the mitigation proposed. Mitigation would be implemented for projects developed under the *2020 LA River Master Plan* to ensure that impacts are minimized to the extent feasible. Implementation of Mitigation Measures CR-1a, CR-1b, CR-2a, CR-2b, CR-2c, CR-3a, CR-3b, and CR-3c would minimize potential impacts on historical resources; however, because the size, extent, and specific location of subsequent projects for both construction and operations under Typical Projects, KOP Categories 1 through 6, and the Overall Master Plan Implementation are not known, these activities could substantially impact historical resources. No additional feasible mitigation is known that would reduce the severity or degree of this impact to a less-than-significant level. There are no additional feasible mitigation measures or alternatives (see Chapter 10 of the Findings) that would reduce substantial adverse effects on historical resources. Impacts would be significant and unavoidable.
2. Impact 3.4(b) (The proposed Project could cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5). Without specific details on the scale, location, design, construction, and operation of later activities of Typical Projects, KOP Categories 1 through 6, and the Overall Master Plan Implementation, impacts on historical resources cannot not be determined. Accordingly, it cannot be stated with certainty without specific details on construction and operation of the later activities that impacts would be reduced, even with the mitigation proposed. Mitigation would be implemented for projects developed under the *2020 LA River Master Plan* to ensure that impacts are minimized to the extent feasible. Implementation of Mitigation Measures CR-1a, CR-1b, CR-4a, CR-4b, CR-4c, CR-4d, CR-5, and CR-6 would minimize potential impacts on archaeological resources; however, because the size, extent, and specific location of subsequent projects for both construction and operations under Typical Projects, KOP Categories 1 through 6, and the Overall Master Plan

Implementation are not known, these activities could substantially affect archaeological resources. No additional feasible mitigation is known that would reduce the severity or degree of this impact to a less-than-significant level. There are no additional feasible mitigation measures or alternatives (see Chapter 10 of the Findings) that would reduce substantial adverse effects on archaeological resources. Impacts would be significant and unavoidable.

3. Impact 3.4(c) (The proposed Project could disturb human remains, including those interred outside of dedicated cemeteries). Without specific details on the scale, location, design, construction, and operation of later activities of Typical Projects, KOP Categories 1 through 6, and the Overall Master Plan Implementation, impacts on historical resources cannot be determined. Accordingly, it cannot be stated with certainty without specific details on construction and operation of the later activities that impacts would be reduced, even with the mitigation proposed. Mitigation would be implemented for projects developed under the *2020 LA River Master Plan* to ensure that impacts are minimized to the extent feasible. Implementation of Mitigation Measures CR-1a, CR-1b, CR-4a, CR-4b, CR-4c, CR-4d, CR-5, CR-6, and CR-7 would minimize potential impacts on human remains and associated or unassociated funerary objects; however, because the size, extent, and specific location of subsequent projects for both construction and operations under Typical Projects, KOP Categories 1 through 6, and the Overall Master Plan Implementation are not known, these activities could substantially impact archaeological resources. No additional feasible mitigation is known that would reduce the severity or degree of this impact to a less-than-significant level. There are no additional feasible mitigation measures or alternatives (see Chapter 10 of the Findings) that would reduce substantial adverse effects on human remains and associated or unassociated funerary objects. Impacts would be significant and unavoidable.

Greenhouse Gas Emissions

1. Impact 3.7(a) (The proposed Project could generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment). Typical Projects would be designed using the *2020 LA River Master Plan* Design Guidelines, and, if implemented, would be consistent with the 2017 Scoping Plan measures and the State's regulatory programs within these sectors. (The Design Guidelines are draft guidelines and will be finalized with adoption of the *2020 LA River Master Plan*.) However, while the County would encourage implementation of the Design Guidelines, there is no guarantee that any of these measures will be incorporated into the design of the Typical Projects given that they are not required and the decision to implement them would be determined by the project proponent. Furthermore, it is anticipated that buildings would use natural gas and landscaping equipment would be gasoline powered, both of which are inconsistent with the California Governor's Office of Planning and Research (2018a) guidance. In addition, daily vehicle trips would exceed the California Governor's Office of Planning and Research's (2018b) daily trip screening threshold.

Without specific details on the scale, location, design, construction, and operation of later activities, greenhouse gas emissions were not able to be quantified. Mitigation would be implemented for projects developed under the *2020 LA River Master Plan* to ensure that impacts are minimized to the extent feasible. Implementation of Mitigation Measure GHG-1a and compliance with a minimum of the Design Guidelines related to water, energy, and waste would be required for all new construction. Mitigation would also require electrified buildings and landscaping equipment. Nonetheless, there would still be an increase in vehicle miles traveled (VMT) resulting from the Project. Mitigation Measure TRA-1b would require various

transportation demand management (TDM) measures to reduce VMT, which would reduce mobile-source emissions. Nonetheless, given the range in the possible size and programmatic intensity of the project elements/design, significant VMT impacts may not be fully mitigated even with TDM measures. Consequently, while emissions from the land use, energy, area, water, and waste sectors would generally be consistent with the 2017 Scoping Plan with implementation of mitigation, emissions from the mobile sector would be inconsistent with the 2017 Scoping Plan and applicable regulatory programs. No additional feasible mitigation is known that would reduce the severity or degree of this impact to a less-than-significant level given that, without specific details on the proposed Project, the impacts and impact reductions from mitigation cannot be quantified and compared against the applicable regional or localized emissions thresholds. Therefore, emissions associated with both the construction and operation phases of the Typical Projects would be significant and unavoidable.

For the six KOP categories, subsequent project-level analyses will identify the appropriate strategies from Mitigation Measure GHG-1a for their projects. For example, if, at the time specific project details are known, it can be stated with certainty that KOP Category 3 would not result in emissions associated with a particular sector (e.g., area) outlined in Mitigation Measure GHG-1a, then the corresponding mitigation for that sector (e.g., electric landscaping equipment) would not need to be implemented for that KOP category. Although Mitigation Measures GHG-1a and TRA-1b would be implemented to ensure that impacts are minimized to the extent feasible, in the absence of specific project design details (e.g., sustainability features, expected VMT, electricity, and natural gas consumption), it cannot be stated with certainty that the KOP Categories 1 through 6 would comply with the long-term GHG reduction targets and goals of applicable regulatory programs. Even with mitigation, both construction and operation impacts of the six KOP categories would be significant and unavoidable. This conclusion of significant and unavoidable impacts also applies to the Overall Master Plan Implementation.

2. Impact 3.7(b) (The proposed Project could conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases). Because the applicable policies, plans, and regulations adopted for the purpose of reducing the emissions of GHGs are relevant to both the construction and operation phases of the proposed Project, discussion of the plan consistency has been combined.

Without specific details on construction and operation of later activities for KOP Categories 1 through 6, and the Overall Master Plan Implementation, emissions were not able to be determined to not conflict with applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of greenhouse gases. Accordingly, it cannot be stated with certainty that impacts would be reduced, even with implementation of mitigation measures. The lack of specific sites or detailed design information makes it particularly challenging to make informed assumptions about reasonable construction and operations scenarios for the KOP categories. It is assumed that development under the KOP categories would be greater than for the Typical Projects, and that associated GHG emissions could potentially result in an inconsistency with one or more of the GHG plans. Impacts related to the potential for construction and operation of the KOP categories to conflict with or obstruct implementation of an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs would be potentially significant. Although Mitigation Measures GHG-1a and GHG-2 would be implemented to ensure that impacts are minimized to the extent feasible, in the absence of specific project details (e.g., expected VMT, proximity to transit centers), it cannot be stated with certainty that the construction and operation of the KOP categories would be consistent with the applicable GHG

regulatory programs. Because development of the *2020 LA River Master Plan* represents all of the Typical Projects and KOP categories combined, the associated construction and operation GHG emissions could potentially result in an inconsistency with one or more of the GHG plans analyzed for the Typical Projects. Impacts related to the potential for construction and operation of the *2020 LA River Master Plan* to conflict with or obstruct implementation of an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs would be significant. No additional feasible mitigation is known that would reduce the severity or degree of this impact to a less-than-significant level given that, without specific details on the proposed Project, the impacts and impact reductions from mitigation cannot be quantified and compared against applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of greenhouse gases. There are no additional feasible mitigation measures or alternatives (see Chapter 10 of the Findings) that would reduce impacts. Even with mitigation, impacts would be significant and unavoidable.

Land Use and Planning

1. Impact 3.10(a): (The proposed Project could physically divide an established community). For KOP Category 6, off-channel land asset projects would likely entail greater levels of construction than for the Typical Projects and the other five KOP categories and would occur outside the right-of-way. Design components under KOP Category 6 could be considerably larger than design components under the other KOP categories, resulting in more extensive environmental effects during construction. These projects could occur within established neighborhoods and result in temporary road closures and obstructions to community facilities, which could divide an established community.

Without specific details on the scale, location, design, construction, and operation of later activities, impacts on established communities cannot not be determined. Accordingly, it cannot be stated with certainty without specific details on construction and operation of the later activities that impacts would be reduced, even with the mitigation proposed. Mitigation would be implemented for projects developed under the *2020 LA River Master Plan* to ensure that impacts are minimized to the extent feasible. Even with implementation of Mitigation Measures LU-1 and LU-2, a potentially significant impact could remain for KOP Category 6 during the construction period as a result of physical division of an established community. No additional feasible mitigation is known that would reduce the severity or degree of this impact to a less-than-significant level given that, without specific details on the proposed Project, the impacts and impact reductions from mitigation cannot be determined. There are no additional feasible mitigation measures or alternatives (see Chapter 10 of the Findings) that would reduce substantial adverse effects on established communities. Impacts would be significant and unavoidable.

2. Impact 3.10(b) (The proposed Project could cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect). Larger off-channel land asset design components in KOP Category 6, such as affordable housing and museums, would entail greater levels of construction than under the other five KOP categories. Without specific details on the scale, location, design, construction, and operation of later activities, impacts related to conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or reducing an environmental effect cannot not be determined. Accordingly, it cannot be stated with certainty without specific details on construction and operation of the later activities that

impacts would be reduced, even with the mitigation proposed. Mitigation would be implemented for projects developed under the *2020 LA River Master Plan* to ensure that impacts are minimized to the extent feasible. Despite implementation of Mitigation Measures LU-1 and LU-2, if further CEQA review determines a potentially significant impact could occur from construction of the specific design components proposed under KOP Category 6 and no feasible mitigation is available, a significant and unavoidable impact for KOP Category 6 could occur under the *2020 LA River Master Plan*. This conclusion of significant and unavoidable impacts also applies to the Overall Master Plan Implementation. No additional feasible mitigation is known that would reduce the severity or degree of this impact to a less-than-significant level given that, without specific details on the proposed Project, the impacts and impact reductions from mitigation cannot be determined. There are no additional feasible mitigation measures or alternatives (see Chapter 10 of the Findings) that would reduce substantial adverse effects conflicting with any applicable land use plan, policy, or regulation. Impacts would be significant and unavoidable.

Minor inconsistencies with applicable land use policies could occur, such as if a design component under KOP Categories 1 and 2 would conflict with planned land uses on adjacent parcels, be incompatible with adjacent land uses, or result in out-of-scale development. Projects under KOP Categories 1 and 2 would consist of multi-use trails, a recreational use, or a range of flood management, recreation, and ecological functions to provide additional recreation uses serving visitors and residents and would not be within residential neighborhoods. Therefore, these projects would not be expected to be inconsistent with the goals listed in Table 3.10-7. As the location and extent of subsequent projects that could operate under KOP Category 6 are unknown, it cannot be stated with certainty whether there would be inconsistencies with applicable land use plans, policies, or regulations. The potential remains for a significant impact to occur despite implementation of Mitigation Measure LU-4. Should further CEQA review determine that a potential impact could occur from operation of the specific design components proposed under KOP Categories 1, 2, and 6, and no further feasible mitigation is available, a significant and unavoidable impact would occur. This conclusion of significant and unavoidable impacts also applies to the Overall Master Plan Implementation.

Noise

1. Impact 3.12(a) (The proposed Project could result in a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies). The specific location and design for off-channel land asset design components in KOP Category 6 have not been determined and, without specific details on the scale, location, and design of later activities, construction noise impacts cannot be directly quantified. Inclusion of Mitigation Measures NOI-1 through NOI-3 and compliance with the jurisdictional codes and planning documents would reduce impacts. Inclusion of Mitigation Measures NOI-6, preparation of a noise study, and implementation of site-specific mitigation measures identified in the noise study would reduce impacts. For the Typical Projects in the City of Vernon, implementation of Mitigation Measure NOI-2 would require the implementing agency to obtain a conditional use permit with the City of Vernon. As there is no guarantee that the city would approve the application for a conditional use permit, this mitigation measure cannot reduce impacts to less than significant with mitigation. For similar reasons, even with implementation of Mitigation Measures NOI-1 through NOI-6, operational impacts could remain significant and unavoidable for the Overall Master Plan Implementation.

2. Impact 3.12(b) (The proposed Project would generate excessive groundborne vibration or groundborne noise levels). Without specific details on the scale, location, design, construction, and operation of later activities for KOP Category 6 and Overall Master Plan Implementation, groundborne vibration or groundborne noise levels cannot not be quantified. Accordingly, it cannot be stated with certainty without specific details on construction and operation of the later activities that impacts would be reduced to less-than-significant levels, even with the mitigation proposed. Mitigation would be implemented for all projects developed under the *2020 LA River Master Plan* to ensure that impacts are minimized to the extent feasible. Inclusion of Mitigation Measure NOI-9 and compliance with the jurisdictional codes and planning documents would reduce impacts. However, it cannot be stated with certainty that vibration impacts could be reduced to levels below the County's 0.01 peak particle velocity threshold. As such, construction impacts associated with KOP Category 6 could be significant and unavoidable. For similar reasons, even with implementation of Mitigation Measures NOI-7 through NOI-9, construction impacts could remain significant and unavoidable for the Overall Master Plan Implementation. No additional feasible mitigation is known that would reduce the severity or degree of this impact to a less-than-significant level given that, without specific details on the proposed Project, the impacts and impact reductions from mitigation cannot be quantified. There are no additional feasible mitigation measures or alternatives (see Chapter 10 of the Findings) that would reduce substantial adverse effects on groundborne vibration or groundborne noise levels. Impacts would be significant and unavoidable.

Public Services

1. Impact 3.14(a) (The proposed Project could result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection, police protection, schools, parks, and other public facilities). Without specific details on the scale, location, design, construction, and operation of later activities for KOP Categories 1 through 6 and the Overall Master Plan Implementation, impacts on police and fire services cannot not be determined. Accordingly, it cannot be stated with certainty without specific details on construction and operation of the later activities that impacts would be reduced, even with the mitigation proposed. Mitigation would be implemented for all projects developed under the *2020 LA River Master Plan* to ensure that impacts are minimized to the extent feasible. Implementation of Mitigation Measure PS-1 would minimize potential impacts on fire and police services; however, because the size, extent, and specific location of subsequent projects under the KOP Category 6 are not yet known, it is possible that KOP Category 6 and the Overall Master Plan Implementation could substantially affect the service ratios. Mitigation Measure LU-1 requires a construction management plan that would assist in potential impacts on fire and police response times. No additional feasible mitigation is known that would reduce the severity or degree of this impact to a less-than-significant level given that, without specific details on the proposed Project, the impacts and impact reductions from mitigation cannot be determined. There are no additional feasible mitigation measures or alternatives (see Chapter 10 of the Findings) that would reduce substantial adverse effects on police and fire services. Impacts would be significant and unavoidable.

Recreation

Impact 3.15(b): Would the proposed Project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. Throughout all nine frames, the proposed Project would include the construction and operation of recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. Construction could require demolition, grading, and excavation activities and the construction of permanent facilities. These activities would result in a temporary increase in noise and an increase in air quality construction-related emissions. They could also have impacts related to aesthetics, biological resources, cultural resources, geology, hydrology and water quality, land use, traffic, and utilities. Additionally, the operation of new and expanded recreational facilities may result in an adverse physical effect on the environment. Refer to the following sections in the Draft PEIR for detailed descriptions of the proposed Project and potential environmental impacts: 3.1, *Aesthetics*; 3.2, *Air Quality*; 3.3, *Biological Resources*; 3.4, *Cultural Resources*; 3.5, *Energy*; 3.6, *Geology, Soils, and Paleontological Resources*; 3.7, *Greenhouse Gas Emissions*; 3.8, *Hazards and Hazardous Materials*; 3.9, *Hydrology and Water Quality*; 3.10, *Land Use and Planning*; 3.11, *Mineral Resources*; 3.12, *Noise*; 3.13, *Population and Housing*; 3.14, *Public Services*; 3.16, *Transportation*; 3.17, *Tribal Cultural Resources*; 3.18, *Utilities and Service Systems*; and 3.19, *Wildfire*. The impact on recreation would be significant and unavoidable even with mitigation identified for the resources above.

Transportation

1. Impact 3.16(b) (The proposed Project could conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b)). Without specific details on the scale, location, design, construction, and operation of later activities for Typical Projects, KOP Categories 1 through 6, and the Overall Master Plan Implementation, VMT cannot be quantified. Accordingly, it cannot be stated with certainty without specific details on operation of the later activities that impacts would be reduced, even with the mitigation proposed. Mitigation would be implemented for projects developed under the *2020 LA River Master Plan* to ensure that impacts are minimized to the extent feasible. Implementation of a site-specific screening pursuant to County Guidelines Sections 3.1.2.1, 3.1.2.2, and 3.1.2.3 for land use projects and Guidelines Section 3.2.1 and 3.2.2 for transportation projects and implementation of a TDM and/or site/neighborhood enhancement program for any subsequent project that does not screen out (Mitigation Measure TRA-1a) would reduce VMT impacts. However, given the range in the possible size and programmatic intensity of the potentially significant project elements/design components for the Common Elements Typical Projects, KOP Categories 1 through 6, and the Overall Master Plan Implementation, significant VMT operational impacts may not be fully mitigable even with TDM measures (Mitigation Measure TRA-1b). No additional feasible mitigation is known that would reduce the severity or degree of this impact to a less-than-significant level given that, without specific details on the proposed Project, the impacts and impact reductions from mitigation cannot be quantified. There are no additional feasible mitigation measures or alternatives (see Chapter 10 of the Findings) that would reduce VMT impacts. As such, impacts would be significant and unavoidable.

Tribal Cultural Resources

2. Impact 3.17(a) (The proposed Project could cause a substantial adverse change in the significance of a TCR defined in PRC Section 21074 as a site, feature, place, or 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.) Without specific details on the scale, location, design, construction and operation of later activities for Typical Projects, KOP Categories 1 through 6, and the Overall Master Plan Implementation, impacts related to a substantial adverse change in the significance of a TCR cannot be determined. Accordingly, it cannot be stated with certainty without specific details on construction and operation of the later activities that impacts would be reduced, even with the mitigation proposed. Mitigation would be implemented for projects developed under the *2020 LA River Master Plan* to ensure that impacts are minimized to the extent feasible. Although implementation of Mitigation Measures CR-1a, CR-1b, CR-4a, CR-4b, CR-4c, CR-4d, CR-5, TCR-1, TCR-2, and TCR-3 could help reduce the impacts, the specific locations of projects and presence of TCRs, as well as the projects' effects on TCRs, are not known at this time. Therefore, it is possible that impacts could remain significant. No additional feasible mitigation is known that would reduce the severity or degree of this impact to a less-than-significant level given that, without specific details on the proposed Project, the impacts and impact reductions from mitigation cannot be certain. Furthermore, there are no additional feasible mitigation measures or alternatives (see Chapter 10 of the Findings) that would reduce substantial adverse effects on TCR. Impacts would be significant and unavoidable.

Utilities/Service Systems

1. Impact 3.18(a) (The proposed Project could require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects). Without specific details on the scale, location, design, construction, and operation of later activities for KOP Categories 1 through 6 and the Overall Master Plan Implementation, impacts on utilities cannot not be determined. Accordingly, it cannot be stated with certainty without specific details on construction and operation of the later activities that impacts would be reduced, even with the mitigation proposed. Mitigation would be implemented for projects developed under the *2020 LA River Master Plan* to ensure that impacts are minimized to the extent feasible. UTIL-1 is required to ensure that the implementing agency will prepare a utilities plan to identify project modifications that will minimize any significant environmental impact on utilities as well as develop a utilities report to compares the expected operational demand and generation for the various utility resources against existing supply and infrastructure. However, the locations of future projects are unknown, and each subsequent project would require evaluation to determine whether insufficiencies in utilities exist. Implementation of mitigation would reduce the level of impact, but not necessarily to a less-than-significant level. No additional feasible mitigation is known that would reduce the severity or degree of this impact to a less-than-significant level given that, without specific details on the proposed Project, the impacts and impact reductions from mitigation cannot be determined. There are no additional feasible mitigation measures or alternatives (see Chapter 10 of the Findings) that would reduce substantial adverse effects on sufficient supply/capacity for one or more utilities. Impacts would be significant and unavoidable.

2. Impact 3.18(b) (The proposed Project would potentially not have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years). Without specific details on the scale, location, design, construction, and operation of later activities for KOP Category 6 and Overall Master Plan Implementation, impacts on water supplies cannot not be determined. Accordingly, it cannot be stated with certainty without specific details on construction and operation of the later activities that impacts would be reduced, even with the mitigation proposed. Mitigation would be implemented for projects developed under the *2020 LA River Master Plan* to ensure that impacts are minimized to the extent feasible. UTIL-2 is required to ensure that the implementing agency will prepare a water supply assessment in accordance with the requirements of SB 610. However, the locations of future projects are unknown, and each subsequent project would require evaluation to determine whether insufficiencies in utilities exist. Implementation of mitigation would reduce the level of impact, but not necessarily to a less-than-significant level. No additional feasible mitigation is known that would reduce the severity or degree of this impact to a less-than-significant level given that, without specific details on the proposed Project, the impacts and impact reductions from mitigation cannot be determined. There are no additional feasible mitigation measures or alternatives in the Final PEIR (see Chapter 10 of the Findings) that would reduce substantial adverse effects on water supplies. Impacts would be significant and unavoidable.
3. Impact 3.18(c) (The proposed Project could result in a determination by the wastewater treatment provider that serves or may serve the Project that it does not have adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments). Without specific details on the scale, location, design, construction, and operation of later activities for KOP Category 6 and Overall Master Plan Implementation, impacts on wastewater cannot not be determined. Accordingly, it cannot be stated with certainty without specific details on construction and operation of the later activities that impacts would be reduced, even with the mitigation proposed. Mitigation would be implemented for projects developed under the *2020 LA River Master Plan* to ensure that impacts are minimized to the extent feasible. UTIL-1 is required to ensure that the implementing agency will prepare a utilities plan to identify project modifications that will minimize any significant environmental impact on utilities as well as develop a utilities report to compare the expected operational demand and generation for the various utility resources against existing supply and infrastructure. However, the locations of future projects are unknown, and each subsequent project would require evaluation to determine whether insufficiencies in utilities exist. Implementation of mitigation would reduce the level of impact, but not necessarily to a less-than-significant level. No additional feasible mitigation is known that would reduce the severity or degree of this impact to a less-than-significant level, given that, without specific details on the proposed Project, the impacts and impact reductions from mitigation cannot be determined. There are no additional feasible mitigation measures or alternatives (see Chapter 10 of the Findings) that would reduce substantial adverse effects on wastewater. Impacts would be significant and unavoidable.

Wildfire

1. Impact 3.19(b) (The proposed Project, due to slope, prevailing winds, and other factors, could exacerbate wildfire risks of, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire). Without specific details on the scale, location, design, construction, and operation of later activities for Typical Projects, KOP Categories 1 through 6, and the Overall Master Plan Implementation, impacts on wildfire risk

cannot be determined. Accordingly, it cannot be stated with certainty without specific details on construction and operation of the later activities that impacts would be reduced, even with the mitigation proposed. Mitigation would be implemented for projects developed under the *2020 LA River Master Plan* to ensure that impacts are minimized to the extent feasible. Mitigation Measure WF-3 is required to ensure that the implementing agency will prepare a Fire Protection Plan (FPP) to minimize potential operations-related impacts associated with wildfire risk for projects. However, the locations of future projects are unknown, and the potential wildfire-related risks (e.g., types of vegetation at project sites and level of human activity) are also unknown. Accordingly, it cannot be guaranteed that the preparation and implementation of an FPP would effectively reduce the potential impacts to less-than-significant levels. No additional feasible mitigation is known that would reduce the severity or degree of this impact to a less-than-significant level given that, without specific details on the proposed Project, the impacts and impact reductions from mitigation cannot be determined. There are no additional feasible mitigation measures or alternatives (see Chapter 10 of the Findings) that would reduce substantial adverse effects on wildfire risk. Impacts would be significant and unavoidable.

2. Impact 3.19(c) (The proposed Project could 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 result in temporary or ongoing impacts on the environment). Without specific details on the scale, location, design, construction, and operation of later activities for Typical Projects, KOP Categories 1 through 6, and the Overall Master Plan Implementation, impacts on exacerbating fire risk cannot be determined. Accordingly, it cannot be stated with certainty without specific details on construction and operation of the later activities that impacts would be reduced, even with the mitigation proposed. Mitigation would be implemented for projects developed under the *2020 LA River Master Plan* to ensure that impacts are minimized to the extent feasible. Mitigation Measure WF-3 is required to ensure that the implementing agency will prepare a FPP to minimize potential operations-related impacts associated with wildfire risk for projects. However, the locations of future projects are unknown, and the potential wildfire-related risks (e.g., types of vegetation at project sites and level of human activity) are also unknown. Accordingly, it cannot be guaranteed that the preparation and implementation of an FPP would effectively reduce the potential impacts to less-than-significant levels. No additional feasible mitigation is known that would reduce the severity or degree of this impact to a less-than-significant level, given that, without specific details on the proposed Project, the impacts and impact reductions from mitigation cannot be determined. There are no additional feasible mitigation measures or alternatives (see Chapter 10 of the Findings) that would reduce substantial adverse effects on exacerbating fire risk. Impacts would be significant and unavoidable.

Additional Significant and Unavoidable Environmental Impacts (Not Carried Out by the County)

Aesthetics

1. Impact 3.1(a) (The proposed Project could have a substantial adverse effect on a scenic vista). The proposed Project has been changed by requiring the following mitigation measures: Mitigation Measures AES-1, LU-1, and REC-1. Mitigation Measure AES-1 will minimize obstruction of views of scenic resources by requiring the installation of construction fencing; Mitigation Measure LU-1 will manage construction parking and traffic flows; and Mitigation

Measure REC-1 will minimize disruption of recreational uses and continue to allow opportunities for viewing scenic resources. These mitigation measures will ensure that there would not be substantial adverse effects on scenic vistas. Impacts associated with project construction would be significant and unavoidable when later activities under the *2020 LA River Master Plan* would not be carried out by the County because the County cannot enforce or guarantee that mitigation measures (Mitigation Measures AES-1, LU-1, and REC-1) would be implemented by the other agencies. However, if these mitigation measures (Mitigation Measures AES-1, LU-1, and REC-1) are adopted by another agency, the impact would be reduced to less than significant.

2. Impact 3.1(c) (In non-urbanized areas, the proposed Project could substantially degrade the existing visual character or quality of public views of the site and its surroundings. In an urbanized area, the proposed Project Could conflict with applicable zoning and other regulations governing scenic quality). The proposed Project has been changed by requiring the following mitigation measures: Mitigation Measures AES-1, LU-1, and REC-1. Mitigation Measure AES-1 will minimize obstruction of views of scenic resources by requiring the installation of construction fencing; Mitigation Measure LU-1 will manage construction parking and traffic flows; and Mitigation Measure REC-1 will minimize disruption of recreational uses and continue to allow opportunities for viewing scenic resources. These mitigation measures will ensure that the proposed Project would not substantially degrade the existing visual character or quality of public views of the site and would not conflict with applicable zoning and other regulations governing scenic quality. Impacts associated with project construction would be significant and unavoidable when later activities under the *2020 LA River Master Plan* would not be carried out by the County because the County cannot enforce or guarantee that mitigation measures (Mitigation Measures AES-1, LU-1, and REC-1) would be implemented by the other agencies. However, if mitigation measures are adopted by another agency, the impact would be reduced to less than significant.
3. Impact 3.1(d) (The proposed Project could create a new source of substantial light or glare that would adversely affect day or nighttime views in the area). The proposed Project has been changed by requiring the following mitigation measures: Mitigation Measures AES-3a and AES-3b. Under Mitigation Measure AES-3a, exterior lighting would be designed to shield and direct illumination to the subsequent project sites and minimize light spillover to any adjacent residential uses. In addition, Mitigation Measure AES-3b would minimize glare by requiring that the exterior of the proposed buildings/structures be constructed of materials such as high-performance, tinted, non-mirrored glass; painted metal panels; and pre-cast concrete or fabricated wall surfaces. With the implementation of these mitigation measures, project construction would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Impacts associated with project construction would be significant and unavoidable when later activities under the *2020 LA River Master Plan* would not be carried out by the County because the County cannot enforce or guarantee that mitigation measures (Mitigation Measures AES-3a and AES-3b) would be implemented by the other agencies. However, if mitigation measures are adopted by another agency, the impact would be reduced to less than significant.

Air Quality

1. Impact 3.2(d) (The proposed Project could result in other emissions [such as those leading to odors] adversely affecting a substantial number of people). Mitigation Measure AQ-5 would

require cleaning of equestrian facilities at least once per day, as well as composting manure and soiled bedding and covering stockpiled material with a lid or tarp at the furthest feasible distance from residents and/or sensitive receptors. Mitigation Measure AQ-5 would ensure that manure is properly handled or composted to reduce offsite nuisance violations. Impacts associated with project operations would be significant and unavoidable when later activities under the *2020 LA River Master Plan* would not be carried out by the County because the County cannot enforce or guarantee that the abovementioned mitigation measure would be implemented by the other agencies. However, if mitigation measures are adopted by another agency, the impact would be reduced to less than significant.

Biological Resources

1. Impact 3.3(a) (The proposed Project could 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). The purpose of Mitigation Measure BIO-1 is to begin the process of making a determination of whether or not the proposed individual subsequent project would have a significant environmental impact on biological resources. Mitigation Measure BIO-2 requires the implementing agency to avoid “take” of species, if applicable/occurring, within the action area. Mitigation Measures BIO-3a through BIO-3g avoid or reduce potential construction impacts on birds, including burrowing owls, bats, and American badgers. Mitigation Measures BIO-4 and BIO-5 would avoid or reduce potential impacts on sensitive habitat (e.g., wetlands, habitat for special-status species, wildlife movement corridors, nest sites) if present. Mitigation Measures BIO-6 through BIO-9 would reduce or avoid potential construction-related impacts on special-status plants, wildlife, and/or aquatic resources, sensitive habitat, or protected trees. Mitigation Measures BIO-10 and BIO-11 would be implemented if there is potential for special-status wildlife—including special-status mammals, reptiles, or amphibians—that could become entrapped in construction materials or excavations. If special-status birds (or those protected by the Migratory Bird Treaty Act and California Fish and Game Code) and special-status mammals, reptiles, or amphibians have the potential to occur, then Mitigation Measures BIO-12 and BIO-13 would be implemented. If special-status wildlife, nesting birds, raptors, or eagles could occur, then Mitigation Measure BIO-14 would be implemented to avoid or reduce construction-related impacts. Mitigation Measures BIO-15 through BIO-17 would avoid or minimize direct and indirect impacts on invertebrates, fish, mammals, reptiles, amphibians, birds, and raptors. Mitigation Measure BIO-18 would avoid the spread of invasive species and encourage the use of native plant species. Lastly, where opportunities for habitat reclamation efforts exist, Mitigation Measure BIO-19 would be implemented to ensure restoration best management practices are used. Impacts associated with project construction would be significant and unavoidable when later activities under the *2020 LA River Master Plan* would not be carried out by the County because the County cannot enforce or guarantee that the abovementioned mitigation measures would be implemented by the other agencies. However, if Mitigation Measures BIO-1 through BIO-19 are adopted by another agency, the impact would be reduced to less than significant.
2. Impact 3.3(b). (The proposed Project could have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service). The purpose of Mitigation Measure BIO-1 is to begin the process of making a determination of whether or not the proposed individual subsequent project would have a

significant environmental impact on biological resources. Mitigation Measures BIO-4 and BIO-5 would avoid or reduce potential impacts on sensitive habitat (e.g., wetlands, habitat for special-status species, wildlife movement corridors, nest sites) if present. Mitigation Measures BIO-6 through BIO-9 would reduce or avoid potential construction-related impacts on special-status plants, wildlife, and/or aquatic resources, sensitive habitat, or protected trees. Mitigation Measure BIO-20a requires that riparian and sensitive natural communities be mapped prior to construction. Mitigation Measure BIO-20b would protect sensitive natural communities and native trees against tree diseases, pests, and pathogens. If the proposed Project cannot avoid direct impacts on either riparian habitats or other sensitive natural communities, then Mitigation Measure BIO-20c should be implemented to mitigate riparian habitats and sensitive communities. Impacts associated with project construction would be significant and unavoidable when later activities under the *2020 LA River Master Plan* would not be carried out by the County because the County cannot enforce or guarantee that the abovementioned mitigation measures would be implemented by the other agencies. However, if Mitigation Measures BIO-1, BIO-4, BIO-5, BIO 6, BIO-8, BIO-9, BIO-20a, BIO-20b, and BIO-20c are adopted by another agency, the impact would be reduced to less than significant.

3. Impact 3.3(c) (The proposed Project could have a substantial adverse effect on federally or State-protected wetlands [including, but not limited to, marshes, vernal pools, coastal wetlands, etc.] through direct removal, filling, hydrological interruption, or other means). The purpose of Mitigation Measure BIO-1 is to begin the process of making a determination of whether or not the proposed individual subsequent project would have a significant environmental impact on biological resources. Mitigation Measures BIO-21a through BIO-21e would avoid or reduce impacts on wetlands and/or jurisdictional aquatic resources. Mitigation Measures BIO-22a and BIO-22b would avoid or reduce impacts on wetlands during project operations. Impacts associated with project construction would be significant and unavoidable when later activities under the *2020 LA River Master Plan* would not be carried out by the County because the County cannot enforce or guarantee that the abovementioned mitigation measures would be implemented by the other agencies. However, if Mitigation Measures BIO 1, BIO-21a through BIO-21e, and BIO-22a and BIO-22b are adopted by another agency, the impact would be reduced to less than significant.
4. Impact 3.3(d) (The proposed Project could interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites). Mitigation Measures BIO-6 through BIO-9 would reduce or avoid potential construction-related impacts on special-status plants, wildlife, and/or aquatic resources, sensitive habitat, or protected trees. Mitigation Measures BIO-10 and BIO-11 would be implemented if there is potential for special-status wildlife—including special-status mammals, reptiles, or amphibians—that could become entrapped in construction materials or excavations. If special-status birds (or those protected by the Migratory Bird Treaty Act and California Fish and Game Code) and special-status mammals, reptiles, or amphibians have the potential to occur, then Mitigation Measures BIO-12 and BIO-13 would be implemented. If special-status wildlife, nesting birds, raptors, or eagles could occur, then Mitigation Measure BIO-14 would be implemented to avoid or reduce construction-related impacts. Mitigation Measures BIO-15 through BIO-17 would avoid or minimize direct and indirect impacts on invertebrates, fish, mammals, reptiles, amphibians, birds, and raptors. Mitigation Measure BIO-18 would avoid the spread of invasive species and encourage the use of native plant species. Lastly, for where opportunities for habitat reclamation efforts exist, Mitigation Measure BIO-19 would be implemented to ensure restoration best management

practices are used. Lastly, Mitigation Measure BIO-23 ensures that all projects, during design, construction, operations, and maintenance, at a minimum, maintain current existing ecological connectivity function and value and prevent unintended deleterious consequences to wildlife species, connectivity, and nursery sites. Impacts associated with project construction would be significant and unavoidable when later activities under the *2020 LA River Master Plan* would not be carried out by the County because the County cannot enforce or guarantee that the abovementioned mitigation measures would be implemented by the other agencies. However, if Mitigation Measures BIO-9 through BIO-19 and BIO-23 are adopted by another agency, the impact would be reduced to less than significant.

5. Impact 3.3(e) (The proposed Project could conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance). Mitigation Measure BIO-24 requires that if tree removals cannot be avoided, then compensatory mitigation be required on protected trees. Impacts associated with project construction would be significant and unavoidable when later activities under the *2020 LA River Master Plan* would not be carried out by the County because the County cannot enforce or guarantee that the abovementioned mitigation measure would be implemented by the other agencies. However, if Mitigation Measure BIO-24 is adopted by another agency, the impact would be reduced to less than significant.

Geology, Soils, and Paleontological Resources

1. Impact 3.6(a) (The proposed Project could directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death). Mitigation Measure GEO-1 requires a site-specific geotechnical study with recommendations for load-bearing projects to address potential fault rupture, seismic ground shaking, ground failure, and liquefaction hazards during construction and operations. This mitigation measure will ensure that there will not be substantial adverse effects on fault rupture, seismic ground shaking, ground failure, and liquefaction hazards. Impacts associated with project construction would be significant and unavoidable when later activities under the *2020 LA River Master Plan* would not be carried out by the County because the County cannot enforce or guarantee that the abovementioned mitigation measure would be implemented by the other agencies. However, if Mitigation Measure GEO-1 is adopted by another agency, the impact would be reduced to less than significant.
2. Impact 3.6(c) (The proposed Project could 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 an onsite or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse). Mitigation Measure GEO-1 requires a site-specific geotechnical study with recommendations for load-bearing projects to address potential unstable soils, landslide, lateral spreading, subsidence, liquefaction, or collapse during construction. This mitigation measure will ensure that there will not be substantial adverse effects on unstable soils, potential landslide, lateral spreading, subsidence, liquefaction, or collapse. Impacts associated with project construction would be significant and unavoidable when later activities under the *2020 LA River Master Plan* would not be carried out by the County because the County cannot enforce or guarantee that the abovementioned mitigation measure would be implemented by the other agencies. However, if Mitigation Measure GEO-1 is adopted by another agency, the impact would be reduced to less than significant.

3. Impact 3.6(d) (The proposed Project could 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). Mitigation Measure GEO-1 requires a site-specific geotechnical study with recommendations for load-bearing projects to address potential unstable soils, landslide, lateral spreading, subsidence, liquefaction, or collapse during construction. This mitigation measure will ensure that there will not be substantial adverse effects from expansive soils. Impacts associated with project construction and operations would be significant and unavoidable when later activities under the *2020 LA River Master Plan* would not be carried out by the County because the County cannot enforce or guarantee that the abovementioned mitigation measure would be implemented by the other agencies. However, if Mitigation Measure GEO-1 is adopted by another agency, the impact would be reduced to less than significant.
4. Impact 3.6(f) (The proposed Project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature). Mitigation Measure GEO-2 requires implementing agencies to conduct paleontological resource investigations consistent with SVP Guidelines and to identify and determine potential sensitive paleontological resources. This mitigation measure will ensure that there will not be substantial adverse effects on unique paleontological resources and unique geologic features. Mitigation Measure GEO-3 requires that implementing agencies either redesign the subsequent project to avoid sensitive paleontological resources or provide paleontological monitoring. Lastly, Mitigation Measure GEO-4 requires an avoidance and minimization plan to be prepared to avoid/minimize potential impacts on paleontological resources during operations. Impacts associated with project construction would be significant and unavoidable when later activities under the *2020 LA River Master Plan* would not be carried out by the County because the County cannot enforce or guarantee that the abovementioned mitigation measures would be implemented by the other agencies. However, if Mitigation Measures GEO-2, GEO-3, and GEO-4 are adopted by another agency, the impact would be reduced to less than significant.

Greenhouse Gas Emissions

1. Impact 3.7(a) (The proposed Project could generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment). Mitigation Measure GHG-1b will implement operations GHG emission reduction strategies specific to emission sources of multi-use trails and access gateways. This mitigation measure will ensure that there would not be substantial adverse effects on GHGs. Impacts associated with project construction would be significant and unavoidable when later activities under the Typical Projects would not be carried out by the County because the County cannot enforce or guarantee that the abovementioned mitigation measure would be implemented by the other agencies. However, if the mitigation measure (Mitigation Measure GHG-1b) is adopted by another agency, the impact would be reduced to less than significant.
2. Impact 3.7(b) (The proposed Project could conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases). Mitigation Measures GHG-1a requires that implementing agencies implement GHG emission strategies to reduce GHG emissions; Mitigation Measure GHG-1b will implement operations GHG emission reduction strategies specific to emission sources of multi-use trails and access gateways; and Mitigation Measure GHG-2 will minimize waste by encouraging waste reductions. These mitigation measures will ensure that there would not be substantial adverse effects on GHGs. Impacts associated with project construction would be significant and unavoidable when later activities

under the Typical Projects would not be carried out by the County because the County cannot enforce or guarantee that the abovementioned mitigation measures would be implemented by the other agencies. However, if these mitigation measures (Mitigation Measures GHG-1a, GHG-1b, and GHG-2) are adopted by another agency, the impact would be reduced to less than significant.

Hazards and Hazardous Materials

1. Impact 3.8(b): (The proposed Project could 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). Mitigation Measure HAZ-1 requires project-level hazardous materials sites assessment for construction of subsequent projects. This mitigation measure will ensure that there would not be substantial adverse effects from hazards and hazardous waste. Impacts associated with project construction would be significant and unavoidable when later activities under the Typical Projects, KOP Categories 1 through 6, and Overall Master Plan Implementation would not be carried out by the County because the County cannot enforce or guarantee that the abovementioned mitigation measure would be implemented by the other agencies. However, if the Mitigation Measure HAZ-1 is adopted by another agency, the impact would be reduced to less than significant.
2. Impact 3.8(c): (The proposed Project could emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school). Mitigation Measure HAZ-1 requires project-level hazardous materials sites assessment for construction of subsequent projects. This mitigation measure will ensure that there would not be substantial adverse effects from hazards and hazardous waste. Impacts associated with project construction would be significant and unavoidable when later activities under the Typical Projects, KOP Categories 1 through 6, and Overall Master Plan Implementation would not be carried out by the County because the County cannot enforce or guarantee that the abovementioned mitigation measure would be implemented by the other agencies. However, if Mitigation Measure HAZ-1 is adopted by another agency, the impact would be reduced to less than significant.
3. Impact 3.8(d) (The proposed Project could be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment). Mitigation Measure HAZ-1 requires project-level hazardous materials sites assessment for construction of subsequent projects. This mitigation measure will ensure that there would not be substantial adverse effects from hazards and hazardous waste. Impacts associated with project construction would be significant and unavoidable when later activities under the Typical Projects, KOP Categories 1 through 6, and Overall Master Plan Implementation would not be carried out by the County because the County cannot enforce or guarantee that the abovementioned mitigation measure would be implemented by the other agencies. However, if Mitigation Measure HAZ-1 is adopted by another agency, the impact would be reduced to less than significant.
4. Impact 3.8(g) (The proposed Project could expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires). Mitigation Measures WF-2 and WF-3 require that a Construction Fire Protection Plan and a Fire Protection Plan be prepared. Impacts associated with project construction and operations would be significant and unavoidable when later activities under the Typical Projects, KOP Categories 1 through 6, and Overall Master Plan Implementation would not be carried out by the County

because the County cannot enforce or guarantee that the abovementioned mitigation measures would be implemented by the other agencies. However, if Mitigation Measures WF-2 and WF-3 are adopted by another agency, the impact would be reduced to less than significant.

Hydrology and Water Quality

1. Impact 3.9(c) (The proposed Project could 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; substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site; create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows). Mitigation Measures HYDRO-1a and HYDRO-1b require the preparation of site-specific drainage studies and require stormwater control measures for construction and operations of the Common Elements Typical Project; Multi-Use Trails and Access Gateways Typical Project; KOP Categories 1 through 6, Frames 5 through 9; and Overall Master Plan Implementation. These mitigation measures would ensure that there would not be substantial adverse effects on hydrology or water quality. Impacts associated with project construction would be significant and unavoidable when later activities under the *2020 LA River Master Plan* would not be carried out by the County because the County cannot enforce or guarantee that the above-mentioned mitigation measure would be implemented by the other agencies. However, if Mitigation Measures HYDRO-1a and HYDRO-1b are adopted by another agency, the impact would be reduced to less than significant.

Land Use and Planning

1. Impact 3.10(a) (The proposed Project could physically divide an established community). Mitigation Measure LU-2 requires the implementing agency to consult with the applicable municipality to determine if the site proposed for development would divide a community, and Mitigation Measure LU-3 requires the implementing agency to redesign the Project to avoid community connectivity or provide alternative connections during the subsequent design process. These mitigation measures would ensure that there would not be substantial adverse effects on community connectivity. Impacts associated with project operations would be significant and unavoidable when later activities under KOP Category 6 and Overall Master Plan Implementation would not be carried out by the County because the County cannot enforce or guarantee that the above-mentioned mitigation measure would be implemented by the other agencies. However, if Mitigation Measures LU-2 and LU-3 are adopted by another agency, the impact would be reduced to less than significant.

Noise

1. Impact 3.12(a) (The proposed Project could result in a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies). Mitigation Measure NOI-1 requires the implementing agency to prepare a focused noise analysis that identifies sensitive receptors, predicts anticipated construction-related noise levels, and identifies measures that will be implemented by the construction contractor in order to comply with the city's standard. If construction would occur in the City of Vernon, Mitigation Measure NOI-2 would require the implementing agency to apply for and obtain a conditional use permit.

Mitigation Measure NOI-3 would require the contractor to implement noise-reducing practices that would reduce impacts to less than significant. Mitigation Measure NOI-4 would require the implementing agency to prepare a focused noise study and to implement findings to reduce HVAC noise. Mitigation Measure NOI-5 would require the implementing agency to prepare a focused noise study during the final design of the Common Elements Typical Project. Mitigation Measure NOI-6 would require the implementing agency to conduct a noise study that would provide mitigation to reduce impacts to less-than-significant levels, should impacts be identified. These mitigation measures would ensure that there would not be substantial adverse effects from noise on the nearby community. Impacts associated with project construction and operations would be significant and unavoidable when later activities under Common Elements Typical Project (Cities of Maywood, Los Angeles, Long Beach, Carson, Compton, Paramount, South Gate, Cudahy, Bell, Vernon, Glendale, Burbank, and County), KOP Categories 1 through 5 and Overall Master Plan Implementation would not be carried out by the County because the County cannot enforce or guarantee that the above-mentioned mitigation measure would be implemented by the other agencies. However, if these mitigation measures (Mitigation Measures NOI-1 through NOI-6) are adopted by another agency, the impact would be reduced to less than significant.

2. Impact 3.12(b) (The proposed Project could generate excessive groundborne vibration or groundborne noise levels). Mitigation Measure NOI-7 would require the implementing agency to locate any development of the Common Elements Typical Project outside of a distance of 200 feet from any occupied structure or would require the implementing agency to 1) prepare a focused vibration study that analyzes construction vibration sources and predicts vibration levels at nearby vibration sensitive land uses and 2) apply any relevant mitigation measures. NOI-8 would require the implementing agency to locate any development of a Multi-Use Trails and Access Gateways Typical Project outside of a distance of 400 feet from any occupied structure (dependent on phase and construction equipment used) or would require the implementing agency to 1) prepare a focused vibration study that analyzes construction vibration sources and predicts vibration levels at nearby vibration sensitive land uses and 2) apply any relevant mitigation measures. In addition, Mitigation Measure NOI-9 would require implementing agencies to conduct a vibration report and create measures relevant for each project. Impacts associated with project construction would be significant and unavoidable when later activities under the Typical Projects would not be carried out by the County because the County cannot enforce or guarantee that the above-mentioned mitigation measure would be implemented by the other agencies. However, if these mitigation measures (Mitigation Measures NOI-7, NOI-8, and NOI-9) are adopted by another agency, the impact would be reduced to less than significant.

Public Services

1. Impact 3.14(a) (The proposed Project could result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection, police protection, schools, parks, and other public facilities). Mitigation Measure LU-1 would create temporary lane closures, and construction-related traffic could delay or obstruct the movement of emergency vehicles. The Construction Management Plan includes consultation with the fire and police departments for a traffic control plan, allowing for emergency vehicles to prepare for alternate routes if needed.

This mitigation measure would ensure that there would not be substantial adverse effects on public services. Impacts associated with project construction would be significant and unavoidable when later activities under KOP Categories 1 through 6 would not be carried out by the County because the County cannot enforce or guarantee that the above-mentioned mitigation measure would be implemented by the other agencies. However, if Mitigation Measure LU-1 is adopted by another agency, the impact would be reduced to less than significant.

Recreation

1. Impact 3.15(a) (The proposed Project could increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated). Mitigation Measure REC-1 would minimize disruption of recreational uses and allow for recreational users to find similar resources in the area during construction. This mitigation measure would ensure that there will not be substantial adverse effects on recreational resources. Impacts associated with project construction would be significant and unavoidable when later activities for Typical Projects, KOP Categories 1 through 6, and Overall Master Plan Implementation would not be carried out by the County because the County cannot enforce or guarantee that the abovementioned mitigation measure would be implemented by the other agencies. However, if Mitigation Measure REC-1 is adopted by another agency, the impact would be reduced to less than significant.
2. Impact 3.15(b) (The proposed Project could include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment). Throughout all nine frames, the proposed Project would include the construction and operation of recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. Construction could require demolition, grading, and excavation activities and the construction of permanent facilities. These activities would result in a temporary increase in noise and an increase in air quality construction-related emissions. It could also have impacts related to aesthetics, biological resources, cultural resources, geology, hydrology and water quality, land use, traffic, and utilities. Additionally, the operation of new and expanded recreational facilities may result in an adverse physical effect on the environment. Refer to the following sections in the Draft PEIR for detailed descriptions of the proposed Project and potential environmental impacts: 3.1, *Aesthetics*; 3.2, *Air Quality*; 3.3, *Biological Resources*; 3.4, *Cultural Resources*; 3.5, *Energy*; 3.6, *Geology, Soils, and Paleontological Resources*; 3.7, *Greenhouse Gas Emissions*; 3.8, *Hazards and Hazardous Materials*; 3.9, *Hydrology and Water Quality*; 3.10, *Land Use and Planning*; 3.11, *Mineral Resources*; 3.12, *Noise*; 3.13, *Population and Housing*; 3.14, *Public Services*; 3.16, *Transportation*; 3.17, *Tribal Cultural Resources*; 3.18, *Utilities and Service Systems*; and 3.19, *Wildfire*. The impact on recreation would be significant and unavoidable for the resources above for later activities carried out not by the County. However, if identified mitigation measures are adopted by another agency, the impact would be reduced to less than significant.

Transportation

1. Impact 3.16(a) (The proposed Project could conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities). Mitigation Measure LU-1 would manage construction parking and traffic flows and would

ensure that there would not be substantial adverse effects on transportation. Impacts associated with project construction for Typical Projects, KOP Categories 1 through 6, and the Overall Master Plan Implementation would be significant and unavoidable when later activities under the *2020 LA River Master Plan* would not be carried out by the County because the County cannot enforce or guarantee that the abovementioned mitigation measure would be implemented by the other agencies. However, if Mitigation Measure LU-1 is adopted by another agency, the impact would be reduced to less than significant.

2. Impact 3.16(b) (The proposed Project could conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b)). Mitigation Measure LU-1 would manage construction parking and traffic flows and would ensure that there would not be substantial adverse effects on transportation. Impacts associated with project construction for Typical Projects, KOP Categories 1 through 6, and the Overall Master Plan Implementation would be significant and unavoidable when later activities under the *2020 LA River Master Plan* would not be carried out by the County because the County cannot enforce or guarantee that the abovementioned mitigation measure would be implemented by the other agencies. However, if Mitigation Measure LU-1 is adopted by another agency, the impact would be reduced to less than significant.
3. Impact 3.16(c)/(d) (The proposed Project could substantially increase hazards because of a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or result in inadequate emergency access). Mitigation Measure LU-1 would manage construction parking and traffic flows and would ensure that there would not be substantial adverse effects on transportation. Impacts associated with project construction for Typical Projects, KOP Categories 1 through 6, and the Overall Master Plan Implementation would be significant and unavoidable when later activities under the *2020 LA River Master Plan* would not be carried out by the County because the County cannot enforce or guarantee that the abovementioned mitigation measure would be implemented by the other agencies. However, if Mitigation Measure LU-1 is adopted by another agency, the impact would be reduced to less than significant.

Utilities/Service Systems

1. Impact 3.18(d) (The proposed Project could 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). Mitigation Measure UTIL-3 requires implementing agencies to recycle construction materials and incentivizes construction contractors with waste minimization goals. Mitigation Measure UTIL-4 requires every project under KOP Category 6 to reduce the amount of solid waste generated from operation of the Project. Impacts associated with project construction and operations for KOP Category 6 and Overall Master Plan Implementation would be significant and unavoidable when later activities under the *2020 LA River Master Plan* would not be carried out by the County because the County cannot enforce or guarantee that the abovementioned mitigation measures would be implemented by the other agencies. However, if Mitigation Measures UTIL-3 and UTIL-4 are adopted by another agency, the impact would be reduced to less than significant.

Wildfire

1. Impact 3.19(a) (The proposed Project could substantially impair an adopted emergency response plan or emergency evacuation plan). Mitigation Measure WF-1 would minimize

potential construction impacts on emergency response requirements of relevant police and fire departments. This mitigation measure would ensure that there would not be substantial adverse effects on emergency response and evacuation plans. Impacts associated with project construction for Typical Projects, KOP Categories 1 through 6, and the Overall Master Plan Implementation would be significant and unavoidable when later activities under the *2020 LA River Master Plan* would not be carried out by the County because the County cannot enforce or guarantee that the abovementioned mitigation measure would be implemented by the other agencies. However, if Mitigation Measure WF-1 is adopted by another agency, the impact would be reduced to less than significant.

2. Impact 3.19(b) (The proposed Project could, due to slope, prevailing winds, and other factors, exacerbate wildfire risks of, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire). Mitigation Measure WF-2 would minimize potential construction impacts in Very High FHSZs areas. This mitigation measure would ensure that there would not be substantial adverse effects on emergency response and evacuation plans. Impacts associated with project construction for Typical Projects, KOP Categories 1 through 6, and the Overall Master Plan Implementation would be significant and unavoidable when later activities under the *2020 LA River Master Plan* would not be carried out by the County because the County cannot enforce or guarantee that the abovementioned mitigation measure would be implemented by the other agencies. However, if Mitigation Measure WF-2 is adopted by another agency, the impact would be reduced to less than significant.
3. Impact 3.19(c) (The proposed Project could 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 result in temporary or ongoing impacts on the environment). Mitigation Measure WF-2 would minimize potential construction impacts in Very High FHSZs areas. This mitigation measure would ensure that there would not be substantial adverse effects on emergency response and evacuation plans. Impacts associated with project construction for Typical Projects, KOP Categories 1 through 6, and the Overall Master Plan Implementation would be significant and unavoidable when later activities under the *2020 LA River Master Plan* would not be carried out by the County because the County cannot enforce or guarantee that the abovementioned mitigation measure would be implemented by the other agencies. However, if Mitigation Measure WF-2 is adopted by another agency, the impact would be reduced to less than significant.
4. Impact 3.19(d) (The proposed Project could 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). Mitigation Measure WF-4 ensures that if a project is in Very High FHSZs or an area that was recently burned by wildfire, then the implementing agency will prepare a post-fire risk reduction plan. Mitigation Measure HYDRO-1a would require site-specific drainage studies to address stormwater management. Mitigation Measure GEO-1 would require site-specific geotechnical studies and implementation of their recommendations prior to beginning construction activities. This mitigation measure will ensure that there will not be substantial adverse effects on emergency response and evacuation plans. Impacts associated with project construction for Common Elements Typical Project, KOP Categories 1 through 5, and the Overall Master Plan Implementation would be significant and unavoidable when later activities under the *2020 LA River Master Plan* would not be carried out by the County because the County cannot enforce or guarantee that the abovementioned mitigation measures would be

implemented by the other agencies. However, if Mitigation Measures HYDRO-1a, GEO-1, and WF-4 are adopted by another agency, the impact would be reduced to less than significant.

Findings

The County finds and determines that it has considered the identified means of lessening or avoiding the Project's significant effects and that to the extent any significant direct or indirect environmental effect, including cumulative project impacts, remain unavoidable or not reduced to below a level of significance after mitigation, such impacts are at an unacceptable level in light of the social, legal, economic, environmental, technological, and other project benefits discussed below, and such benefits override, outweigh, and make "acceptable" any such remaining environmental impacts of the project (CEQA Guidelines Section 15092(b)).

Specifically, the following benefits and considerations outweigh the identified significant and unavoidable adverse environmental impacts. All of these benefits and considerations are based on the facts set forth in the findings, the Final PEIR, and the record of proceedings for the proposed Project. Each of these benefits and considerations is a separate and independent basis that justifies approval of the proposed Project, so that if a court were to set aside the determination that any particular benefit or consideration would occur and justifies project approval, the County would otherwise stand by its determination that the remaining benefit(s) or considerations are sufficient to justify and substantiate project approval.

Facts

The County makes this statement of overriding considerations in accordance with CEQA Guidelines Section 15093 in support of approval of the Project. Specifically, in the County's judgment, the benefits of the Project, as proposed, outweigh the significant and unavoidable impacts, and the Project should be approved. The following provides the Project benefits:

1. Implementation of the proposed Project would provide hundreds of acres of publicly accessible open space in some of the County's most park-poor communities.
2. Implementation of the proposed Project would reduce flood risk along the LA River and add resilience measures for communities within the river's floodplains.
3. Implementation of the proposed Project would reduce the need for flood insurance in certain communities where flood risk is greatest.
4. Implementation of the proposed Project would reduce the impacts of flooding and increase floodplain resilience for future flooding events.
5. Implementation of the proposed Project will help LA County and other participating municipalities conserve local stormwater for increased groundwater recharge, creating a more reliable water supply portfolio for residents in LA County.
6. Implementation of the proposed Project will help mitigate causes of preventable health conditions such as asthma and obesity through increased access to open space and improved air quality.
7. Implementation of the proposed Project would provide jobs and training for local communities.
8. Implementation of the proposed Project would increase vegetation and canopy cover along and adjacent to the LA River.

9. Implementation of the proposed Project would promote species biodiversity through the use of native plant communities in the *2020 LA River Master Plan Design Guidelines*.
10. Implementation of the proposed Project would promote the establishment of habitat areas through the use of native plant communities in the *2020 LA River Master Plan Design Guidelines*.
11. Implementation of the proposed Project would offer support for persons experiencing homelessness and parallel assistance for affordable housing.
12. Implementation of the proposed Project would help increase housing stability for neighborhoods that are experiencing high rates of rent burden.
13. Implementation of the proposed Project would assist with wayfinding along and adjacent to the LA River Trail.
14. Implementation of the proposed Project would provide opportunities for active transportation, reducing VMT and carbon emissions.
15. Implementation of the proposed Project would change the focus from development and increasing property values to housing stability and helping residents thrive in place.
16. Implementation of the proposed Project would increase units of affordable housing.
17. Implementation of the proposed Project would help cities and other agencies to achieve compliance with requirements of federal and state water quality laws and related requirements.
18. Implementation of the proposed Project would result in improved water quality in receiving waters throughout the LA River watershed—including the major rivers, streams, and the ocean—through the retention, detention, or treatment of stormwater and dry weather flow.
19. Implementation of the proposed Project would enhance LA County’s arts and cultural assets, particularly in areas where the need for these assets is greatest.
20. Implementation of the proposed Project would benefit communities within the County in developing multi-benefit facilities to improve water quality, provide park space, increase habitat and native vegetation, and improve equitable access to the LA River and other open space amenities.
21. Implementation of the proposed Project will assist the County in securing a more reliable water supply through local resource management and water conservation measures, including without limitation, augmenting local groundwater supplies with captured stormwater.
22. Implementation of the proposed Project encourages nature-based systems to help improve water quality and increase local water supplies.
23. Implementation of the proposed Project will increase community awareness through specific education and outreach efforts focused on flood risk, park space, ecosystems, accessibility, equity, arts and culture, housing and homelessness, water quality, and water supply.
24. Implementation of the proposed Project would help support and be consistent with the State of California Ocean Plan, promoting improved ocean water quality for multiple beneficial uses.
25. Implementation of the proposed Project would help support and be consistent with the Upper Los Angeles River and Lower Los Angeles River Enhanced Watershed Management Plans and Watershed Management Plans (E/WMP).

26. Implementation of the proposed Project would provide more equitable access to and along the LA River corridor.
27. Implementation of the proposed Project would be consistent with the stated goals and policies of the Los Angeles Region Basin Plan prepared by the Regional Water Quality Control Board pursuant to California Water Code Section 13240.
28. Implementation of the proposed Project would promote and be consistent with the County of Los Angeles 2014 Low Impact Development Standards Manual.
29. Implementation of the proposed Project would promote and be consistent with the County of Los Angeles OurCounty Sustainability Plan.
30. Implementation of the proposed Project would support persons experiencing homelessness through compassionate practices, outreach services, and increases in temporary and permanent supportive housing.
31. Implementation of the proposed Project would prioritize investment in historically underserved communities.
32. Implementation of the proposed Project would require engagement with local communities for County river projects.

Having considered the benefits outlined above, the County finds that each individual benefit set forth above constitutes an overriding consideration warranting approval of the Project, independent of the other benefits, despite each and every significant and unavoidable impact. The County determines that the significant and unavoidable environmental impacts of the Project are “acceptable” if any one of these benefits will be realized. Each of these benefits is based on substantial evidence set forth in the CEQA Findings, the Final PEIR, and/or the record of proceedings for the Project.