Chapter 4
Other CEQA Considerations

This chapter addresses the potential for additional consequences related to the implementation of the *2020 LA River Master Plan*, pursuant to State CEQA Guidelines Sections 15126 and 15128. Specifically, this chapter (1) discusses significant effects of the Project that cannot be avoided if the Project is implemented (Section 4.1); (2) addresses significant irreversible changes to the environment that would result from implementation of the *2020 LA River Master Plan* (Section 4.5); (3) discusses the environmental effects of the *2020 LA River Master Plan* that were determined not to be significant (Sections 4.2 and 4.3); and (4) discusses the potential for growth-inducing impacts of the *2020 LA River Master Plan*, which pertains to ways in which the *2020 LA River Master Plan* could promote either direct or indirect growth (Section 4.4). Mitigation measures proposed to minimize the significant effects are discussed in Chapter 3, *CEQA Environmental Impact Assessment*, and alternatives to the proposed Project are discussed in Chapter 5, *Alternatives*. Cumulative impacts are presented in Chapter 3 under each resource topic.

Except for significant and unavoidable impacts, all identified significant environmental effects of the proposed *2020 LA River Master Plan* can be avoided or reduced to a less-than-significant level if the mitigation measures identified in this PEIR are implemented. These mitigation measures will be implemented for subsequent projects that are carried out by the County. Because some later activities under the *2020 LA River Master Plan* would not be carried out by the County, the County cannot enforce or guarantee that the mitigation measures would be incorporated. Therefore, where this PEIR concludes a less-than-significant impact for later activities carried out by the County, the impact would be significant and unavoidable when these activities are not carried out by the County.

4.1 Significant Unavoidable Adverse Environmental Impacts

Significant unavoidable impacts would occur as a result of the proposed Project in the following resource areas, regardless of whether later activities are carried out by the County or another jurisdiction (i.e. one of the 17 cities in the study area):

- Aesthetics
- Air Quality
- Cultural Resources
- Greenhouse Gas Emissions
- Land Use and Planning
- Noise
- Public Services
- Transportation
- Tribal Cultural Resources

- Utilities/Services Systems
- Wildfire

4.1.1 Aesthetics (Section 3.1)

4.1.1.1 Scenic Vistas (Impact 3.1(a))

Construction

None.

Operation

Operations impacts from kit of parts (KOP) Category 6 would include introducing a broad range of civic amenities to the viewshed, including flood management, recreational improvements, affordable housing, cultural centers, urban agriculture/composting, water storage, water treatment facilities, dry wells, spreading grounds, purple pipe connections, storm drain daylighting, injection wells, solar panels, fields, and parks. Scenic vistas within the project study area are limited in nature, with the viewshed largely consisting of an urban hardscape with limited scenic resources. However, aboveground structures related to KOP Category 6, if constructed in an area encompassing a scenic vista, could result in a substantial adverse effect on a scenic vista or could obscure a panoramic view. Because the size, extent, and specific location of subsequent design components under KOP Category 6 are not yet known, it is possible that KOP Category 6 could substantially block or obstruct scenic vistas such as views of the ocean, ridgelines, and open space areas. Even with implementation of Mitigation Measure AES-2, designed to minimize the obstruction of scenic vistas, the impact could remain significant and unavoidable.

This conclusion of significant and unavoidable impacts also applies to the overall *2020 LA River Master Plan*.

4.1.2 Air Quality (Section 3.2)

4.1.2.1 Criteria Pollutants (Impact 3.2(b))

Construction

Projects under the KOP categories would likely be substantially larger than the Typical Projects. Construction of the six KOP categories would result in the generation of air pollutant emissions from heavy-duty construction equipment, construction worker vehicle trips, material deliveries, trips by heavy-duty haul trucks, earthwork activities, and other construction activities. Such emissions could exceed construction thresholds for regional and localized pollutant emissions depending on the schedules, equipment used, and material movement required. This conclusion of significant and unavoidable impacts for construction also applies to the overall *2020 LA River Master Plan*.

Operation

Operation of KOP Categories 1 through 6 would generate air pollutant emissions associated with motor vehicle trips, onsite consumption of natural gas for space and water heating, onsite use of solvents and consumer products, landscaping, and other sources. Emissions could exceed

operational thresholds for regional and localized pollutant emissions depending on project details. Although Mitigation Measures AQ-2, GHG-1a, and TRA-1b would control emissions during both construction and operation periods under the six KOP categories, it cannot be stated with certainty that emissions would be below applicable regional or localized emissions thresholds. Therefore, with mitigation the impact could be significant and unavoidable. This conclusion of significant and unavoidable impacts for operation also applies to the overall *2020 LA River Master Plan*.

4.1.2.2 Sensitive Receptors (Impact 3.2(c))

Construction

For the Typical Projects and KOP categories, without specific details on the locations of construction activities, it is conservatively assumed that there may be instances where diesel particulate matter emissions could result in cancer or non-cancer health risks that exceed the South Coast Air Quality Management District's (SCAQMD's) thresholds. Because it cannot be concluded what the result of the subsequent project-level evaluation will be without speculation, it is possible that mitigation for future project health risks may be inadequate to reduce construction impacts below SCAQMD's threshold level. Therefore, even with implementation of Mitigation Measures AQ-1, AQ-3, and GHG-2, this impact could be significant and unavoidable. This conclusion of significant and unavoidable impacts for the construction period also applies to the overall *2020 LA River Master Plan*.

Operation

During the operations period for the Typical Projects and KOP categories, criteria pollutant emissions would not expose receptors to substantial pollutant concentrations or risk. It is not anticipated that the Common Elements Typical Project would exceed the most stringent 1-hour carbon monoxide standard and no detailed carbon monoxide hot-spots analysis would be required. However, without specific details on the locations of building footprints, it is conservatively assumed that there may be instances where diesel particulate matter emissions from operations could result in cancer or non-cancer health risks that exceed SCAQMD's thresholds. Because it cannot be concluded what the result of the project-level evaluation will be without speculation, it is possible that Mitigation Measures AQ-2, AQ-3, GHG-1a, and TRA-1b may be inadequate to reduce operations impacts below SCAQMD's threshold level. For KOP Category 6, an additional mitigation measure (Mitigation Measure AQ-4) is required due to the potential siting of sensitive receptors in close proximity to existing toxic air contaminant hazards. Therefore, even with implementation of Mitigation Measures AQ-2, AQ-3, GHG-1a, and TRA-1b (and AQ-4 for KOP Category 6), this impact could be significant and unavoidable. This conclusion of significant and unavoidable impacts for the operation period also applies to the overall *2020 LA River Master Plan*.

4.1.3 Cultural Resources (Section 3.4)

4.1.3.1 Historical Resources (Impact 3.4(a))

Construction

Construction of the Typical Projects and KOP categories would involve site disturbance, movement of construction equipment, and import and export of materials to build facilities such as cafés, pavilions, restrooms, multi-use trails, and art/performance spaces. Ground disturbance would include site clearing and excavation. Excavation would be a maximum depth of 7 feet below ground

surface (bgs) to construct pavilions and install footings for bollards, lighting, or fences and generally 2 feet bgs for trails. New construction has the potential to cause ground disturbance, demolish historical resources or alter character-defining features of historical resources, and/or make changes to the setting of historical resources, a potentially significant impact. Implementation of Mitigation Measures CR-1a and b and CR-2a through c would help reduce the impacts on cultural resources; however, given that the specific locations of Typical Projects and KOP categories and the presence of significant historical resources as well as the potential effects on the resources are not known at this time, it is conservatively assumed that the impacts could be significant and unavoidable. This conclusion of significant and unavoidable impacts for the construction period also applies to the overall *2020 LA River Master Plan*.

Operation

During operations of the Typical Projects and KOP categories, there is the potential to cause substantial adverse change in the significance of historical resources. Impacts could include damage to historical resources due to water and/or waste leakages from hygiene facilities, restrooms, and/or water features, for example. Furthermore, if historical resources are integrated into the design of the proposed Project, increased foot traffic could affect the integrity of material. Depending on the project design and location, presence or absence of historical resources, and character-defining features of the historical resource (facts anticipated to become available as individual projects are proposed under the *2020 LA River Master Plan*), implementation of Mitigation Measures CR-3a through c may not be enough to reduce the impact; therefore, the impacts could be significant and unavoidable. This conclusion of significant and unavoidable impacts for the operation period also applies to the overall *2020 LA River Master Plan*.

4.1.3.2 Archaeological Resources (Impact 3.4(b))

Construction

As discussed above for historical resources, construction of the Typical Projects and KOP categories would generally involve site disturbance, movement of construction equipment, and import and export of materials. Construction would occur along the right-of-way, include an area of approximately 3 acres (for the Common Elements Typical Project) or up to 40 acres (for the Multi-Use Trails and Access Gateways Typical Project), and last about 10 to 20 months, respectively. Ground disturbance would include site clearing and excavation to a maximum depth of 7 feet bgs to construct pavilions and install footings for bollards, lighting, or fences and generally 2 feet bgs for trails. Previously recorded or unrecorded California Register of Historical Resources–eligible archaeological resources could be present within the area of potential impact of subsequent projects.

Although implementation of Mitigation Measures CR-1a-b, CR-4a through d, and CR-5 would help reduce the impacts, the specific locations of Typical Projects and presence of significant archaeological resources as well as the Typical Projects' effects on the resources are not known at this time. Therefore, for the purposes of this PEIR, impacts are considered to be significant and unavoidable. This conclusion of significant and unavoidable impacts for the construction period also applies to the overall *2020 LA River Master Plan*.

Operation

Operations activities related to the Typical Projects and KOP categories could include operation of new single-story structures such as pavilions and cafés, restrooms, or lower-profile infrastructure such as multi-use trails, signs, lighting, benches, and other associated recreational facilities, which could introduce activities that could directly affect archaeological resources. Operational elements such as increased erosion along proposed trail alignments, facilities, and recreational areas could result from increased public use. Additionally, introducing recreationists and trail users near new facilities associated with the Typical Projects near a California Register of Historical Resources–eligible archaeological resource could directly affect the resources either through exposure and removal from unanticipated disturbance or increased looting potential due to increased use, and otherwise negatively affect the integrity of the resource. Although implementation of Mitigation Measures CR-5 and CR-6 would help reduce the impacts, the specific locations of Typical Projects and presence of significant archaeological resources as well as the Typical Projects' effects on the resources are not known at this time. Therefore, it was concluded impacts would remain significant and unavoidable. This conclusion of significant and unavoidable impacts for the operation period also applies to the overall *2020 LA River Master Plan*.

4.1.3.3 Human Remains (Impact 3.4(c))

Construction

Existing cemeteries are not anticipated for incorporation into any of the proposed project scenarios for the Typical Projects and KOP categories. However, there is potential for previously unknown prehistoric to historic-period burials and unmarked cemeteries to be located in the project study area. Construction of the Typical Projects would generally involve site disturbance, movement of construction equipment, and import and export of materials. Any disturbance of human remains is considered significant. Although implementation of Mitigation Measure CR-7 would help reduce the impacts, the specific locations of Typical Projects and potential presence of unknown human remains as well as the Typical Projects' effects on the remains are not known at this time. Therefore, impacts could be significant and unavoidable. For the overall *2020 LA River Master Plan*, Mitigation Measures CR-1a-b, CR-4a through d, and CR-5 are also required, but the impact would remain significant and unavoidable.

Operations

Operations activities related to the Typical Projects could introduce or increase public use activities such as increased erosion along proposed trail alignments, facilities, and recreational areas. Additionally, introducing recreationists and trail users near new facilities associated with the Typical Projects near buried human remains could indirectly affect the resources either through exposure and removal from unanticipated disturbance or increased looting potential due to increased use, and otherwise negatively affect the integrity of the resource. Although implementation of Mitigation Measure CR-7 would help reduce the impacts, the specific locations of Typical Projects and presence of human remains as well as the Typical Projects' effects on the remains are not known at this time. Therefore, it was concluded that impacts could be significant and unavoidable. For the KOP categories, Mitigation Measures CR-5 and CR-6 are also required; however, for purposes of this PEIR (and lack of site-specificity similar to the Typical Projects), impacts are considered to be significant and unavoidable. This conclusion of significant and unavoidable impacts for the operation period also applies to the overall *2020 LA River Master Plan*.

4.1.4 Greenhouse Gas Emissions (Section 3.7)

4.1.4.1 Generate GHG Emissions (Impact 3.7(a))

Construction and Operation

The significance determination of greenhouse gas (GHG) emissions from the Project is based on a sector-by-sector analysis using the most applicable regulatory programs, policies, and thresholds recommend by the California Air Resources Board and the California Governor's Office of Planning and Research. The significance determination is based on the combined GHG emissions generated by both project construction activities and operations activities; therefore, the construction and operations impact determination is combined. In addition, as project emissions would not vary based on the planning frame and the regulatory programs analyzed are not specific to any one frame, the analysis provided in Section 3.7 was applied equally to projects in all nine frames.

The Common Elements Typical Projects would be consistent with the 2017 Scoping Plan's overall goal of avoiding losses in carbon sequestration and limiting land use emissions. The *2020 LA River Master Plan* Design Guidelines (Design Guidelines; as described in Chapter 2, *Project Description*, and included in Appendix B) for the Common Elements Typical Project related to water, energy, and waste, if implemented, would be consistent with the 2017 Scoping Plan's 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 Common Elements Typical Project 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.

With implementation of Mitigation Measure GHG-1a, compliance with a minimum of the Design Guidelines for the Common Elements Typical Project 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 other feasible mitigation measures that would reduce mobile-source VMT emissions to a less-than-significant level are available at this time. Therefore, emissions associated with both the construction and operation phases of the Common Elements Typical Project 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 would remain significant and unavoidable.

This conclusion of significant and unavoidable impacts also applies to the overall *2020 LA River Master Plan*.

4.1.4.2 Plan Consistency (Impact 3.7(b))

Construction and Operation

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 Project, discussion of the plan consistency has been combined.

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. Even with mitigation, impacts would remain significant and unavoidable.

This conclusion of significant and unavoidable impacts also applies to construction and operation of the overall *2020 LA River Master Plan*.

4.1.5 Land Use and Planning (Section 3.10)

4.1.5.1 Divide an Established Community (Impact 3.10(a))

KOP Category 6 and Overall 2020 LA River Master Plan Implementation

Construction

Off-channel land asset projects would likely entail greater levels of construction for KOP Category 6 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. Site-specific and project-specific design details of subsequent projects would determine their construction schedules and would ultimately be driven by the County's needs or the needs of any other jurisdictions implementing these projects under the *2020 LA River Master Plan*. 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.

Operation

None.

4.1.5.2 Conflicts with Applicable Land Use Plans, Policies, or Regulations (Impact 3.10(b))

Construction

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. As it is unknown the location and extent of design components under KOP Category 6, there could be inconsistencies with applicable land use plans, policies, and regulations, a potentially significant impact. 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 *2020 LA River Master Plan*.

Operation

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 and therefore would not be expected to result in inconsistency with the goals listed in Table 3.10-7. As it is unknown the location and extent of subsequent projects that could operate under KOP Category 6, in the absence of specific details (e.g., type of project, detailed design, location, size), it cannot be stated with certainty whether there would be inconsistencies with applicable land use plans, policies, or regulations. However, 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 *2020 LA River Master Plan*.

4.1.6 Noise (Section 3.12)

4.1.6.1 Increase in Ambient Noise Levels (Impact 3.12(a))

Construction

The specific location and design for KOP Category 6 design components have not been determined yet and would depend on numerous factors including location of the improvements, type of construction equipment, project proponent, and availability of funding. Considering this KOP category includes a variety of construction activities including but not limited to up to 107 potential projects ranging in size from extra-small (less than 1 acre) to extra-large (150+ acres/10+ miles) that would be implemented over the 25-year horizon period to meet the *2020 LA River Master Plan*'s nine objectives, construction impacts of KOP Category 6 cannot be directly quantified, as the specific locations are not known. Therefore, based on the jurisdictions in which the KOP Category 6 design components could occur and the possibility that noise-sensitive land uses may exist in the immediate vicinity of construction sites, construction could result in potentially significant impacts. Inclusion of Mitigation Measures NOI-1 through NOI-3 and compliance with the jurisdictional codes and planning documents would reduce impacts. However, with the uncertainty as to the location and extent of design components associated with this KOP category, it is possible that impacts may not be mitigated below significance. As such, construction impacts from KOP Category 6 could be significant and unavoidable.

Operation

Potential impacts from operation of the design components under KOP Category 6 would vary depending on the specific design component and its intended function, as well as on the specific location. As described in Chapter 2, *Project Description*, this KOP category could include affordable housing, cultural centers, urban agriculture/composting, water storage, water treatment facilities, dry wells, spreading grounds, purple pipe connections, storm drain daylighting, injection wells, solar panels, fields, and parks. Considering the uncertainty associated with the location, surrounding potential land uses, and general activity that could occur at these locations as they relate to noise, quantification of these types of impacts is not known and not discernable at this time. Inclusion of Mitigation Measure LU-4, preparation of a focused noise study, and implementation of site-specific mitigation measures identified in that noise study would reduce impacts. However, with the uncertainty as to the location and extent of design components associated with this KOP category, it is possible that impacts may not be mitigable. As such, operational impacts from KOP Category 6 could be significant and unavoidable.

For similar reasons, even with implementation of Mitigation Measures NOI-1 through NOI-5, operational impacts could remain significant and unavoidable for the overall *2020 LA River Master Plan*.

4.1.6.2 Groundborne Vibration (Impact 3.12(b))

Construction

The specific design for KOP Category 6 design components have not been determined and would depend on numerous factors including location of the improvements, type of construction equipment, project proponent, and availability of funding. Considering this KOP category includes a

variety of construction activities including but not limited to affordable housing, recreation fields, urban agriculture/composting, and arts and culture facilities, construction impacts of KOP Category 6 cannot be directly quantified, as the specific locations are not known. Therefore, depending on the jurisdiction in which the KOP Category 6 design component occurs and the presence or absence of vibration-sensitive uses in the immediate project vicinity, construction could result in potentially significant impacts. Inclusion of Mitigation Measure NOI-7 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-6 through NOI-8, construction impacts could remain significant and unavoidable for the overall *2020 LA River Master Plan*.

Operation

None.

4.1.7 Public Services (Section 3.14)

4.1.7.1 Provision of New or Physically Altered Government Facilities (Impact 3.14(a))

Construction

It is anticipated that approximately 107 projects ranging in size from extra-small (less than 1 acre) to extra-large (150+ acres/10+ miles) would be implemented over the 25-year period to meet the nine objectives of the *2020 LA River Master Plan*. These would include the Typical Projects that would be implemented along the river, and subsequent projects composed of the KOP categories' multi-benefit design components. There may be localized road closures and detours that could increase response times for emergency services. Mitigation Measure LU-1 would minimize construction impacts; however, because the size, extent, and location of the projects are unknown, impacts could remain significant and unavoidable for police and fire services. This conclusion of significant and unavoidable impacts for the construction phase also applies to the overall *2020 LA River Master Plan.*

Operation

The 107 projects under the *2020 LA River Master Plan* would be constructed in accordance with current building and fire/life/safety ordinance and codes, including all applicable jurisdictional code requirements related to construction, access, water mains, fire flows, and hydrants. The majority of the KOP categories include recreational components or provide opportunities for recreational uses such as parks and trails, farmer's markets, soccer fields, and amphitheaters. Operation of KOP Categories 1 through 6 could result in a substantial increase of daily users such that there could be an increase in demand on police or fire protection services. Increases in the number of visitors and residents could result in more incidents requiring police and fire response, which could affect police provider service ratios and response times and necessitate additional law enforcement staff. Because the overall size, extent, and location of the projects are unknown, even with

implementation of Mitigation Measure PS-1, operation impacts from a need for more patrols or other areas that have coverage issues could remain significant and unavoidable for police and fire protection. This conclusion of significant and unavoidable impacts for the operation phase also applies to the overall *2020 LA River Master Plan*.

4.1.8 Recreation (Section 3.15)

4.1.8.1 Require Construction of Recreational Facilities (Impact 3.15(b))

Construction

Throughout all nine frames, the Typical Projects, KOP categories, and the overall *2020 LA River Master Plan* would include the construction 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 construction could include permanent facilities. These construction activities would result in a temporary increase in noise and an increase in air quality construction-related emissions. They could also have impacts on aesthetics, biological resources, cultural resources, geology, hydrology and water quality, land use, traffic, and utilities. Refer to Sections 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*, for detailed descriptions and potential construction impacts that could be significant and unavoidable.

Operations

Similar to construction impacts, throughout all nine frames, the Typical Projects, KOP categories, and the overall *2020 LA River Master Plan* would include the operation of recreational facilities that might have an adverse physical effect on the environment. Operation of new recreational facilities could attract new users and operations and maintenance staff. Refer to Sections 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*, for detailed descriptions and potential operational impacts that could be significant and unavoidable.

4.1.9 Transportation (Section 3.16)

4.1.9.1 Conflict or Be Inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b) (Impact 3.16(b)).

Construction

None.

Operation

Tables 3.16-2 and 3.16-3 in Section 3.16, *Transportation*, of this PEIR show all of the design components that could be constructed for the Typical Projects and KOP categories. As shown in these two tables, the majority of the design components are screened from VMT analysis and therefore would result in a less-than-significant impact. However, the following 10 design components were not screened out and were determined to have the potential to result in a significant VMT impact:

- Tier III Pavilions (Common Elements Typical Project)
- Art/Performance Spaces (Common Elements Typical Project)
- Equestrian Facility (KOP Category 1)
- Terraced Banks (KOP Category 2)
- Platform (KOP Category 3)
- Side Channel (KOP Category 4)
- Fields (KOP Category 5)
- Recreation Fields (KOP Categories 5 and 6)
- Urban Agriculture/Composting (KOP Category 6)
- Art and Culture Facilities (KOP Category 6)

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 *2020 LA River Master Plan*, significant VMT impacts may not be fully mitigable even with TDM measures (Mitigation Measure TRA-1b). As such, impacts could remain significant and unavoidable.

4.1.10 Tribal Cultural Resources (Section 3.17)

4.1.10.1 Substantial Adverse Change in the Significance of a TCR (Impact 3.17(a))

Construction

Construction of the Typical Projects would involve site disturbance, movement of construction equipment, and import and export of materials. Construction would occur along the right-of-way and include an area of approximately 3 acres (for the Common Elements Typical Project) or up to 40 acres (for the Multi-Use Trails and Access Gateways Typical Project) and last about 10 to 20 months, respectively. Excavation would be a maximum depth of 7 feet bgs to construct pavilions and install footings for bollards, lighting, or fences and generally 2 feet bgs for trails. A Sacred Lands File search conducted through the Native American Heritage Commission on March 12, 2020, identified positive

results on two U.S. Geological Survey quadrangles that intersect Frames 5, 6, and 9 within the project study area. In addition, other sensitive areas may be identified through ongoing consultation with Native American tribes. Therefore, surface-exposed or buried cultural materials, cultural objects, or landscapes determined to be tribal cultural resources (TCRs) have been identified in Frames 5, 6, and 9, but yet-to-be-identified TCRs could be present within all nine frames and construction of the Typical Projects could cause a substantial adverse change in the significance of a TCR, if present.

Although implementation of Mitigation Measures CR-1, CR-4a through d, and CR-5 (as discussed in Section 3.4, *Cultural Resources*, of this PEIR) would help reduce the impacts, the specific locations of Typical Projects and presence of TCRs as well as the Typical Projects' effects on TCRs are not known at this time. Therefore, it is possible that construction impacts for Typical Projects, based on the specific TCR, could remain significant and unavoidable.

As with the Typical Projects discussed above, the six KOP categories would be implemented over a period of 25 years, depending on such factors as availability of funding and necessary approvals. The construction activities proposed under all the KOP categories could result in significant impacts on TCRs. The Native American Heritage Commission identified positive results on two U.S. Geological Survey quadrangles that intersect the study area. These occur in Frames 5, 6, and 9. Other sensitive areas may be identified through ongoing consultation in any frame. Although implementation of Mitigation Measures TCR-1, TCR-2, CR-1, CR-4a through d, and CR-5 could help reduce the impacts, the specific locations of subsequent design components under the six KOP categories and presence of TCRs as well as the subsequent projects' effects on TCRs are not known at this time. Therefore, it is possible that construction impacts from KOP Categories 1 through 6 could remain significant and unavoidable.

Operation

The Typical Projects could include new single-story structures, such as pavilions, cafés, and restrooms, or lower-profile infrastructure, such as multi-use trails, signs, lighting, benches, and other associated recreational facilities that could interfere with or otherwise adversely affect the setting or viewshed of a nearby TCR, which could indirectly affect the integrity of the resource. Operational impacts, such as increased erosion along proposed trail alignments, facilities, and recreational areas, could result from increased public use. Additionally, introducing recreationists and trail users in new facilities associated with a Typical Project near a potentially significant TCR could directly affect TCRs, through unanticipated destruction of in-situ TCRs, or otherwise negatively affect the integrity of the resource. These activities could result in the exposure, disturbance, and potential destruction through damage or removal of existing resources and previously unrecorded TCRs.

Similar to construction-related impacts on TCRs, although implementation of Mitigation Measures TCR-3 and TCR-4 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 operational impacts for Typical Projects could remain significant and unavoidable.

Potential impacts from operation of the design components under the KOP categories would vary depending on the specific design component and its intended function, as well as on the specific location, including in-channel or off-channel. The specific location and design for these components have not been determined yet and would depend on numerous factors, including project proponent and availability of funding. The operation of the KOP categories could result in significant impacts on

TCRs, which include increased erosion along proposed trail alignments, facilities, and recreational areas from increased public use. These activities could result in the exposure, disturbance, and potential destruction through damage or removal of existing resources and previously unrecorded TCRs.

Although implementation of Mitigation Measures TCR-3 and TCR-4 could help reduce the impacts, the specific locations of subsequent design components under the six KOP categories and presence of TCRs, as well as the subsequent projects' effects on TCRs, are not known at this time. Therefore, it is possible that operational impacts of the KOP categories could remain significant and unavoidable.

This conclusion for the operation phase also applies to the overall *2020 LA River Master Plan*.

4.1.11 Utilities/Service Systems (Section 3.18)

4.1.11.1 Relocation or Construction of New or Expanded Utility Facilities (Impact 3.18(a))

Construction

None.

Operation

During operation of the six KOP categories, there are numerous resource master plans that are applicable to the study area that consider planned growth and zoning to ensure adequate provision of utility services into the future. Similar to under the Typical Projects, growth that could result in increased demand for utilities has been accounted for in the various resource management plans of the service providers and municipalities along the LA River. However, there could be potentially significant impacts with regard to sufficient supply/capacity for one or more utilities for operation of KOP Categories 1 through 5. For KOP Category 6, a housing or wastewater treatment facility project would demand greater amounts of water, electricity, and natural gas. These design components would be evaluated on a subsequent-project-specific and location-specific basis to determine the level of impact, if any, on utilities. Because the extent of these projects is unknown, there could be localized insufficiencies of utility services that could require expansion of existing infrastructure or construction of new infrastructure and an environmental impact could occur. Despite implementation of Mitigation Measure UTIL-1, there could be localized utility insufficiencies that remain. Operation impacts could be significant and unavoidable for the KOP categories.

This conclusion of significant and unavoidable impacts for the operation phase also applies to the overall *2020 LA River Master Plan*.

4.1.11.2 Water Supply (Impact 3.18(b))

Construction

None.

Operation

Preparation of a utilities plan during the design phase would identify potential insufficiencies in water supply versus demand. Growth that could result in increased demand for water has been accounted for in the various resource management plans of the service providers and municipalities along the LA River. Senate Bill 610 requires that water supply assessments occur early in the land use planning process for all large-scale development projects. Nevertheless, because of the larger extent of KOP Category 6 design components, potentially significant impacts with regard to sufficient water supply for the operations period could occur. Given the specific location, size, and extent of subsequent design components under KOP Category 6 are unknown, the associated water demand could result in significant and unavoidable impacts even with implementation of Mitigation Measure UTIL-4.

This conclusion of significant and unavoidable impacts also applies to both the construction and operation phases of the overall *2020 LA River Master Plan*.

4.1.11.3 Wastewater Treatment (Impact 3.18(c))

Construction

None.

Operation

KOP Category 6 could result in a wide variety of projects, many of which would generate wastewater during the operations period. It should be noted that one of the potential KOP Category 6 elements is a water treatment facility, which would not generate substantial amounts of its own wastewater and would result in an increase in wastewater treatment capacity, a beneficial impact. Because the location, size, and extent of these projects are unknown, it cannot be quantified how much wastewater would be generated by an individual design component under KOP Category 6. Wastewater generation could exceed the capacity of existing wastewater treatment facilities or local conveyance systems. Despite implementation of Mitigation Measure UTIL-4 during the design phase, there could be localized wastewater conveyance or treatment deficiencies that remain. Impacts could be significant and unavoidable.

This conclusion of significant and unavoidable impacts also applies to both the construction and operation phases of the overall *2020 LA River Master Plan*.

4.1.12 Wildfire (Section 3.19)

4.1.12.1 Exposure of Occupants to Wildfire-Related Pollutants (Impact 3.19(b))

Construction

None.

Operation

Operation of the Typical Projects or KOP categories could introduce additional visitors and staff. If a newly constructed Typical Project or KOP Category 1 through 6 design component is within or adjacent to a Very High Fire Hazard Severity Zone, it could expose additional visitors, staff, and structures to hazardous conditions associated with the high risk of wildfire at the site who were not previously exposed to this risk. Furthermore, the addition of more people and structures to an area that is designated as a Very High Fire Hazard Severity Zone could exacerbate existing wildfire risks.

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. Therefore, operational impacts for the six KOP categories and Typical Projects could be significant and unavoidable.

This conclusion of significant and unavoidable impacts for operations also applies to the overall *2020 LA River Master Plan*.

4.1.12.2 Exacerbation of Wildfire Risk (Impact 3.19(c))

Construction

None.

Operation

Operation of the Typical Projects or KOP categories within or adjacent to Very High Fire Hazard Severity Zones will require the implementation of certain measures to protect defensible space surrounding the property, such as routine vegetation clearing or additional sprinkler systems. These measures would be intended to reduce the potential risk of fire ignition and spread. While protective measures such as brush management are intended to reduce wildfire risk, the ongoing removal of vegetation could result in other impacts on the environment. Therefore, because the locations of the Typical Projects and KOP categories are unknown, and the types of fire breaks or utilities that may be required at these locations are unknown, there is the potential that operation and maintenance of fire breaks, utilities, or other infrastructure could pose temporary or permanent environmental impacts.

Mitigation Measure WF-3 requires the County or local jurisdiction implementing the *2020 LA River Master Plan* to prepare an FPP to mitigate the risk of wildfire impacts related to flammable vegetation. However, the locations of future project sites 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. Therefore, operational impacts from the Typical Projects and six KOP categories could be significant and unavoidable.

This conclusion of significant and unavoidable impacts for operations also applies to the overall *2020 LA River Master Plan*.

4.2 Impacts Found to Be Less than Significant with Mitigation for Later Activities Carried Out by the County and Significant Unavoidable When Not Carried Out by the County

Impacts on the following resource areas would be less than significant with mitigation for later activities when carried out by the County. However, because some later activities under the *2020 LA River Master Plan* would not be carried out by the County, the County cannot enforce or guarantee that the mitigation measures would be incorporated. Therefore, the impact would be significant and unavoidable when these activities are not carried out by the County.

- Aesthetics (Section 3.1)
    - Scenic Vista
        - Common Elements Typical Project (Construction)
        - Multi-Use Trails and Access Gateways Typical Project (Construction)
        - KOP Categories 1 through 6 (Construction)
        - Overall *2020 LA River Master Plan* Implementation (Construction)
    - Visual Character
        - Common Elements Typical Project (Construction)
        - Multi-Use Trails and Access Gateways Typical Project (Construction)
        - KOP Categories 1 through 6 (Construction)
        - Overall *2020 LA River Master Plan* Implementation (Construction)
    - Light and Glare
        - Common Elements Typical Project (Operations)
        - Multi-Use Trails and Access Gateways Typical Project (Operations)
        - KOP Categories 1 through 6 (Operations)
        - Overall *2020 LA River Master Plan* Implementation (Operations)
- Air Quality (Section 3.2)
    - Objectionable Odors
        - KOP Category 1 (Operations)
        - Overall *2020 LA River Master Plan* Implementation (Operations)
- Biological Resources (Section 3.3)
    - Species
        - Common Elements Typical Project (Construction and Operations)
        - Multi-Use Trails and Access Gateways Typical Project (Construction and Operations)

        - KOP Categories 1 through 6 (Construction and Operations)
        - Overall *2020 LA River Master Plan* Implementation (Construction and Operations)
    - Sensitive Natural Community
        - Common Elements Typical Project (Construction and Operations)
        - Multi-Use Trails and Access Gateways Typical Project (Construction and Operations)
        - KOP Categories 1 through 3 (Construction and Operations)
        - Overall *2020 LA River Master Plan* Implementation (Construction and Operations)
    - Wetlands
        - Common Elements Typical Project (Construction and Operations)
        - Multi-Use Trails and Access Gateways Typical Project (Construction and Operations)
        - KOP Categories 1 through 2 (Construction and Operations)
        - Overall *2020 LA River Master Plan* Implementation (Construction and Operations)
    - Wildlife Corridors or Wildlife Nursery Sites
        - Common Elements Typical Project (Construction and Operations)
        - Multi-Use Trails and Access Gateways Typical Project (Construction and Operations)
        - KOP Categories 1 through 3, KOP Categories 5 and 6 (Construction and Operations)
        - Overall *2020 LA River Master Plan* Implementation (Construction and Operations)
    - Local Policies or Ordinances
        - Common Elements Typical Project (Construction and Operations)
        - Multi-Use Trails and Access Gateways Typical Project (Construction and Operations)
        - KOP Category 1 (Construction and Operations)
        - Overall *2020 LA River Master Plan* Implementation (Construction and Operations)
- Geology, Soils, and Paleontological Resources (Section 3.6)
    - Earthquake Fault Rupture, Seismic Shaking, Ground Failure, or Landslides
        - Common Elements Typical Project (Construction and Operations)
        - Multi-Use Trails and Access Gateways Typical Project (Construction and Operations)
        - KOP Categories 1 through 6 (Construction and Operations)
        - Overall *2020 LA River Master Plan* Implementation (Construction and Operations)
    - On- or Off-Site Landslide, Lateral Spreading, Subsidence, Liquefaction or Collapse
        - Common Elements Typical Project (Construction and Operations)
        - Multi-Use Trails and Access Gateways Typical Project (Construction and Operations)
        - KOP Categories 1 through 6 (Construction)

        - Overall *2020 LA River Master Plan* Implementation (Construction and Operations)
    - Expansive Soil
        - Common Elements Typical Project (Construction and Operations)
        - Multi-Use Trails and Access Gateways Typical Project (Construction and Operations)
        - KOP Categories 1 through 6 (Construction)
        - Overall *2020 LA River Master Plan* Implementation (Construction and Operations)
    - Paleontological Resources
        - Common Elements Typical Project (Construction and Operations)
        - Multi-Use Trails and Access Gateways Typical Project (Construction and Operations)
        - KOP Categories 1 through 6 (Construction and Operations)
        - Overall *2020 LA River Master Plan* Implementation (Construction and Operations)
- Greenhouse Gas Emissions (Section 3.7)
    - Policies (Construction and Operations)
        - Common Elements Typical Project (Construction and Operations)
        - Multi-Use Trails and Access Gateways Typical Project (Construction and Operations)
- Hazards and Hazardous Materials (Section 3.8)
    - Upset and Accident Conditions
        - Common Elements Typical Project (Construction)
        - Multi-Use Trails and Access Gateways Typical Project (Construction)
        - KOP Categories 1 through 6 (Construction)
        - Overall *2020 LA River Master Plan* Implementation (Construction and Operations)
    - Hazards to Schools
        - Common Elements Typical Project (Construction)
        - Multi-Use Trails and Access Gateways Typical Project (Construction)
        - KOP Categories 1 through 6 (Construction)
        - Overall *2020 LA River Master Plan* Implementation (Construction and Operations)
    - Hazardous Materials Sites
        - Common Elements Typical Project (Construction)
        - Multi-Use Trails and Access Gateways Typical Project (Construction)
        - KOP Categories 1 through 6 (Construction)
        - Overall *2020 LA River Master Plan* Implementation (Construction and Operations)

    - Wildland Fire
        - Common Elements Typical Project (Construction and Operations)
        - Multi-Use Trails and Access Gateways Typical Project (Construction and Operations)
        - KOP Categories 1 through 6 (Construction and Operations)
        - Overall *2020 LA River Master Plan* Implementation (Construction and Operations)
- Hydrology and Water Quality (Section 3.9)
    - Drainage Alteration Resulting in Erosion, Flooding, Runoff, or Altered Flood Flows
        - Common Elements Typical Project (Construction and Operations)
        - Multi-Use Trails and Access Gateways Typical Project (Construction and Operations)
        - KOP Categories 1 through 6 (Construction)
        - KOP Categories 1 through 6 (Operations)
        - Overall *2020 LA River Master Plan* Implementation (Construction and Operations)
- Land Use and Planning (Section 3.10)
    - Divide Established Community
        - KOP Category 6 (Operations)
        - Overall *2020 LA River Master Plan* Implementation (KOP 6 - Construction and Operations)
- Noise (Section 3.12)
    - Temporary or Permanent Increase in Ambient Noise Levels in Excess of Standards
        - Common Elements Typical Project (Construction and Operations)
        - Multi-Use Trails and Access Gateways Typical Project (Construction)
        - KOP Categories 1 through 5 (Construction and Operations)
    - Groundborne Vibration or Groundborne Noise Levels
        - Common Elements Typical Project (Construction)
        - Multi-Use Trails and Access Gateways Typical Project (Construction)
        - KOP Categories 1 through 5 (Construction)
- Public Services (Section 3.14)
    - Police and Fire Services, Schools, Parks
        - KOP Categories 1 through 6 (Construction)
- Recreation (Section 3.15)
    - Increased Use of Existing Parks
        - Common Elements Typical Project (Construction)
        - Multi-Use Trails and Access Gateways Typical Project (Construction)

        - KOP Categories 1 through 6 (Construction)
        - Overall *2020 LA River Master Plan* Implementation (Construction)
    - Require Construction of Recreational Facilities
        - Common Elements Typical Project (Construction and Operations)
        - Multi-Use Trails and Access Gateways Typical Project (Construction and Operations)
        - KOP Categories 1 through 6 (Construction and Operations)
        - Overall *2020 LA River Master Plan* Implementation (Construction and Operations)
- Transportation (Section 3.16)
    - Conflict with Circulation System Program, Plan, Ordinance, or Policy
        - Common Elements Typical Project (Construction)
        - Multi-Use Trails and Access Gateways Typical Project (Construction)
        - KOP Categories 1 through 6 (Construction)
        - Overall *2020 LA River Master Plan* Implementation (Construction)
    - CEQA Guidelines Section 15064.3 subdivision (b)
        - Common Elements Typical Project (Construction)
        - Multi-Use Trails and Access Gateways Typical Project (Construction)
        - KOP Categories 1 through 6 (Construction)
        - Overall *2020 LA River Master Plan* Implementation (Construction)
    - Increase Hazards due to Geometric Design Feature or Result in Inadequate Emergency Access
        - Common Elements Typical Project (Construction)
        - Multi-Use Trails and Access Gateways Typical Project (Construction)
        - KOP Categories 1 through 6 (Construction)
        - Overall *2020 LA River Master Plan* Implementation (Construction)
- Utilities/Service Systems (Section 3.18)
    - Generation of Waste
        - KOP Category 6 (Construction and Operations)
        - Overall *2020 LA River Master Plan* Implementation (Construction and Operations)
- Wildfire (Section 3.19)
    - Emergency Response Plan
        - Common Elements Typical Project (Construction)
        - Multi-Use Trails and Access Gateways Typical Project (Construction)
        - KOP Categories 1 through 6 (Construction)

- Overall *2020 LA River Master Plan* Implementation (Construction and Operations)

- Exposure of Occupants to Wildfire-Related Pollutants
  - Common Elements Typical Project (Construction)
  - Multi-Use Trails and Access Gateways Typical Project (Construction)
  - KOP Categories 1 through 6 (Construction)
  - Overall *2020 LA River Master Plan* Implementation (Construction and Operations)
- Exacerbation of Wildfire Risk
  - Common Elements Typical Project (Construction)
  - Multi-Use Trails and Access Gateways Typical Project (Construction)
  - KOP Categories 1 through 6 (Construction)
  - Overall *2020 LA River Master Plan* Implementation (Construction)
- Expose People or Structures to Significant Post-Fire Risks
  - Common Elements Typical Project (Construction and Operations)
  - Multi-Use Trails and Access Gateways Typical Project (Construction and Operations)
  - KOP Categories 1 through 6 (Construction and Operations)
  - Overall *2020 LA River Master Plan* Implementation (Construction and Operations)

4.3 Impacts Found to Be Less than Significant

The environmental analyses presented in Chapter 3, *CEQA Environmental Impact Assessment*, are summarized below (pursuant to CEQA Section 15128) and broken down by no impacts and impacts found to be less than significant.

4.3.1 No Impacts

Chapter 3 concluded that the proposed Project would result in no impacts in both County and non-County jurisdictions in the following areas:

- Biological Resources (Section 3.3)
  - Conservation Plan
    - Common Elements Typical Project (Construction and Operations)
    - Multi-Use Trails and Access Gateways Typical Project (Construction and Operations)
    - KOP Categories 1 through 6 (Construction and Operations)
    - Overall *2020 LA River Master Plan* Implementation (Construction and Operations)
- Geology, Soils, and Paleontological Resources (Section 3.6)
  - Use of Septic Tanks or Alternative Waste Disposal Systems

        - Common Elements Typical Project (Construction and Operations)
        - Multi-Use Trails and Access Gateways Typical Project (Construction and Operations)
        - KOP Categories 1 through 6 (Construction and Operations)
        - Overall *2020 LA River Master Plan* Implementation (Construction and Operations)
- Hazards and Hazardous Materials (Section 3.8)
    - Safety Hazard or Excessive Noise within or near Airport
        - Common Elements Typical Project (Construction and Operations)
        - Multi-Use Trails and Access Gateways Typical Project (Construction and Operations)
        - KOP Categories 1 through 6 (Construction and Operations)
        - Overall *2020 LA River Master Plan* Implementation (Construction and Operations)
- Hydrology and Water Quality (Section 3.9)
    - Water Quality Standards
        - KOP Category 4 (Operations)
    - Groundwater Management Plan
        - Common Elements Typical Project (Construction and Operations)
        - Multi-Use Trails and Access Gateways Typical Project (Construction and Operations)
        - KOP Categories 1 through 6 (Construction and Operations)
        - Overall *2020 LA River Master Plan* Implementation (Construction and Operations)
- Land Use (Section 3.10)
    - Divide Established Community
        - KOP Categories 1 through 3 (Operations)
        - Overall *2020 LA River Master Plan* Implementation (KOP Categories 1 through 5 - Construction and Operations)
- Utilities/Service Systems (Section 3.18)
    - Water Supplies
        - KOP Category 4 (Operations)
    - Adequate Capacity for Wastewater Treatment Provider
        - Common Elements Typical Project (Construction)
        - Multi-Use Trails and Access Gateways Typical Project (Construction)

4.3.2 Impacts Found to Be Less than Significant

The analyses presented in Chapter 3, *CEQA Environmental Impact Assessment*, concluded that the proposed Project would result in less-than-significant impacts in the following resource areas in both County and non-County jurisdiction, and, therefore, no mitigation measures are required.

- Aesthetics (Section 3.1)
  - Scenic Vista
    - Common Elements Typical Project (Operations)
    - Multi-Use Trails and Access Gateways Typical Project (Operations)
    - KOP Categories 1 through 5 (Operations)
  - Scenic Resources
    - Common Elements Typical Project (Construction and Operations)
    - Multi-Use Trails and Access Gateways Typical Project (Construction and Operations)
    - KOP Categories 1 through 6 (Construction and Operations)
    - Overall *2020 LA River Master Plan* Implementation (Construction and Operations)
  - Visual Character
    - Common Elements Typical Project (Operations)
    - Multi-Use Trails and Access Gateways Typical Project (Operations)
    - KOP Categories 1 through 6 (Operations)
    - Overall *2020 LA River Master Plan* Implementation (Operations)
  - Light and Glare
    - Common Elements Typical Project (Construction)
    - Multi-Use Trails and Access Gateways Typical Project (Construction)
    - KOP Categories 1 through 6 (Construction)
    - Overall *2020 LA River Master Plan* Implementation (Construction)
- Air Quality (Section 3.2)
  - Obstruct Implementation of the Applicable Air Quality Plan
    - Common Elements Typical Project (Construction and Operations)
    - Multi-Use Trails and Access Gateways Typical Project (Construction and Operations)
    - KOP Categories 1 through 6 (Construction and Operations)
    - Overall *2020 LA River Master Plan* Implementation (Construction and Operations)
  - Violate Air Quality Standard
    - Common Elements Typical Project (Construction and Operations)
    - Multi-Use Trails and Access Gateways Typical Project (Construction and Operations)
  - Objectionable Odors
    - Common Elements Typical Project (Construction and Operations)
    - Multi-Use Trails and Access Gateways Typical Project (Construction and Operations)

        - KOP Category 1 (Construction)
        - KOP Categories 2 through 6 (Construction and Operations)
        - Overall *2020 LA River Master Plan* Implementation (Construction)
- Energy (Section 3.5)
    - Consumption of Energy
        - Common Elements Typical Project (Construction and Operations)
        - Multi-Use Trails and Access Gateways Typical Project (Construction and Operations)
        - KOP Categories 1 through 6 (Construction and Operations)
        - Overall *2020 LA River Master Plan* Implementation (Construction and Operations)
    - State or Local Plans
        - Common Elements Typical Project (Construction and Operations)
        - Multi-Use Trails and Access Gateways Typical Project (Construction and Operations)
        - KOP Categories 1 through 6 (Construction and Operations)
        - Overall *2020 LA River Master Plan* Implementation (Construction and Operations)
- Geology, Soils, and Paleontological Resources (Section 3.6)
    - Soil Erosion or Loss of Top Soil
        - Common Elements Typical Project (Construction and Operations)
        - Multi-Use Trails and Access Gateways Typical Project (Construction and Operations)
        - KOP Categories 1 through 6 (Construction and Operations)
        - Overall *2020 LA River Master Plan* Implementation (Construction and Operations)
    - On- or Off-Site Landslide, Lateral Spreading, Subsidence, Liquefaction or Collapse
        - KOP Categories 1 through 6 (Operations)
    - Expansive Soil
        - KOP Categories 1 through 6 (Operations)
- Hazards and Hazardous Materials (Section 3.8)
    - Routine Transport
        - Common Elements Typical Project (Construction and Operations)
        - Multi-Use Trails and Access Gateways Typical Project (Construction and Operations)
        - KOP Categories 1 through 6 (Construction and Operations)
        - Overall *2020 LA River Master Plan* Implementation (Construction and Operations)
    - Upset and Accident Conditions
        - Common Elements Typical Project (Operations)

        - Multi-Use Trails and Access Gateways Typical Project (Operations)
        - KOP Categories 1 through 6 (Operations)
    - Hazards to Schools
        - Common Elements Typical Project (Operations)
        - Multi-Use Trails and Access Gateways Typical Project (Operations)
        - KOP Categories 1 through 6 (Operations)
    - Hazardous Materials Sites
        - Common Elements Typical Project (Operations)
        - Multi-Use Trails and Access Gateways Typical Project (Operations)
        - KOP Categories 1 through 6 (Operations)
    - Emergency Response
        - Common Elements Typical Project (Construction and Operations)
        - Multi-Use Trails and Access Gateways Typical Project (Construction and Operations)
        - KOP Categories 1 through 6 (Construction and Operations)
        - Overall *2020 LA River Master Plan* Implementation (Construction and Operations)
- Hydrology and Water Quality (Section 3.9)
    - Water Quality Standards
        - Common Elements Typical Project (Construction and Operations)
        - Multi-Use Trails and Access Gateways Typical Project (Construction and Operations)
        - KOP Categories 1, 2, 3, 5, and 6 (Construction and Operations)
        - Overall *2020 LA River Master Plan* Implementation (Construction and Operations)
    - Groundwater Supplies
        - Common Elements Typical Project (Construction and Operations)
        - Multi-Use Trails and Access Gateways Typical Project (Construction and Operations)
        - KOP Categories 1 through 6 (Construction)
        - KOP Categories 1 through 6 (Operations)
        - Overall *2020 LA River Master Plan* Implementation (Construction and Operations)
    - Drainage Alteration Resulting in Erosion, Flooding, Runoff, or Altered Flood Flows
        - Common Elements Typical Project (Construction)
    - Inundation
        - Common Elements Typical Project (Construction and Operations)
        - Multi-Use Trails and Access Gateways Typical Project (Construction and Operations)

        - KOP Categories 1 through 6 (Construction and Operations)
        - Overall *2020 LA River Master Plan* Implementation (Construction and Operations)
- Land Use and Planning (Section 3.10)
    - Divide Established Community
        - Common Elements Typical Project (Construction)
        - Multi-Use Trails and Access Gateways Typical Project (Construction)
        - KOP Categories 1 through 5 (Construction)
        - KOP Categories 4 and 5 (Operations)
    - Conflict with Applicable Plans and Policies
        - Common Elements Typical Project (Construction and Operations)
        - Multi-Use Trails and Access Gateways Typical Project (Construction and Operations)
        - KOP Categories 1 and 2 (Construction)
        - KOP Categories 3, 4, and 5 (Construction and Operations)
- Mineral Resources (Section 3.11)
    - Locally Important Mineral Resource
        - Common Elements Typical Project (Construction and Operations)
        - Multi-Use Trails and Access Gateways Typical Project (Construction and Operations)
        - KOP Categories 1 through 6 (Construction and Operations)
        - Overall *2020 LA River Master Plan* Implementation (Construction and Operations)
- Noise (Section 3.12)
    - Temporary or Permanent Increase in Ambient Noise Levels in Excess of Standards
        - Multi-Use Trails and Access Gateways Typical Project (Operations)
    - Groundborne Vibration or Groundborne Noise Levels
        - Common Elements Typical Project (Operations)
        - Multi-Use Trails and Access Gateways Typical Project (Operations)
        - KOP Categories 1 through 6 (Operations)
    - Airstrip
        - Common Elements Typical Project (Construction and Operations)
        - Multi-Use Trails and Access Gateways Typical Project (Construction and Operations)
        - KOP Categories 1 through 6 (Construction and Operations)
        - Overall *2020 LA River Master Plan* Implementation (Construction and Operations)
- Population and Housing (Section 3.13)

- Population Growth
  - Common Elements Typical Project (Construction and Operations)
  - Multi-Use Trails and Access Gateways Typical Project (Construction and Operations)
  - KOP Categories 1 through 6 (Construction and Operations)
  - Overall *2020 LA River Master Plan* Implementation (Construction and Operations)
- Displace Substantial Numbers of Existing Housing Units
  - Common Elements Typical Project (Construction and Operations)
  - Multi-Use Trails and Access Gateways Typical Project (Construction and Operations)
  - KOP Categories 1 through 6 (Construction and Operations)
  - Overall *2020 LA River Master Plan* Implementation (Construction and Operations)

- Public Services (Section 3.14)
  - Police and Fire Services, Schools, Parks
    - Common Elements Typical Project (Construction and Operations)
    - Multi-Use Trails and Access Gateways Typical Project (Construction and Operations)
- Recreation (Section 3.15)
  - Increased Use of Existing Parks
    - Common Elements Typical Project (Operations)
    - Multi-Use Trails and Access Gateways Typical Project (Operations)
    - KOP Categories 1 through 6 (Operations)
    - Overall *2020 LA River Master Plan* Implementation (Operations)
  - Require Construction of Recreational Facilities
    - Common Elements Typical Project (Construction and Operations)
    - Multi-Use Trails and Access Gateways Typical Project (Construction and Operations)
    - KOP Categories 1 through 6 (Construction and Operations)
    - Overall *2020 LA River Master Plan* Implementation (Construction and Operations)
- Transportation (Section 3.16)
  - Conflict with Circulation System Program, Plan, Ordinance, or Policy
    - Common Elements Typical Project (Operations)
    - Multi-Use Trails and Access Gateways Typical Project (Operations)
    - KOP Categories 1 through 6 (Operations)
    - Overall *2020 LA River Master Plan* Implementation (Operations)
  - CEQA Guidelines Section 15064.3 subdivision (b)

        - Multi-Use Trails and Access Gateways Typical Project (Operations)
    - Increase Hazards due to Geometric Design Feature or Result in Inadequate Emergency Access
        - Common Elements Typical Project (Operations)
        - Multi-Use Trails and Access Gateways Typical Project (Operations)
        - KOP Categories 1 through 6 (Operations)
        - Overall *2020 LA River Master Plan* Implementation (Operations)
- Utilities/Service Systems (Section 3.18)
    - Exceed Water or Wastewater Treatment Stormwater Drainage, Electric Power, Natural Gas, or Telecommunications Facilities
        - Common Elements Typical Project (Construction and Operations)
        - Multi-Use Trails and Access Gateways Typical Project (Construction and Operations)
        - KOP Categories 1–6 (Construction)
        - Overall *2020 LA River Master Plan* Implementation (Construction)
    - Water Supplies
        - Common Elements Typical Project (Construction and Operations)
        - Multi-Use Trails and Access Gateways Typical Project (Construction and Operations)
        - KOP Categories 1 through 3 (Construction and Operations)
        - KOP Categories 4 through 6 (Construction)
        - KOP Category 5 (Operations)
    - Adequate Capacity for Wastewater Treatment Provider
        - Common Elements Typical Project (Operations)
        - Multi-Use Trails and Access Gateways Typical Project (Operations)
        - KOP Categories 1 through 6 (Construction)
        - KOP Categories 1 through 5 (Operations)
    - Generation of Waste
        - Common Elements Typical Project (Construction and Operations)
        - Multi-Use Trails and Access Gateways Typical Project (Construction and Operations)
        - KOP Categories 1 through 5 (Construction and Operations)
    - Compliance with Solid Waste Regulations
        - Common Elements Typical Project (Construction and Operations)
        - Multi-Use Trails and Access Gateways Typical Project (Construction and Operations)
        - KOP Categories 1 through 6 (Construction and Operations)

    - Overall *2020 LA River Master Plan* Implementation (Construction and Operations)
- Wildfire (Section 3.19)
    - Emergency Response Plan
        - Common Elements Typical Project (Operations)
        - Multi-Use Trails and Access Gateways Typical Project (Operations)
        - KOP Categories 1 through 6 (Operations)

4.4 Growth-Inducement and Indirect Impacts

According to Section 15126.2 (e) of the State CEQA Guidelines, growth-inducing impacts of the proposed Project shall be discussed in the PEIR. Growth-inducing impacts are those effects of the proposed Project that might foster economic or population growth or the construction of new housing, either directly or indirectly, in the surrounding environment. According to CEQA, increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects.

Induced growth is any growth that exceeds planned growth and results from new development that would not have taken place without implementation of the proposed Project. Typically, the growth-inducing potential of a project would be considered significant if it results in growth or population concentration that exceeds those assumptions included in pertinent master plans, land use plans, or projections made by regional planning authorities. However, the creation of growth-inducing potential does not automatically lead to growth, whether it would be below or in exceedance of the projected level. Under CEQA, it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

The *2020 LA River Master Plan* builds on the adopted *1996 LA River Master Plan* and other regional planning studies. As described in Section 3.13, *Population and Housing,* the temporary and specialized nature of construction work, as well as the large available construction workforce in the Los Angeles region, would not lead to a substantial population increase during the construction period. With respect to the operations period, Section 3.13 states that the *2020 LA River Master Plan* includes goals and objectives of providing clean water, native habitat, parks, recreation, multiuse trails, art, and cultural resources to improve human and ecosystem health, equity, access, mobility, and economic opportunity for the diverse communities of the County, while providing flood risk management. Many of the approximately 107 projects proposed under the *2020 LA River Master Plan* are intended to provide flood management, recreational uses, and ecological uses. Projects are intended to serve the local community and not intended to substantially increase population growth.

One of the nine objectives of the *2020 LA River Master Plan* (Objective No. 6) is addressing potential adverse impacts on housing affordability and people experiencing homelessness. About a third (32 percent) of renters in the County are severely rent-burdened, meaning they spend more than half of their income on rent. As the affordable housing shortfall has risen, so has the number of people experiencing homelessness, which exceeded 50,000 people across the County. Of particular relevance to the Project is the estimate of approximately 8,800 persons experiencing homelessness living in neighborhoods adjacent to the river. Objective No. 6 of the Project recognizes that the goal

of increasing parks and open space may simultaneously have the potential to negatively affect housing affordability. The *2020 LA River Master Plan* seeks to improve neighborhoods without causing negative effects of displacement by proactively implementing a strategy for preventing displacement and supporting continuing affordability of housing in river-adjacent communities.

As concluded in Section 3.13, inclusion of affordable housing in the *2020 LA River Master Plan* would not induce population but would rather serve the existing underserved low-income population and facilitate development of supportive housing for people experiencing homelessness. Therefore, the Typical Projects and KOP Categories 1 through 6, even when considered together, would not induce substantial unplanned population growth in the project study area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure). Consequently, the proposed Project is not expected to result in significant growth-inducing impacts on the environment.

4.5 Irreversible Environmental Changes

State CEQA Guidelines Section 15126.2(d) requires a discussion of any significant irreversible environmental changes that would be caused by the proposed Project, and states:

> Uses of nonrenewable resources during the initial and continued phases of the Project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts, and particularly, secondary impacts (such as a highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the Project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

Implementation of the proposed Project would occur along the 51 miles of the LA River and through 17 local jurisdictions and unincorporated County areas. Proposed development would include the irreversible commitment of natural resources (water and raw materials required during construction and operations), energy, land, and human resources. Ongoing maintenance and operation of the flood management infrastructure as well as new retail amenities, natural resource areas, trails, art, parks, and cultural resources would entail a further irreversible commitment of energy resources in the form of petroleum products (diesel fuel and gasoline), natural gas, and electricity generated by burning fossil fuels. Long-term impacts would also result from an increase in vehicular traffic and the associated air pollutant and noise emissions.