

December 2024 | EIR Addendum
State Clearinghouse No. 2022020128

NORWALK ENTERTAINMENT DISTRICT-CIVIC CENTER SPECIFIC PLAN PROJECT

For City of Norwalk

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1. Introduction and Background

This document is an Addendum to the City of Norwalk’s previously approved Norwalk Entertainment District-Civic Center Specific Plan Project Environmental Impact Report (EIR) (State Clearinghouse No. 2022020128) which analyzed the establishment, implementation, and buildout of a Specific Plan that would allow for a mixed-use development of residential and commercial uses, open space, and parking. The Specific Plan would allow for the development of a new mixed-use development with up to 350 multifamily residential units, up to 110,000 square feet of commercial uses, 100,000 square feet of publicly accessible open space, and 1,701 parking spaces (inclusive of the existing parking structure). The approved project also allows the construction of two additional levels of parking (700 spaces) at the existing parking structure.

On October 4, 2022 and October 18, 2022 the City of Norwalk certified the EIR (certified EIR) and adopted the Norwalk Entertainment District – Civic Center Specific Plan (“Specific Plan”), respectively. This Addendum to the certified EIR has been prepared in accordance with Sections 15162 and 15164 of the California Environmental Quality Act (CEQA) Guidelines. Since the approval of the Specific Plan and certification of its EIR, the project applicant (Primestor) sought to implement the Specific Plan and designed a project that utilizes the State Density Bonus Law (Government Code Section 65915). The development being proposed under the Specific Plan and State Density Bonus Law includes 374 multifamily residential units, 94,398 square feet of commercial uses, 119,643 square feet of publicly accessible open space, 1,542 parking spaces, and other design standards/elements (proposed project). Refer to Section 3, *Proposed Project*, for a full description of the proposed project. While the proposed project does not propose any amendments or other changes to the Specific Plan, some elements of the proposed project differ from those assumed in the certified EIR’s analysis. The establishment, implementation, and buildout of the Specific Plan as studied in the certified EIR is referred to as the “approved project.”

The City of Norwalk, as the lead agency under CEQA, has prepared this Addendum to the certified EIR to consider environmental impacts associated with the proposed project as compared to the approved project studied in the certified EIR. Furthermore, the proposed project would comply with all applicable mitigation measures, similar to the approved project.

1.1 BASIS FOR CEQA ADDENDUM

According to CEQA Guidelines, Section 15164(a), an addendum shall be prepared if some changes or additions to a previously certified EIR are necessary, but none of the conditions enumerated in CEQA Guidelines Sections 15162(a)(1) to (3) calling for the preparation of a subsequent EIR have occurred. As stated in CEQA Guidelines Section 15162 (Subsequent EIRs and Negative Declarations):

When an EIR has been certified or negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

1. Introduction and Background

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or negative declaration was adopted, shows any of the following:
 - (a) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - (b) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - (c) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - (d) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Although the proposed project would result in physical changes as compared to the approved project, the proposed project would not result in any of the conditions outlined in CEQA Guidelines Sections 15162(a)(1) to (3) because the proposed changes would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects requiring major revisions to the certified EIR, and there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the EIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3). Accordingly, this Addendum provides the substantial evidence required by CEQA Guidelines Section 15164(e) to support the finding that a subsequent EIR is not required and that an addendum to the certified EIR is the appropriate environmental document to evaluate changes associated with the proposed project.

As stated in CEQA Guidelines Section 15164 (Addendum to an EIR):

- (a) The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.
- (b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.

1. Introduction and Background

- (c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.
- (d) The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.
- (e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

1.2 SCOPE OF ANALYSIS FOR THIS ADDENDUM

In accordance with the CEQA Guidelines, the City has determined that an Addendum to the certified EIR is the appropriate environmental clearance for the proposed project. This Addendum reviews the changes proposed by the proposed project and considers whether there is any new information of substantial importance that was not known and could not have been known with exercise of reasonable diligence at the time that the EIR was certified. It further examines whether, as a result of any changes or any new information, a subsequent EIR may be required. This examination includes an analysis of the provisions of California Public Resources Code Section 21166 and Section 15162 of the CEQA Guidelines and their applicability to the proposed project.

As lead agency under CEQA, the City of Norwalk is required to evaluate the environmental impacts associated with proposed project. The scope of the review for project-related impacts for this Addendum is focused on the differences between impacts analyzed by the certified EIR for implementation of the approved project and the proposed project. The approved project will serve as the “baseline” for evaluating the impacts of the proposed project and is therefore used as the “baseline” for the environmental impact analysis. The baseline includes all applicable mitigation measures from the certified EIR. As required by CEQA, this Addendum also addresses changes in circumstances or new information that would potentially involve new environmental impacts.

1.3 PREVIOUS ENVIRONMENTAL DOCUMENTATION

This Addendum relies on the environmental analysis in the City of Norwalk's previously approved Norwalk Entertainment District-Center Center Specific Plan Project EIR (State Clearinghouse No. 2022020128). The original EIR was circulated for public review from July 1, 2022 through August 15, 2022. A Final EIR was prepared, and the proposed project and FEIR were approved and certified on October 4, 2022. On October 18, 2022, the City of Norwalk adopted the Zone Text Amendment establishing the Norwalk Entertainment District – Civic Center Specific Plan and the development agreement between the City of Norwalk and Primestor Development, Inc. This environmental document is available on the City of Norwalk website. In accordance with CEQA Guidelines Sections 15148 and 15150, this Addendum incorporates the certified EIR (and its constituent parts including the adopted Mitigation Monitoring Reporting Program (MMRP)) by reference.

1. Introduction and Background

The certified EIR analyzed the establishment of a Specific Plan that would allow for a mixed-use development of residential and commercial uses, open space, and parking (i.e. approved project). The certified EIR evaluated the implementation, including construction and operation, of the approved project. The certified EIR also included federal, state, and local policies and mitigation measures to ensure impacts are minimized to the extent feasible.

City adopted a MMRP, Findings, a Statement of Overriding Considerations, and conditions of approval. The certified EIR found that the approved project would result in less-than-significant impacts with no mitigation required for the following environmental topics:

- Aesthetics
- Energy
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Population and Housing
- Public Services
- Recreation
- Utilities and Service Systems

The certified EIR found that the approved project would result in a less-than-significant impact with the incorporation of mitigation measures for the following environmental topics:

- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Noise
- Transportation
- Tribal Cultural Resources

The certified EIR determined that implementation of the approved project would result in significant and unavoidable impacts to the following environmental topic:

Greenhouse Gas Emissions

- The approved project would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
- Cumulative greenhouse gas emissions, climate change, and energy conservation impact.

2. Approved Project

The approved project established the Norwalk Entertainment District-Civic Center (EDCC) Specific Plan (Specific Plan) that allows for a mixed-use development of residential and commercial uses, open space, and parking. The approved project would occur on the site of the existing City Hall, City Hall Lawn, surface parking lot, existing county parking structure, and the portion of the County accessory building (project site). The approved project did not include any changes to the existing Norwalk City Hall building and the portion of the County accessory building. The approved project allows for the development of a new mixed-use development with up to 350 multifamily residential units, up to 110,000 square feet of commercial uses, 100,000 square feet of publicly accessible open space, and 1,701 parking spaces (inclusive of the existing parking structure). The approved project also allows the construction of two additional levels of parking (700 spaces) at the existing parking structure. The commercial component includes a mix of retail, food and beverage, health and wellness, and/or grocery/market uses. The existing county parking structure on the south side of the project site would remain, and up to two additional levels could be added as needed to accommodate future parking demand within the civic center/entertainment district area. The approved project includes a conceptual site plan that would implement the development standards and regulations in the Specific Plan.

2.1 PROJECT LOCATION

The proposed project site is the same as the approved project site. The project site comprises approximately 13.2-acres located at the southeast corner of the intersection of Imperial Highway and Norwalk Boulevard in the City of Norwalk. The address for Norwalk City Hall is 12700 Norwalk Boulevard. The project site consists of three assessor parcels (Assessor's Parcel Numbers (APN) 8047-006-922, -924, and -925) owned by the City of Norwalk and a portion of one parcel (APN 8047-006-927) owned by the County of Los Angeles. At the time of the certified EIR, the project site was developed with the Norwalk City Hall, City Hall Lawn, a portion of the County accessory building, a surface parking lot, and a three-level parking structure. The project site also includes existing monuments, including the memorial on the corner of Norwalk Boulevard and Imperial Highway, the Freedom Memorial, the Manuel Salinas plaque, and the time capsule north of City Hall.

2.2 ENVIRONMENTAL SETTING

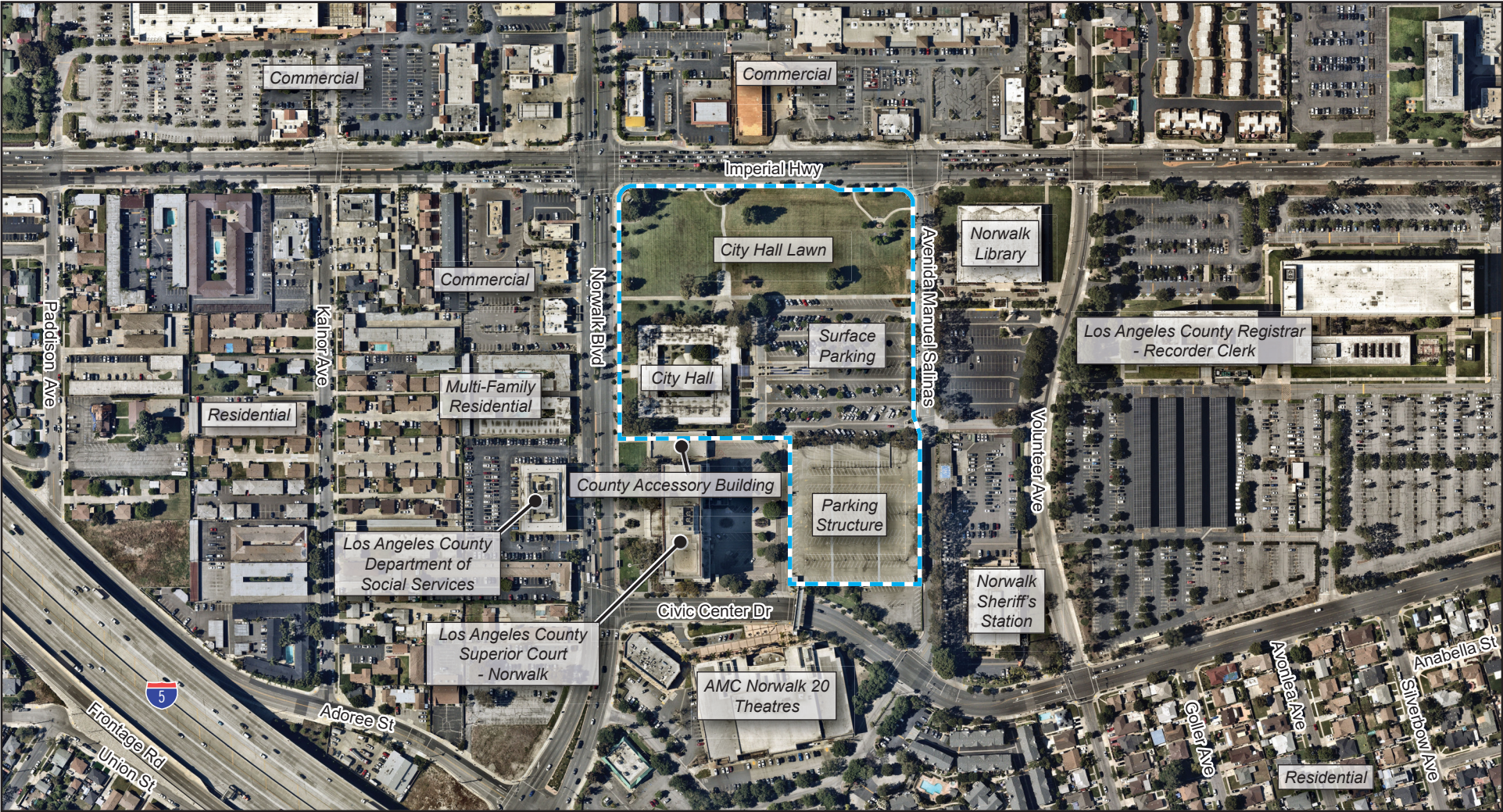
The project site, which includes Norwalk City Hall, City Hall Lawn, a portion of the County accessory building, a surface parking lot, and a three-level parking structure, and aforementioned monuments, have not changed since the certified EIR. The project site includes a monument sign and fountain on the northeast corner of the project site, near the intersection of Norwalk Boulevard and Imperial Highway, and two memorials—a tribute to Norwalk emergency professionals on the northeast side of the project site and the “Freedom Memorial,” in the surface parking lot near the entrance to City Hall. In addition, the project site has an underground time capsule just north of City Hall and a plaque to Manuel Salinas on the west side of the project site. The project site includes a total of 160 landscaped trees throughout the surface parking lot, landscaping around City Hall

2. Approved Project

and City Hall Lawn, and landscaping near the monument sign on the northwest corner of the project site. City Hall Lawn is mainly grass with dispersed mature trees and walking paths. Figure 1, *Aerial Photograph*, is an aerial photograph showing the site conditions and project site boundaries that have not changed.

The only change since the approval certification of the approved project and its EIR, is to the tiled steps leading to City Hall, which have been painted over with black paint. No other changes to the existing site conditions have occurred.

Figure 1 - Aerial Photograph



Project Boundary

0 360
Scale (Feet)



Source: Nearmap 2024.

2. Approved Project

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3. Proposed Project

3.1 PROPOSED PROJECT DESCRIPTION

The proposed project would implement the Specific Plan with some modifications to the approved project. The proposed project includes a mixed-use development with 374 dwelling units, comprised of 318 market-rate units and 56 affordable units (which includes one manager's unit), and 94,398 square feet of commercial uses. Similar to the approved project, the proposed project would include commercial and residential uses that would be primarily inward facing towards a central spine of open space, connecting uses on-site and facilitating connection to commercial and civic uses in the area. Consistent with the approved project, the existing County parking structure on the south side of the project site would remain. The Specific Plan allows for the addition of up to two additional parking levels as needed to accommodate future parking demand in the civic center/entertainment district area, which are not proposed at this time. Table 1, *Proposed Project Residential and Commercial Overview*, provides an overview of the proposed project's components. See Figure 2, *Site Plan*, which depicts the site plan for the proposed project. See Figure 3, *Aerial Rendering*, which shows an illustrative rendering of the proposed project.

Table 1 Proposed Project Residential and Commercial Overview

Land Use	Dwelling Unit (du) / Square Feet (sf)
Market-Rate Units	318 du
Affordable Units	56 du
Total Residential Dwelling Units	374 du
Grocery	6,000 sq ft
Restaurant - Full-Service	32,000 sq ft
Restaurant - Quick Service	15,000 sq ft
General Retail Shopping Center	41,398 sq ft
Total Commercial Square footage	94,398 sq ft

The proposed project would remove all existing monuments on the project site, including the memorial on the corner of Norwalk Boulevard and Imperial Highway, the Freedom Memorial, the Manuel Salinas plaque, and the time capsule north of City Hall. The monuments would be relocated onsite, relocated to other areas of the City, or stored for future installation. The hexagonal planter and granite plinth with bronze signage and flagpoles would be removed. The proposed project does not change any programming and events compared to the approved project. No changes are proposed to the City Hall building, consistent with the approved project.

Each section below provides more information about each component of the proposed project. Table 2, *Summary of Approved Project vs Proposed Project*, shows the changes between the approved project and proposed

3. Proposed Project

project. The proposed project implements the approved Specific Plan and includes requests for a density bonus, concessions, and waivers under the State Density Bonus Law. The proposed density bonus, incentives, waivers, and parking standards pursuant to State Density Bonus Law are ministerial approvals and include an increase in project residential density, a reduction in setback and stepback requirements, a reduction in minimum unit size, and parking requirements, which differ from the approved project studied in the EIR.

Table 2 Summary of Approved Project vs Proposed Project

		2022 Approved Project	Proposed Project	Net Change ¹
Residential Units				
Total Units		350 units	374 units	24 units
Market Rate units		297 units	318 units	21 units
Affordable units		53 units	56 units	3 units
Commercial Square Footage (sf)				
Commercial		110,000 sf	94,398 sf	(15,602 sf)
Open Space Square Footage (sf)				
Publicly Accessible Open Space		100,000 sf	119,643 sf	19,643 sf
Private and Residential Common Open Space		200 sf/unit 70,000 sf	207 sf/unit 77,518 sf	7 sf/unit 7,518 sf
Other Building Standards				
Setback Requirements	Norwalk Boulevard	Between 5 and 20 feet	Between 16 and 43 feet	Between 11 and 23 feet
	Imperial Highway	Between 5 and 25 feet	Between 19 and 37 feet for Commercial Between 50 and 85 feet for Residential	Between 14 and 12 feet for Commercial Between 45 and 60 feet for Residential
	Avenida Manuel Salinas	Between 0 and 20 feet	Between 1 and 61 feet	Between 1 and 41 feet
	Internal driveway/ arrival drive	Between 5 and 15 feet	0 feet	(Between 5 and 15 feet)
	City Hall	50 feet minimum	Between 51 and 96 feet from building	Between 1 – 46 feet from building
Stepback from Central Spine		50 feet above 2 nd floor	26.5 feet	(23.5 feet)
Floor Area Ratio		1.5 FAR maximum (862,488 sf)	1.04 FAR (599,873 sf)	--
Building Height	Planning Area 1 and 3	8 stories or 120 feet (maximum)	7 stories or 76 feet (maximum)	--
	Planning Area 2	3 to 7 Stories	30 feet minimum ²	--
Parking Spaces				
Parking Spaces Total		1,701 spaces ³	1,542 spaces ⁴	(159 spaces) ⁵
Residential – Market Rate		1.5 spaces and 0.1 guest space per unit	469 residential spaces	--
Residential – Affordable		0.5 spaces/unit		--
Commercial		4 spaces per 1,000 gross square feet of commercial space	1,073 spaces	--

3. Proposed Project

Table 2 Summary of Approved Project vs Proposed Project

	2022 Approved Project	Proposed Project	Net Change ¹
Bicycle Parking (Commercial)	4 per first 50,000 gross square feet, 1 per each 50,000 additional SF	8 bicycle spaces provided, which meets this requirement	--
Vehicle Access Points			
Along Norwalk Boulevard	1 driveway	3 driveways	2 driveways
Along Imperial Highway	None	None	No change
Along Avenida Manuel Salinas	3 driveways	2 driveways	(1 driveway)
Along Civic Center Drive	1 driveway	1 driveway	No change

Notes:

¹ Parentheses signify a reduction.

² Meets compliance with a finding that a 30' minimum height of habitable building portions satisfies the minimum 3-story requirement

³ Includes the existing 1,050 existing parking spaces in the on-site parking structure

⁴ This figure includes 469 new spaces within the residential parking garage (28 affordable spaces), 23 new surface spaces, and includes the 1,050 existing spaces within the current parking garage.

⁵ The Norwalk Entertainment District – Civic Center Specific Plan allows two levels of additional parking at the existing parking structure (approximately 700 spaces) under both the approved project and proposed project. These parking spaces are not included within the approved or proposed project parking totals in this table.

Furthermore, the City owns the land underlying the project site with the exception of the parking structure within Planning Area 3 of the Specific Plan, which is owned by the County of Los Angeles. The City-owned land comprising the project site is the subject of ground leases between the City and Primestor Development, Inc. (Primestor). The proposed project may include new or amended ground leases or other agreements between the City and Primestor Development or other parties to implement the project development.

3.1.1 Residential

The proposed project's residential uses, including dwelling units, residential amenities, parking and private and common open space, would be provided in two buildings on the east side of the project site along Avenida Manuel Salinas. Market-rate dwelling units and amenities would be provided in Building 1 on the northeast corner of the project site and along the northside of Building 2. Buildings 1 and 2 would connect at floors 3 through 5, which would include interior hallways between the two buildings and three dwelling units off of the hallway on each floor. Affordable dwelling units, amenities and residential parking would be provided in Building 2. The dwelling units would be provided on floors 1 through 7 of Buildings 1 and 2.

3.1.2 Commercial

The proposed project's commercial component would be provided in Building 1 through Building 5. Commercial space would be provided on the ground floor of Buildings 1 and 2 and be oriented to the central spine of the project site. Buildings 3 through 5 would be located on the northwest corner of the project site near the intersection of Imperial Highway and Norwalk Boulevard. Buildings 3 through 5 would be oriented to face the central open space spine and create an engaging and landscaped breezeway between the commercial buildings.

3. Proposed Project

3.1.3 Open Space

The proposed project would provide a total of 119,643 sf of outdoor publicly accessible open space on the ground floor of the project site. The publicly accessible open space would include a central spine, spaces around the Buildings 3 through 5 (commercial buildings), and along Norwalk Boulevard in front of City Hall.

A total of 77,518 square feet of private and residential common open space would be provided in and around Buildings 1 and 2. Residential amenities would include outdoor landscaped spaces, seating areas, pool, indoor club room, lobby, library/podcast room, and indoor fitness center.

3.1.4 Parking

The proposed project would include a total of 1,542 parking spots. Residential parking would be provided in Building 2. Commercial parking would be provided in the existing County garage on the south side of the project site. In addition, the proposed project also provides 23 surface spaces to further accommodate the retail and civic uses of the Specific Plan Area. The proposed project would result in a net decrease of 159 parking spaces. Additionally, the Specific Plan would continue to allow for the construction of two additional parking levels (700 spaces) at the existing parking structure, consistent with the approved project.

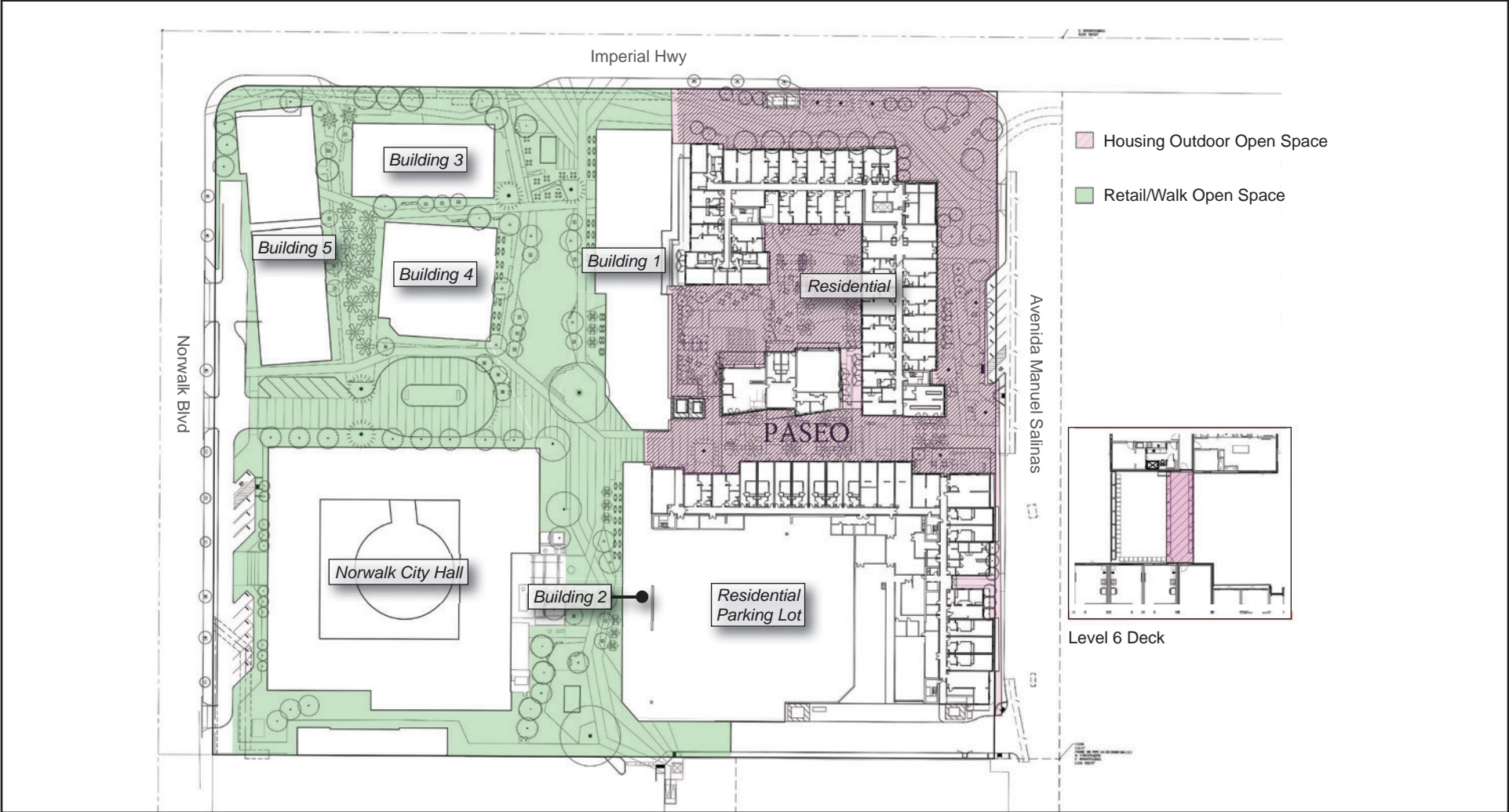
3.1.5 Vehicle and Pedestrian Circulation and Access

The proposed project would include three driveways on Norwalk Boulevard. The southernmost driveway on Norwalk Boulevard would provide access to the parking spaces along City Hall and access to the internal roundabout and commercial loading/delivery zone adjacent to Buildings 3 through 5. The center driveway along Norwalk Boulevard would provide direct access to the new internal roundabout (which would also serve as a fire lane) and commercial loading/delivery zone. The northernmost driveway on Norwalk Boulevard would serve as the main access point for the loading and delivery access associated with the commercial uses. Due to the existing raised median, the new driveways along Norwalk Boulevard would be restricted to right-turn only ingress and egress maneuvers. Compared to the approved project, the proposed project includes an internal roundabout, provides parking along City Hall, and relocates the primary commercial loading/delivery activities to the west side of the project site. The purpose of the internal roundabout is to provide temporary loading/delivery activities and provide a temporary parking location for rideshare, food delivery, and other platform-based services. See Figure 2, *Site Plan*.

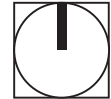
The proposed project would include two driveways along Avenida Manuel Salinas. The southernmost driveway would be a full access driveway that would provide access to the residential parking structure and connect to the existing driveway from Civic Center Drive. This driveway would also serve as a fire lane. A commercial loading and delivery dock would be provided on the ground level of the residential parking structure, similar to the approved project. The northern most driveway would be a restricted fire lane for emergency vehicles and authorized personnel. Compared to the approved project, the proposed project would include parking along Avenida Manuel Salinas and would reduce the number of driveways on Avenida Manuel Salinas. See Figure 2, *Site Plan*.

Pedestrian circulation and access would continue to be provided similar to the approved project.

Figure 2 - Site Plan



Source: Primestor 2024.



3. Proposed Project

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Figure 3 - Aerial Rendering



Source: Primestor 2024.



3. Proposed Project

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3. Proposed Project

3.1.6 Construction

While the approved project assumed traditional construction, the proposed project would utilize state-of-the-art modular buildings construction process where pre-fabricated components of the buildings would be fabricated off-site and then assembled and installed onsite. The use of modular building components reduces the scope of construction activity onsite (including eliminating the need for pile driving) and the number of construction workers and personnel onsite. Construction would occur over approximately 24 months and is anticipated to begin in 2025. Construction would include the following activities: grading and excavation, demolition and removal of hardscapes, trenching for site utilities and irrigation, modular building installation, architectural coatings, driveway and walkway construction, landscaping, signage, and street connection improvements. Soils within the proposed mixed-use building footprint areas would be removed and recompacted to a minimum depth of 8 feet below existing grade or 3 feet beneath the base of the foundations, whichever is deeper, or as otherwise required by the final geotechnical analysis. For minor site structures, such as free-standing, minor retaining walls, etc., removal and recompaction should extend as needed to penetrate through existing fill or 1 foot beneath the base of foundations, whichever is deeper or as otherwise required by the final geotechnical analysis. Within non-structural areas (i.e., areas designed to receive concrete/asphalt paving, pavers, flatwork, etc.), the soils should be removed and replaced as properly compacted fill to a minimum depth of 1 foot below existing grade or 1-foot below the proposed finished subgrade, whichever is deeper, or as otherwise required by the final geotechnical analysis.

Compared to the approved project, the proposed project's construction schedule is anticipated to be extended by one month. However, overall depth of excavation would be reduced by up to two feet.

3. Proposed Project

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4. Environmental Analysis

4.1 ENVIRONMENTAL ANALYSIS

Section 15164(b) of the CEQA Guidelines (Title 14, Cal. Code of Regs., Sections 15000 et. seq.) authorizes a lead agency to prepare an addendum to an EIR “if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.”

As discussed in Section 3, *Proposed Project*, and shown in Table 2, *Summary of Approved Project vs Proposed Project*, the proposed project would result in an additional 24 dwelling units, a decrease of 15,602 square feet of commercial space, and circulation changes compared to the proposed project. The proposed project includes requests under the State Density Bonus Law that include an increase in project residential density, a reduction in setback and stepback requirements, a reduction in minimum unit size, and parking requirements, and includes other minor changes as compared to the approved project. Due to the proposed changes compared to the approved project, this analysis looks specifically at environmental topics that could be impacted by the proposed project, including aesthetics, air quality, cultural resources, energy, greenhouse gas emissions, noise and vibration, population and housing, and transportation.

4.2 AESTHETICS

According to Appendix G of the CEQA Guidelines, a project would have a significant effect on the environment if the project would:

- | | |
|------|---|
| AE-1 | Have a substantial adverse effect on a scenic vista? |
| AE-2 | Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? |
| AE-3 | In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? |
| AE-4 | Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? |

4.2.1 Summary of Impacts in the Approved Project EIR

Scenic Vista

A scenic vista generally refers to a view that possesses visual and aesthetic qualities of high value to the community. As discussed in the certified EIR for the approved project, the Norwalk General Plan EIR

4. Environmental Analysis

determined that there are no scenic vistas in the City that require special consideration. The General Plan does not identify any scenic vistas in the city. The certified EIR considered the maximum allowable height on the project site of eight stories (as defined by the site's then-current zoning of Institutional zoning). Visual elements on the project site include City Hall (which appears to be eligible for listing as a historic resource), and the City Hall Lawn (which provides passive green space and visual relief from the urban environment). City Hall fronts Norwalk Boulevard and is generally visible from vantage points along Norwalk Boulevard between Imperial Highway to the north; along Imperial Highway (between Norwalk Boulevard to the west and Avenida Manuel Salinas to the east); and Avenida Manuel Salinas (between Imperial Highway to the north and the parking structure on-site to the south) looking across the City Hall Lawn and the surface parking lot. The Norwalk Library and the Los Angeles County Superior Court building, to the east and south respectively, are visually prominent buildings in the surrounding area and can be visible from the public right of way.

The approved project would allow new mixed-use buildings to be up to seven stories in Planning Area 2, lower than the maximum height of eight stories allowable under the then-current zoning; no changes would occur within Planning Area 1 (City Hall); and the parking structure could increase from two to five stories in Planning Area 3. The approved project would incorporate publicly accessible open space and landscaped areas. However, open space would generally be reoriented from the existing east-west configuration of the City Hall Lawn to a north-south direction extending from Imperial Highway to the County Courthouse. The project would retain the existing City Hall building. The buildout of the approved project (primarily in Planning Area 2) would generally alter views through the project site of the Norwalk Library. However, views of the Norwalk Library would remain unchanged from Avenida Manuel Salinas and Imperial Highway east of Avenida Manuel Salinas. Project buildout could also limit views from Imperial Highway through the project site to the upper portions of the Los Angeles County Superior Court building. However, views of the Los Angeles County Superior Court building would remain.

While the project site contains visual elements, views of City Hall, the City Hall Lawn, the Norwalk Library and the Los Angeles County Superior Court building are not scenic vistas, and views of these buildings would remain available from public streets and other publicly accessible locations. There are no identified scenic vistas visible through the project site. Additionally, the approved project would include publicly accessible open space providing visual relief and green spaces visible from Imperial Highway and be accessible to the public. The approved project would not substantially affect a scenic vista, and impacts would be less than significant.

Scenic Resources within a State Scenic Highway

There are no scenic highways in the vicinity of the project site. The closest officially designated scenic highway, State Route 91 is about 15 miles east, and the closest eligible scenic highway State Route 1 is approximately 10 miles south of the project site. Due to the distance between the project site and these highways, existing and intervening development, and topography, the approved project's development would not be visible from these highways. Therefore, no impact would occur.

Zoning and Other Regulations

The City of Norwalk has a population of 102,773 persons (U.S. Census 2022), so the approved project is in an urbanized area as defined by Public Resource Code Section 21071(a). Therefore, the applicable threshold is consistent with applicable regulations governing scenic quality.

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Construction activities would temporarily change the visual character of the project site and its surroundings which would include demolition, grading, site clearing, staging areas (i.e. earth stockpiling and equipment storage), building and site improvements. Construction fencing would help shield the construction areas. However, such activities would be temporary and would not conflict with zoning or other scenic quality regulations.

The certified EIR considered the project site's then-existing zoning of Institutional (eight story height limit) with a Public Facility Overlay and corresponding General Plan land use designation of Institutional (eight story height limit). The approved project included a General Plan map and text amendment to change the project site's General Plan land use designation to Mixed Use; a zone map and text amendment that would change the project site's zoning and designation to the Specific Plan; and the zone change would also remove the Public Facilities Overlay on the project site. The proposed Specific Plan would establish development and design standards and other zoning regulations governing scenic quality for the development of the project site. With approval, the Specific Plan would be consistent with the zoning ordinance, and the project would comply with the Specific Plan. Although the approved project would remove the Public Facilities Overlay on the project site, the project's architectural design would complement the City Hall and surrounding civic center uses and be consistent with the City's objectives and guidelines.

The approved project would implement the Specific Plan and its associated development standards, provide regulatory guidance, the approved project would comply with the Specific Plan's development standards. Development of the approved project would contribute to the urban character of the surrounding area and complement City Hall and neighboring visually prominent buildings, such as the Norwalk Library and the Los Angeles County Superior Court building. The approved project is consistent with the Specific Plan maximum height of eight stories in Planning Area 1 and Planning Area 3. The approved project's seven story mixed-use buildings in Planning Area 2 would be consistent with the then-current Institutional zone and would be visually consistent with existing buildings surrounding the project site.

The design guidelines encourage reinforcement of the urban edge, contemporary architectural design, accessible and visible design details, human-scale building articulation that complements neighboring developments, high-quality material, color use, and building/façade depth. These design features and ground-floor treatments would support pedestrian-oriented development, accentuate open spaces, and complement existing buildings on-site and adjacent to the project site. Future landscaping improvements would include water efficient or drought-tolerant landscaping. Signage, wayfinding, and outdoor lighting would be developed to complement building character.

The approved project is consistent with the City Center Area Plan and the General Plan, including provisions related to scenic quality. The publicly accessible open space and landscaped areas would be designed and maintained consistent with the Specific Plan's development standards. Open space through the center of the project site and around City Hall—and its elements, such as lighting and gathering areas—would be consistent with the General Plan goals to support a positive community image and compatibility with the surrounding area outlined in the Land Use and Community Design Elements. The approved project includes development standards and design guidelines to provide a pedestrian-friendly environment and harmonious architectural design with high-quality, visually consistent materials across the project site and surrounding uses.

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The certified EIR determined that the approved project would result in a less than significant impact to consistency with zoning and plans.

Light and Glare

During construction the approved project would adhere to Norwalk Municipal Code (NMC) Section 9.04.150, construction activities are prohibited from 6:00 pm, or sunset (whichever is later) to 7:00 am. If construction occurs after sunset and on-site lighting is needed, the use of temporary construction light sources from equipment and security lighting would be focused downward away from sensitive receptors and shielded to avoid light spillover. Therefore, construction activities are not anticipated to result in new sources of substantial temporary light and construction equipment would be temporary and would not represent a new source of substantial glare, a less than significant impact would occur.

The project site is in an urbanized area, surrounded by commercial, institutional, and residential development, and major roadways, Imperial Highway and Norwalk Boulevard, with significant vehicle traffic. The closest residential uses are the two multi-family residential buildings across Norwalk Boulevard, approximately 116 feet to the west of the project site. Existing light sources on the project site and its vicinity include vehicle headlights, streetlights, security lighting, and landscape/accent lighting. The lighting for the approved project would provide outdoor lighting typical of mixed-use development, open space, landscaped areas, and publicly assessable open space; which includes safety and security lighting along walkways, parking areas, and internal driveways; and accent lighting on buildings and landscaping. The buildout of the approved project would result in more lighting and reflective surfaces compared to existing conditions on the project site. However, compliance with the standards in the Specific Plan and the California Building Code (CBC) and Building Energy Efficiency standards, as amended by the NMC, would reduce light and glare impacts from the buildout of the approved project. Impacts related to light and glare associated with the operation of the approved project would be less than significant.

4.2.2 Analysis of the Proposed Project

The City of Norwalk General Plan does not identify any scenic vistas in the City that require special consideration (Norwalk 1996). The project site does not contain any scenic vistas. The project site boundaries are consistent with the approved project, and the proposed project would develop the same areas as the approved project. Views of prominent buildings in the surrounding area, such as the Norwalk Library and the Los Angeles County Superior Court Building, would remain consistent with the approved project. City Hall appears eligible for listing as a historic resource and would not be substantially altered by the proposed project. As discussed in Section 4.4, *Cultural Resources*, the proposed project would include improvements near the City Hall building that would require the removal of two character-defining features, the hexagonal planter clad in mosaic tiles and the granite plinth with bronze signage and flagpoles; however, upon proposed project completion, City Hall would remain eligible for listing.

The proposed project maintains the same overall layout as the approved project, with buildings proposed to the east and north of City Hall and a central spine of open space. Although the proposed project would deviate from the Specific Plan's minimum height requirement of 3-stories to allow for the development of 1-story buildings, the proposed one-story commercial buildings would be 30 feet in height, which is visually equivalent

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to three stories as every ten feet is comparable to 1 story. Therefore, the proposed project would be visually consistent with the minimum height requirement outlined in the Specific Plan. Views of the City Hall from Norwalk Boulevard, Imperial Highway, and the public rights-of-way would be similar to those of the approved project.

While the project site contains visual elements, including the eligible historical resource of City Hall and the existing landscaped open area of the City Hall Lawn, neither views of City Hall through the project site nor the City Hall Lawn constitute scenic vistas that the City has identified. The proposed project would construct new drive aisles and parking in front of City Hall along Norwalk Boulevard, which would require the removal of two character-defining features, the hexagonal planter clad in mosaic tiles, and the granite plinth with bronze signage and flagpoles. The proposed project would also include a new roundabout north of City Hall, which would require the removal of landscaping and the time capsule. Similar to the approved project, while the proposed project would result in changes in the visual environment, including views of City Hall and area buildings such as the Norwalk Library and the Los Angeles County Superior Court building, these views are not scenic vistas, and views of these buildings would remain available from public streets and other publicly accessible locations. Therefore, their proposed project would not substantially affect a scenic vista, and impacts would be less than significant. The proposed project would not result in any new or more severe significant impacts than those identified in the approved project EIR. No new information would require the preparation of a supplemental or subsequent EIR.

State Route 91 and State Route 1 remain the closest officially designated and eligible scenic highways at 15 miles and 10 miles away, respectively (Caltrans 2024). As with the approved project, the project site would not be visible from either highway, and no impacts would occur. The proposed project would not result in any new or more severe significant impacts than those identified in the approved project EIR. No new information would require the preparation of a supplemental or subsequent EIR.

The City of Norwalk with a population of 102,773 persons is an urbanized area and must meet the applicable regulations governing scenic quality (US Census 2020). Aesthetic changes resulting from construction of the proposed project would remain temporary and similar to the approved project. The construction of the proposed project would not conflict with zoning or other scenic quality regulations. The proposed project complies with the Specific Plan, which provides the zoning for the project site. As discussed in Section 3, *Project Description*, the proposed project would comply with applicable requirements of the Specific Plan, and would utilize the State Density Bonus Law to allow for increases in residential density, a reduction in setback and stepback requirements, a reduction in minimum unit size, and parking requirements. Although the proposed project would result in changes to setbacks and stepbacks compared to the approved project, the proposed project would remain visually consistent with its surrounding uses. The proposed project would develop a pedestrian-friendly environment with complementary architectural design and materials across the project site and surrounding uses. As with the approved project, the proposed project would support the General Plan and City Center Area Plan. The proposed project would not conflict with applicable zoning and other regulations governing scenic quality and a less than significant impact would occur. No new information would require the preparation of a supplemental or subsequent EIR.

The proposed project would generate construction activities similar to or less than those of the approved project. Construction activities and sources of light would remain constant with the approved project. Sources

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of light and glare during construction activities would be considered temporary and would not represent a new source of substantial glare. The proposed project would adhere to Norwalk Municipal Code (NMC) Section 9.04.150, construction activities are prohibited from 6:00 pm, or sunset (whichever is later) to 7:00 am. Thus, impacts from light and glare during the construction phase would result in a less than significant impact. The proposed project would not result in any new or more severe significant impacts than those identified in the approved project EIR. No new information would require the preparation of a supplemental or subsequent EIR.

Sources of light and glare during operation would be similar to the approved project which includes internal lights emanating from the mixed-use development and retail stores; security lighting along walkways, parking areas, and internal driveways; and accent lighting on buildings and landscaping. The proposed project's parking and drive aisles along Norwalk Boulevard and Avenida Manuel Salinas would increase vehicles onsite in these areas. However, the addition of vehicles onsite along Norwalk Boulevard and Avenida Manuel Salinas would not introduce a substantial new source of light and glare since vehicles already travel along both roadways. Additionally, the siting of the retail buildings with publicly accessible open space between Buildings 3 through 5 is proposed to comply with the Specific Plan, California Building Code (CBC) including energy efficiency standards, as amended by the Norwalk Municipal Code. Further due to the siting of Buildings 3 through 5, potential light and glare from the publicly accessible open space area between the building would be largely shielded from public rights-of-way (i.e. Norwalk Boulevard and Imperial Highway). Potential light and glare in the publicly accessible open space area would be similar to the existing urban setting of the project site. Therefore, impacts would be less than significant and no new information would require preparation of a supplemental or subsequent EIR. The proposed project would not result in any new or more severe significant impacts than those identified in the approved project EIR.

4.3 AIR QUALITY

According to Appendix G of the CEQA Guidelines, a project would have a significant effect on the environment if the project would:

- AQ-1 Conflict with or obstruct implementation of the applicable air quality plan?
- AQ-2 Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?
- AQ-3 Expose sensitive receptors to substantial pollutant concentrations?
- AQ-4 Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

4.3.1 Summary of Impacts in the Approved Project EIR

Air Quality Management Plan

The certified EIR determined that the approved project would not conflict or obstruct the implementation of South Coast Air Quality Management District's (AQMD) 2016 Air Quality Management Plan (AQMP).

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Although the approved project required a zone change and general plan amendment, the approved project's population contribution would be within Southern California Association of Governments (SCAG's) forecast growth projections for Norwalk, Los Angeles County, and the 2016 AQMP.

Construction and Operational Emissions

Criteria air pollutant emissions associated with construction and operation of the approved project were determined to not exceed the South Coast AQMD's regional emissions thresholds and were considered less than significant.

Sensitive Receptors

The certified EIR compared the approved project's maximum daily construction emissions to the South Coast AQMD's Construction-Phase Localized Significance Thresholds (LSTs) and determined that the approved project would not exceed the applicable LSTs. The certified EIR also conducted a construction health risk assessment, which concluded that construction activities associated with the approved project would result in an increased cancer risk for off-site receptors that exceeds South Coast AQMD's 10 in a million-significance threshold. Consequently, Mitigation Measure AQ-1 was incorporated to require the use of construction equipment that meets Tier 4 Interim emissions standards for engines over 50 horsepower. Incorporation of Mitigation Measure AQ-1 reduced the potential impacts associated with construction health risk to below the South Coast AQMD cancer risk threshold, mitigating impacts to less than significant. Furthermore, the approved project was determined to have less than significant localized air quality impacts associated with operational activities. The approved project did not include land uses that would generate substantial quantities of criteria air pollutants and toxic air contaminants (TACs) nor would its net increase in peak trips exceed the number of peak-hour vehicle trips needed to generate a significant CO hotspot at nearby intersections.

Odors

The certified EIR also determined that the approved project would not result in odor impacts and that adherence to South Coast AQMD Rule 402 would minimize and provide control for potential odors associated with construction and operational activities.

The approved project EIR Mitigation Measure AQ-1 is reproduced below.

AQ-1 Construction contractors shall, at minimum, use equipment that meet the United States Environmental Protection Agency's (EPA) Tier 4 Interim emissions standards for off-road diesel-powered construction equipment of 50 horsepower or more in use a total of 20 hours or more, unless it can be demonstrated to the City of Norwalk Community Development Department that such equipment is not commercially available. For purposes of this mitigation measure, "commercially available" shall mean the availability of Tier 4 Interim engines similar to the availability for other large-scale construction projects in the city occurring at the same time and taking into consideration factors such as (i) potential significant delays to critical-path timing of construction and (ii) geographic proximity to the project site of Tier 4 Interim equipment. Where such equipment is not commercially available, as demonstrated by the construction contractor, Tier 3 equipment retrofitted with a California Air Resources Board's Level 3 Verified Diesel Emissions Control Strategy (VDECS) shall be

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used. This requirement shall apply to all activities (e.g., foundation, pile driving, vertical construction, etc.) related to construction of:

- a. Existing Commercial Parking Garage Improvements (e.g., additional parking levels)
- b. Proposed Buildings and Structures (e.g., proposed mixed-use buildings)

In addition, the following shall also be completed:

- Prior to construction, the project engineer shall ensure that all construction (e.g., grading and building) plans clearly show the requirement for EPA Tier 4 Interim emissions standards for construction equipment of 50 horsepower or more and in use a total of 20 hours or more for the activities stated above.
- During construction, the construction contractor shall maintain a list of all operating equipment in use on the construction site for a total of 20 hours or more for verification by the City of Norwalk.
- The construction equipment list shall state the makes, models, Equipment Identification Numbers, Engine Family Numbers, and number of construction equipment on-site. Equipment shall be properly serviced and maintained in accordance with the manufacturer's recommendations.
- To the extent that equipment is available and cost-effective, contractors shall use electric, hybrid, or alternate-fueled off-road construction equipment.
- Contractors shall use electric construction tools, such as saws, drills, and compressors, where grid electricity is available.
- Construction contractors shall ensure that all nonessential idling of construction equipment is restricted to five minutes or less in compliance with Section 2449 of the California Code of Regulations, Title 13, Article 4.8, Chapter 9.

4.3.2 Analysis of the Proposed Project

A consistency determination with the AQMP plays an important role in local agency project review by linking local planning and individual projects to the AQMP. Because the AQMP strategy is based on projections from local general plans and Southern California Association of Governments (SCAG's) regional growth forecasts, projects that are consistent with the local general plan are considered consistent with the air-quality-related regional plan. Typically, only large, regionally significant projects have the potential to affect regional growth projections.

The proposed project would include an additional 24 dwelling units (for a total of 374 residential units) and a decrease of 15,602 square feet of commercial space as compared to what was evaluated under the approved project (see project changes in Table 2, *Summary of Approved Project vs Proposed Project*). General construction labor is similarly expected to be available from the local and regional labor pool, which would not directly or indirectly result in unplanned growth in the project area. As discussed in Section 4.8, *Population and Housing*, of

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this Addendum, the proposed project would generate an additional 86 residents and 62 employment opportunities compared to the approved project (see Table 3, *Proposed Project's Population and Housing Contribution*, and Table 4, *Proposed Project Employee Generation*). However, the buildout of the proposed project is well within the projected housing and employee growth for both the City of Norwalk and Los Angeles County, as identified in Section 4.8, *Population and Housing*. Additionally, the proposed project's 24 additional dwelling units would contribute to the City's 5,034-unit Regional Housing Needs Assessment (RHNA) allocation for the 2021-2029 period (Norwalk Community Development Department 2023). Therefore, buildout of the proposed project would not substantially affect demographic projections beyond what is accounted for in the current 2022 AQMP, and impacts would be less than significant. No new information would require the preparation of a supplemental or subsequent EIR.

As described in Section 3.1.6, *Project Description, Construction*, unlike the approved project, the proposed project would include state-of-the-art modular buildings that would be assembled and installed onsite. This modular construction method reduces the scope and use of construction equipment onsite and the number of construction workers and personnel onsite. Project construction would result in less ground-disturbing activities as previously analyzed in the certified EIR (i.e. the depth of excavation reduces). As a result, the proposed project would not result in substantial increase in maximum daily air pollutant emissions during construction beyond that of the approved project such that South Coast AQMD's significance thresholds would be exceeded. Moreover, as the proposed project would result in the development of a similar amount of building space as the approved project but would utilize a less intensive construction method, the proposed project is likely to result in a decrease in maximum daily air pollutant emissions during building-specific construction activities (i.e., activities associated with erecting the structure) when compared to the approved project, and impacts would be less than significant. The proposed project would not result in any new or more severe significant impacts than those identified in the approved project EIR. No new information would require the preparation of a supplemental or subsequent EIR.

Operation of the proposed project would generate similar criteria air pollutant emissions from area sources (e.g., landscaping equipment, architectural coating) and energy use (i.e., natural gas used for cooking in commercial uses) when compared to the approved project. With an additional 24 dwelling units and a decrease of 15,602 square feet of commercial space, the changes in building square footage would result in limited changes to area sources and energy use source emissions. Additionally, emissions from building energy use would be minimized because the new mixed-use buildings would meet the current California Building and Energy Efficiency Standards; each iteration of the California Building and Energy Efficiency Standards is assumed to achieve greater energy efficiency performance in new buildings than the last. The proposed project would generate fewer emissions from on-road mobile sources because the proposed project is anticipated to generate 1,141 average daily vehicle trips fewer than the approved project (see Appendix B). Therefore, buildout of the proposed project would result in similar or fewer operation-phase emissions compared to what was analyzed in the certified EIR, and impacts would be less than significant. The proposed project would not result in any new or more severe significant impacts than those identified in the approved project EIR. No new information would require the preparation of a supplemental or subsequent EIR.

Moreover, Mitigation Measure AQ-1 included in the certified EIR would apply to the proposed project. The proposed project is not expected to result in greater maximum daily construction emissions when compared to

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the approved project, and implementation of Mitigation Measure AQ-1 would further ensure that construction health risk impacts are less than significant during construction of the proposed project. During operation, the proposed project, like the approved project, would not result in creation of land uses that require the use of vehicles, equipment, or materials that would generate substantial TAC emissions that could expose sensitive receptors to substantial pollutant concentrations. The proposed project would result in a decrease of 48 am and 111 pm peak hour vehicle trips at buildout compared to the approved project (see Appendix B). Therefore, the proposed project would not introduce new vehicle trips which may result in a CO hotspot when combined with existing traffic volumes. As such, the proposed project would not expose sensitive receptors to substantial pollutant concentrations or greater health risk impacts during construction or operation than those analyzed in the certified EIR. A less than significant impact would occur, and no new information would require the preparation of a supplemental or subsequent EIR. The proposed project would not result in any new or more severe significant impacts than those identified in the approved project EIR.

With respect to odor impacts, construction emissions and odors for the proposed project would increase temporarily in the vicinity of the project site and cease upon completion of construction. In addition, the proposed project, same as the approved project, would not introduce new land uses which are known odor generators, such as landfills or composting facilities; therefore, the proposed project's operational odor impacts would not be any greater than those of the approved project. Impacts from odors associated with the proposed project would result in a less than significant impact and no new information would require the preparation of a supplemental or subsequent EIR.

4.4 CULTURAL RESOURCES

According to Appendix G of the CEQA Guidelines, a project would have a significant effect on the environment if the project would:

- CUL-1 Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?
- CUL-2 Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?
- CUL-3 Disturb any human remains, including those interred outside of dedicated cemeteries?

4.4.1 Summary of Impacts in the Approved Project EIR

Historical Resources

One building within the project site, City Hall, may meet the definition of a "historical resource" for purposes of CEQA. Landscaping around the outer perimeter of the Norwalk City Hall building is not considered a part of the eligible historical resource, nor are any other buildings; as they are not associated with the historical and architectural significance of the building. The surrounding landscaping is not inclusive of the character-defining hexagonal planter further discussed below in Section 4.4.2, *Analysis of the Proposed Project*.

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The approved project assumed construction of a mixed-use development around City Hall, with the nearest pile driven approximately 50 feet from the historical resources. Due to the distance, any damage as a result of pile driving activities to the City Hall would be minor, easily repaired, and not anticipated to result in “material impairment” of the resource. Therefore, construction of the approved project would not cause a significant impact on a historical resource, and a less than significant impact would occur. Additionally, Mitigation Measure NOI-2 would further ensure that any vibration-related impacts associated with pile-driving activities during construction would reduce any impacts to less than significant.

No changes or direct impacts to the Norwalk City Hall would occur as a result of the approved project. No character-defining features of or associated with the Norwalk City Hall would be removed or altered. The approved project would include the removal of the City Hall Lawn, the surface parking lot, and modifications to the existing landscape adjacent to the City to accommodate the new mixed-use development. The approved project would include the construction of two additional parking levels to the existing parking structure. However, City Hall Lawn, the surface parking lot, the existing landscaping, and the parking structure do not satisfy the definition of a “historical resource” and would not result in an impact to a historical resource.

The approved project would be substantially taller than the historical resource; however, the new mixed-use buildings would be physically separated from the historical resource by a minimum distance of 50 feet on the north and a minimum of 50 feet on the east. Construction of the new mixed-use development would not impair the visibility of this façade or change how the building is experienced when it is viewed from Norwalk Boulevard. Because of its location on the project site, the new mixed-use buildings may limit public views of the historical resource’s north and east which are considered secondary and are visually subservient to the primary (west) façade. The approved project would not significantly change how the historical resource is experienced from public view as the primary east and north façades would be visible from within publicly accessible areas of the approved project.

The approved project would not include changes to the historical resource itself upon completion of the approved project; Norwalk City Hall would continue to retain its integrity of location, design, its character-defining features; however, the integrity of setting would be diminished. The removal of the unrelated, non-historic surface parking lot and perimeter landscaping (including the City Hall Lawn) and the development of the approved project’s mixed-use buildings in their place would change the immediate setting of the historical resource and would introduce residential and commercial uses that do not currently exist. Although the integrity of setting would be diminished, the overall integrity of the Norwalk City Hall would not be diminished and it would remain eligible for federal and state listing upon approved project completion. Therefore, the approved project would not cause a substantial adverse change in the significance of City Hall, a historical resource, pursuant to Section 15064.5, and a less than significant impact would occur.

Furthermore, the approved project would not impact the potential historic district as no changes to the four contributing buildings would occur and they would continue to operate as governmental and civic functions. Similarly, the integrity of setting would be diminished; however, this, in and of itself, would not diminish the setting of the potential district as to where its significance would be materially impaired. The potential district would continue to retain its potential historic district. Therefore, the approved project would not cause a substantial adverse change in the significance of a historical resource under Section 15064.5, and a less than significant impact would occur.

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Archaeological Resources

The project site has already been subjected to ground-disturbing activities associated with the existing development; therefore, archaeological sensitivity is considered low. The project site and surrounding areas do not contain any archaeological resources based on a records search and an intensive pedestrian site survey by a qualified archaeologist. Based on the results of the cultural records search, the project site has a low sensitivity for prehistoric archaeological resources. Nevertheless, since the approved project involves earthwork and ground disturbance, the potential exists that unknown archaeological resources may be unearthed. Implementation of Mitigation Measures CUL-1 and CUL-2 would reduce impact to a less than significant level.

Human Remains

The project site was developed with the existing buildings, parking lots, hardscape, and landscaping starting in 1965. In addition to previous ground-disturbing activities, the construction of the approved project would involve ground disturbance to a depth of approximately 10 feet. Thus, the likelihood of discovering unknown human remains is considered low. However, earthwork activities associated with the construction of the project site still have the potential to unearth unknown human remains. In the event human remains are discovered, adherence to state and federal policies including California Health and Safety Code Section 7050.5, and CEQA Guidelines Section 15064.5(e) would ensure that the approved project's potential disturbance of human remains is less than significant. Additionally, Mitigation Measures TCR-2 and TCR-3 would be incorporated as part of the approved project which identifies procedures in the unlikely event of tribal human remains and funerary objects.

The approved project EIR Mitigation Measures CUL-1 and CUL-2 are reproduced below.

- CUL-1 If unanticipated cultural resources discoveries are made, all work must halt within 50 feet until a qualified archaeologist can evaluate the significance of the find. Work may resume immediately outside of the 50-foot radius.
- CUL-2 If the qualified archaeologist determines that the find is significant, an archaeological treatment plan must be developed to mitigate harm to the resource and will include procedures for data recovery in the event that the resource cannot be avoided.

4.4.2 Analysis of the Proposed Project

The analysis in this section is based in part on the Supplemental Historic Resources Analysis prepared by Architectural Resources Group (dated October 9, 2024) and contained in Appendix A.

The Norwalk City Hall was identified as eligible for federal (National Register of Historic Places) and state (California Register of Historical Resources); however, no other buildings or improvements on the project site including the parking structure, the County-owned accessory building, the perimeter landscaping and City Hall Lawn do not satisfy eligibility criteria for federal or state listing. Additionally, the small cluster of civic buildings to the south and east of the project site is a potential historical district.

The proposed project boundaries and areas of disturbance (i.e. City Hall Lawn and surface parking lot) would remain consistent with the approved project. Project construction would include similar or reduced ground-

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disturbing activities as previously analyzed within the approved project. Although the proposed drop-off roundabout/fire lane would be located north of the Norwalk City Hall, the minimum 50-foot setback would remain in place, consistent with the approved project. Due to the distance, any damage from construction activities would be minor, easily repaired, and is not anticipated to result in “material impairment” of the resource. The proposed project will utilize state-of-the-art modular buildings that would be assembled and installed onsite that would eliminate the need for pile driving and reduce vibration compared to the approved project analyzed in the certified EIR. Further, the proposed project would be required to submit a construction noise mitigation plan to the City Engineer for review and approval prior to issuance of a grading or building permit, and incorporation of Mitigation Measure NOI-2 would ensure that any vibration-related impacts associated with construction activities would be reduced to less than significant.

As discussed in Section 4.1, *Aesthetics*, of this Addendum, the design and heights of the structures to the north of City Hall would differ from the approved project, as the proposed project structures to the north would include retail uses in one story buildings at a height of approximately 35 feet, rather than the seven-story development planned for this area in the approved project. However, the proposed project’s buildings would be no taller than the buildings in the approved project and would be no closer in proximity to City Hall. Therefore, the proposed project would continue to meet the SOI Standards 9 and 10, consistent with the approved project.

Furthermore, the proposed project would construct parking spaces west of the Norwalk City Hall and construct a new vehicular driveway and roundabout to the north of the Norwalk City Hall. These parking and driveway modifications would occur within non-historic landscaped areas on the perimeter of the Norwalk City Hall. Such improvements would require the removal of two character-defining features, the hexagonal planter clad in mosaic tiles, and the granite plinth with bronze signage and flagpoles. The removal of these character-defining features would not diminish the integrity of the eligible historical resource (Norwalk City Hall) and Norwalk City Hall would remain eligible for federal and state listing upon proposed project completion (see Appendix A). This is because the majority of character-defining features of Norwalk City Hall would remain fully intact, and the two character-defining features proposed for removal constitute a small portion of the resource’s character-defining features. The resource would continue to retain sufficient integrity to be eligible for listing in the National Register and California Register at project completion. Therefore, the proposed project would not result in a direct impact to a historical resource (Norwalk City Hall) and impacts would be less than significant. The proposed project would not result in any new or more severe significant impacts than those identified in the approved project EIR. No new information would require the preparation of a supplemental or subsequent EIR.

The potential historical district could include the Norwalk City Hall and buildings located outside the project site and Specific Plan area, consisting of the Southeast Superior Courts building, the Norwalk Library, and the Norwalk Sheriff’s Station. Similar to the approved project all project construction would remain within the project site and no indirect impacts to the potential historic district would occur. The proposed project would introduce new development to the existing parking lots and interstitial spaces, which may change the setting of the potential district; however, the proposed project would not alter or demolish any of the potential district’s four contributing buildings. The four buildings would continue to operate their governmental and civic functions. Although the proposed project may result in changes to the setting of the potential district, similar

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to the approved project, the potential district will continue to retain sufficient integrity to convey its historical significance at project completion. Therefore, the proposed project would not result in any indirect impacts to the potential historic district adjacent to the project site and impacts would be less than significant. The proposed project would not result in any new or more severe significant impacts than those identified in the approved project EIR. No new information would require the preparation of a supplemental or subsequent EIR.

No new archaeological information has been found, and the proposed site would continue to contain low archaeological sensitivity. Nevertheless, earthwork and ground disturbing activities, even though reduced from the approved project, have the potential to unearth unknown archaeological resources and Mitigation Measures CUL-1 and CUL-2 from the approved project would reduce impact to a less than significant level. The proposed project would not result in any new or more severe significant impacts than those identified in the approved project EIR. No new information would require the preparation of a supplemental or subsequent EIR.

Similarly, the likelihood of discovering unknown human remains is considered low due to the developed nature of the project site. Even so, earthwork activities associated with the construction of the project site still have the potential to unearth unknown human remains. Adherence to state and federal policies, and TCR-1 and TCR-2 of the approved project would reduce impact to a less than significant level. The proposed project would not result in any new or more severe significant impacts than those identified in the approved project EIR. No new information would require the preparation of a supplemental or subsequent EIR.

4.5 ENERGY

According to Appendix G of the CEQA Guidelines, a project would have a significant effect on the environment if the project would:

- EN-1 Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?
- EN-2 Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

4.5.1 Summary of Impacts in the Approved Project EIR

Short-term and Long-term Energy Consumption

The certified EIR determined that implementation of the approved project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources. During construction, energy demand from electricity, operation of construction equipment, and transportation would temporarily increase and would cease upon completion of the development accommodated under the approved project. While operation of future development accommodated under the approved project would generate additional electricity and natural gas demand compared to existing conditions, development would be required to comply with the requirements of the Building Energy Efficiency Standards and California Green Building Standards Code (CALGreen). Consumption of transportation energy would also increase from existing conditions during operation; however, fuel efficiency for vehicles would improve in future years due to compliance with Corporate Average Fuel Economy (CAFE) standards by car manufacturers, and the approved

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project's location near public transit would help reduce transportation-related fuel usage by being in proximity to regional travel routes. Furthermore, the approved project would implement Mitigation Measure TRA-1, which requires a Transportation Demand Management (TDM) program that would reduce vehicle trips and associated vehicle miles traveled (VMT).

State or Local Plan for Renewable Energy or Energy Efficiency

The approved project would comply with the applicable requirements of the Building Energy Efficiency Standards and CALGreen. Consequently, the approved project would be generally consistent with the overall objective of the City's Energy Action Plan (EAP) to increase energy efficiency. Overall, the approved project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency (i.e., California Renewable Portfolio Standard [RPS] Program and the City of Norwalk EAP).

4.5.2 Analysis of the Proposed Project

Similar to the approved project, construction of the proposed project would create temporary increased demands for electricity and vehicle fuels compared to existing conditions and would result in short-term transportation-related energy use. However, the majority of construction equipment would be gas- or diesel-powered and it is not anticipated that construction equipment would be powered by natural gas for either the approved project or the proposed project. Therefore, impacts would continue to be less than significant with respect to short-term electricity and natural gas usage. The use of energy resources by vehicles and equipment would fluctuate according to the phase of construction and would be temporary. Fuel efficiency of vehicles would continue to improve due to statewide fuel reduction strategies and regulatory compliances (e.g., CAFE standards), thus fuel usage during construction is anticipated to be more fuel efficient under the proposed project in comparison to the approved project. In addition, the use of modular buildings is expected to reduce the amount of off-road construction equipment needs, thereby reducing consumption of equipment fuel use during construction when compared with the approved project. Therefore, impacts related to transportation energy use during construction would be temporary and would not require expanded energy supplies or the construction of new infrastructure. Thus, energy use during construction of the proposed project would not be considered inefficient, wasteful, or unnecessary, and impacts would be less than significant.

Long-term operation of the proposed project, similar to the approved project, would generate demand for electricity and transportation energy use. The proposed project would be consistent with the requirements of the Building Energy Efficiency Standards and CALGreen. The 2022 Building Energy Efficiency Standards became effective in January 2023 and would be more stringent than the standards that applied to the approved project. Compliance with these requirements would support the energy conservation goals outlined in Appendix F of the CEQA Guidelines because the proposed project would be required, under the Building Energy Efficiency Standards, to either incorporate the use of renewable energy such as photovoltaic (PV) systems and battery energy storage (BES) systems or trade those out by increasing the efficiency performance of other components of the project design (e.g., mechanical, fenestration, lighting). Moreover, implementation of MM GHG-1 would require the proposed project to be designed all-electric, thereby precluding the installation of natural gas plumbing and use of natural gas-fired appliances associated with the building. Compliance with existing codes and MM GHG-1 would decrease overall reliance on fossil fuels, and Southern California Edison's (SCE) compliance with the RPS program would increase reliance on renewable energy

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sources for electricity generation through 2045. Therefore, operation of the proposed project, similar to approved project, would result in less than significant impacts with respect to operational building energy usage.

While the fuel type and efficiency of vehicles used by the proposed project, such as the average miles per gallon of gasoline, is unknown, transportation energy consumption is expected to decrease when compared to the approved project. Based on the traffic study prepared for the proposed project, the proposed project is anticipated to generate 1,141 average daily vehicle trips fewer than the approved project (see Appendix B). The project location would remain the same as the approved project to provide more housing opportunities near commercial opportunities, civic services, and public transit along Imperial Highway and Norwalk Boulevard. Therefore, transportation-related energy use would be slightly reduced compared to the approved project. In addition, like the approved project, the proposed project would implement Mitigation Measure TRA-1, which requires a Transportation Demand Management (TDM) program that will reduce vehicle trips and associated VMT. As such, impacts would be less than significant with respect to operation-related fuel usage for the proposed project, and may be slightly less as compared to the approved project. Overall, energy use during construction and operation of the proposed project would not be considered inefficient, wasteful, or unnecessary. Impacts would be considered less than significant and no new information would require preparation of a supplemental or subsequent EIR. The proposed project would not result in any new or more severe significant impacts than those identified in the approved project EIR.

As discussed previously, the proposed project would be consistent with the requirements of the most current Building Energy Efficiency Standards and CALGreen, which would be more stringent than the standards that were assumed to apply to the approved project in the analysis in the certified EIR. Therefore, implementation of the proposed project would not conflict or obstruct implementation of California's RPS Program. The proposed project would not alter the existing Norwalk City Hall and consequently the proposed project would not interfere with the City's Energy Action Plan's (EAP) goal to continue to improve the energy usage of City Hall and to meet the City's long-term energy efficiency goals (Norwalk 2015). Similar to the approved project, implementation of the proposed project would not conflict or obstruct plans for renewable energy and energy efficiency and no impact would occur. The proposed project would not result in any new or more severe significant impacts than those identified in the approved project EIR. No new information would require the preparation of a supplemental or subsequent EIR.

4.6 GREENHOUSE GAS EMISSIONS

According to Appendix G of the CEQA Guidelines, a project would have a significant effect on the environment if the project would:

- GHG-1 Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- GHG-2 Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

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4.6.1 Summary of Impacts in the Approved Project EIR

Greenhouse Gas Emissions

The certified EIR modeled the operational and construction GHG emissions of the approved project and compared these emissions to the existing uses at the project site. Due to the scale and amount of vehicle miles traveled (VMT) associated with approved project operations, the approved project would result in a net increase in GHG emissions that would exceed the South Coast AQMD's bright-line threshold of 3,000 metric tons of carbon dioxide equivalent (MTCO₂e). Implementation of Mitigation Measures TRA-1, GHG-1, and GHG-2 would reduce operational emissions; however, no additional mitigation was identified in the certified EIR as feasible that could reduce the magnitude of emissions from the approved project's transportation sector. Consequently, project-related GHG emissions would cumulatively contribute to statewide GHG emissions and impacts were determined to be significant and unavoidable.

Consistency with Greenhouse Gas Reduction Plans

The approved project was found to be consistent with the 2017 California Air Resources Board (CARB) Scoping Plan, SCAG's 2020–2045 RTP/SCS (Connect SoCal), and the City's Energy Action Plan (EAP). The approved project would be required to adhere to the applicable air quality regulations that help to implement the 2017 Scoping Plan, including the latest CALGreen and Building Energy Efficiency standards. The approved project was determined to not conflict with the regional strategies of Connect SoCal since the mixed-use development allowed under the approved project would contribute to reducing VMT between residential, commercial, and service needs. Lastly, the approved project would not alter the existing Norwalk City Hall and would provide new mixed-use buildings that would meet the current Building Energy Efficiency Standards. Therefore, the approved project would not interfere with the EAP to continue to improve the energy usage of City Hall and to meet the City's long-term energy efficiency goals.

The approved project EIR Mitigation Measures GHG-1 and GHG-2 are reproduced below.

- GHG-1 The project developer(s) shall design and build all multifamily residential units to meet/include the following:
- a) Tier 2 requirements for Division A5.1, Planning and Design, as outlined under Sections A5.106.5.1.2 and A5.106.5.1.3 of Appendix A5, Nonresidential Voluntary Measures, of the 2019 California Green Building Standards Code for Designated Parking for Clean Air Vehicles.
 - b) Tier 2 requirements for Division A5.1, Planning and Design, as outlined under Sections A5.106.5.3.2, A5.106.5.3.3, and A5.106.5.3.4 of Appendix A5, Nonresidential Voluntary Measures, of the 2019 California Green Building Standards Code for Electric Vehicle (EV) Charging.
 - c) Tier 2 requirements for Division A5.2, Energy Efficiency, as outlined under Section A5.203.1.1.2.2 of Appendix A5, Nonresidential Voluntary Measures, of the 2019 California Green Building Standards Code.

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- d) Tier 2 requirements for Division A5.211, Renewable Energy, of Appendix A5, Nonresidential Voluntary Measures, of the 2019 California Green Building Standards Code.
- e) Tier 2 requirements for Division A5.3, Water Efficiency and Conservation, as outlined under Section A5.303.2.3.2 of Appendix A5, Nonresidential Voluntary Measures, of the 2019 California Green Building Standards Code.
- f) No wood-burning or gas-powered fireplaces shall be installed in any of the dwelling units.
- g) All buildings shall be electric, meaning that electricity is the primary source of energy for water heating; mechanical; heating, ventilation, and air conditioning (HVAC) (i.e., space-heating and space cooling); cooking; and clothes-drying.
- h) All major appliances provided/installed (e.g., dishwashers, refrigerators, clothes washers and dryers, and water heaters) shall be electric-powered EnergyStar-certified or of equivalent energy efficiency, where applicable.

Prior to the issuance of building permits for new development projects within the project site, the project developer(s) shall provide documentation (e.g., building plans, site plans) to the City of Norwalk Planning Division to verify implementation of the design requirements specified in this mitigation measure. Prior to the issuance of the certificate of occupancy, the City shall verify implementation of these design requirements.

GHG-2 The project developer(s) shall design the public-use parking garage for the non-residential portion of the project (not within the existing parking structure that would also be used for parking) to:

- a) Provide electric vehicle (EV) charging stations. At minimum, the number of EV charging stations shall equal the Tier 2 Nonresidential Voluntary Measures of the California Green Building Standards Code.
- b) Provide parking for low-emitting, fuel-efficient, and carpool/van vehicles. At minimum, the number of preferential parking spaces shall equal the Tier 2 Nonresidential Voluntary Measures of the California Green Building Standards.

Prior to the issuance of building permits for new development projects on the project site, the project developer(s) shall provide documentation (e.g., site plans) to the City of Norwalk Planning Division to verify implementation of the of the design requirements specified in this mitigation measure. Prior to the issuance of the certificate of occupancy, the City shall verify implementation of these design requirements.

4.6.2 Analysis of the Proposed Project

As discussed in Section 4.2, *Air Quality*, it is anticipated that the construction activities and construction-related emissions under the proposed project would be similar or less than to what was previously considered in the

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certified EIR. As with the development analyzed under the approved project, operation of the proposed project would result in an increase in water demand, wastewater and solid waste generation, area sources (e.g., consumer cleaning products), as well as energy and refrigerant usage. Operational GHG emissions from building energy use would be minimized because the mixed-use buildings shall be constructed to meet the latest Building Energy Efficiency Standards and Green Building Standards Code (CALGreen). The proposed mixed-use development would include residential and commercial uses on the same project site thus promoting interactive use of onsite facilities which reduces the need for vehicular transport. Project site location is also near bus stops along Imperial Highway and Norwalk Boulevard, which would help promote use of public transportation and reduce long-term GHG emissions. Based on the traffic study, the proposed project is anticipated to generate 1,141 average daily vehicle trips fewer than the approved project and further reduce mobile source emissions (see Appendix B), which were determined in the certified EIR as the largest GHG emission source for the approved project (80 percent). Moreover, Mitigation Measure TRA-1, GHG-1, and GHG-2 included in the certified EIR would still be applicable to the proposed project, which would reduce impacts associated with operational emissions. Mitigation Measure GHG-1 and GHG-2 would require installation of electric-vehicle-capable charging spaces in compliance with Tier 2 voluntary standards of CALGreen for the new residential building and public-use parking garage and require new residential uses to be 100 percent electric. Therefore, implementation of the proposed project is not anticipated to result in a substantial increase in GHG emissions compared to what was previously considered in the certified EIR. The proposed project GHG emissions would remain significant and unavoidable. The proposed project would not result in any new or more severe significant impacts than those identified in the approved project EIR. No new information would require the preparation of a supplemental or subsequent EIR.

The proposed project's GHG emissions would be reduced through compliance with the programs and regulations identified by the Scoping Plan and implemented by state, regional, and local agencies to achieve the statewide GHG reduction goals of Assembly Bill (AB) 32, Senate Bill (SB) 32, and AB 1279. Thus, the proposed project would not conflict with the above statewide strategies identified to implement the CARB 2022 Scoping Plan. Similar to the approved project, the proposed project would result in a mixed-use project with multifamily residential and commercial development near civic facilities, commercial, and entertainment opportunities that would serve the future residents and existing local population. This would contribute to reducing the VMT between residential, commercial, and service needs. Therefore, the proposed project would not interfere with SCAG's ability to implement the regional strategies in Connect SoCal (SCAG 2024). Lastly, the proposed project would not alter the existing Norwalk City Hall and would provide new mixed-use buildings that would meet the current Building Energy Efficiency Standards. Therefore, the proposed project would not interfere with the EAP's goal to continue to improve the energy usage of City Hall and to meet the City's long-term energy efficiency goals (Norwalk 2015). Impacts would not be more severe than previously analyzed for the approved project, and no new mitigation would be required. The proposed project GHG emissions would remain significant and unavoidable; however, the proposed project would not result in any new or more severe significant impacts than those identified in the approved project EIR. No new information would require the preparation of a supplemental or subsequent EIR.

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4.7 NOISE AND VIBRATION

According to Appendix G of the CEQA Guidelines, a project would have a significant effect on the environment if the project would:

- NOI-1 Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
- NOI-2 Generation of excessive groundborne vibration or groundborne noise levels?
- NOI-3 For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

4.7.1 Summary of Impacts in the Approved Project EIR

Construction Noise and Vibration

In addition to Mitigation Measures NOI-1 and NOI-2, shown below, for pile driving and other construction activities, the approved project would incorporate the General Plan Noise Element's implementation program for construction noise because the approved project is adjacent to noise sensitive uses (Norwalk Library). As stated in the Noise Element, for projects adjacent to any property that is designated, developed, or occupied by noise-sensitive uses, the developer may be required to submit a construction noise mitigation plan to the City Engineer for review and approval prior to issuance of a grading or building permit. The plan must show how noise from construction would be mitigated through the use of such methods as time of operation, temporary noise attenuation fences, location of construction equipment, and use of current technology and noise suppression equipment.

The approved project EIR Mitigation Measures NOI-1 and NOI-2 are reproduced below.

- NOI-1 The Applicant will implement the following measures during pile driving:
- With approval of the project structural engineer, pile holes shall be predrilled to minimize the number of pile hammer blows necessary to seat the pile, where feasible.
 - Alternatives to impact hammers, such as oscillating or rotating pile installation systems, shall be used where feasible.
 - Pile drivers with the best available noise control technology, such as shrouding, shall be used. Pile driving noise control may be achieved by shrouding the pile hammer point of impact, placing resilient padding directly on top of the pile cap, and/or by reducing exhaust noise with a sound-absorbing muffler. The shrouding of pile-driving equipment would attenuate pile-driving noise levels by 10 dBA (FHWA 2016), resulting in mitigated construction noise levels of 77 dBA Leq or less.

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- NOI-2 In the event that demolition, grading, building construction, and pile driving is necessary within the screening distances for historical structures, construction vibration monitoring shall be conducted to document conditions at the Norwalk City Hall prior to, during, and after vibration-generating demolition, grading, building construction, and pile driving. The construction vibration monitoring shall be implemented by a historic architect meeting the Secretary of the Interior's Professional Qualification Standards to include the following tasks:
- Performance of a photo survey, elevation survey, and tile/crack monitoring survey for the City Hall. Surveys shall be performed prior to and in regular intervals during of all vibration-generating activities within the screening distances of the City Hall building (the FTA Historical Structures Screening Distance to 0.12 in/sec PPV).
 - Conduct a post-construction survey on the structure following the completion of vibration-generating activities and applicant to make appropriate repairs in accordance with the Secretary of the Interior's Standards where damage has occurred as a result of construction activities.

Transportation Noise

The approved project-related transportation noise increase would be up to 0.1 dBA CNEL and would not exceed the most stringent threshold of 1.5 dBA CNEL. Therefore, impacts were concluded to be less than significant. Cumulative traffic noise impacts for the approved project's traffic noise would not result in a permanent increase in ambient noise levels in the vicinity of the project in excess of established standards, and a less-than-significant impact would occur.

Airport Noise

The project site is not within an airport land use plan nor within two miles of public airport or public use airport. The nearest airport is Fullerton Municipal Airport in Fullerton, California, approximately 5.75 miles southeast of the project site. The project site is not within two miles of an airport. Therefore, airport noise would not expose people working or residing in the project area to excessive aircraft noise levels. No impact would occur.

Stationary Noise

Mechanical Equipment and Loading Activities

The approved project consists of mixed-use buildings which are anticipated to have heating, ventilation, and air conditioning (HVAC) units. For a conservative analysis, was assumed that HVAC equipment could be installed at the edge of the two proposed buildings facing Imperial Highway and Norwalk Boulevard. Typical HVAC noise levels are 72 dBA at a distance of 3 feet. The nearest sensitive receptors to the nearest proposed buildings are the Norwalk Library at approximately 115 feet east (across Avenida Manuel Salinas) of the project site, and single-family homes approximately 365 feet northeast (across Imperial Highway) from the project site. Noise levels would attenuate to 40 dBA or less at both sites. This would not exceed the presumed nighttime and daytime ambient noise levels of 45 and 55 dBA, respectively, by 5 dBA. This level would also be below the daytime measured ambient of 64 and 73 dBA. Therefore, the approved project's noise from stationary

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mechanical equipment would not result in a permanent increase in ambient noise levels in the vicinity of the project in excess of established standards, and noise impacts from the approved project's stationary mechanical equipment would be less than significant.

For the approved project, the ground floor of the proposed mixed-use buildings would include retail and commercial uses that could include loading and unloading activities from delivery trucks. It is also assumed that delivery trucks could be equipped with transport refrigeration units (TRUs), which are noise generators. For a conservative analysis, it was assumed loading activities could occur at the nearest edge of a proposed mixed-use building along Norwalk Boulevard and Avenida Manuel Salinas to the nearest sensitive receptors across Norwalk Boulevard (residential) and the Norwalk Library across Avenida Manuel Salinas. It was also assumed that no loading activities would occur during the nighttime hours between 10:00 pm and 7:00 am and that loading activities would be interior to the buildings.

Based on empirical noise measurements for loading and unloading activities from delivery trucks with attached TRUs, it indicates noise levels are typically 66 dBA Leq at a distance of 20 feet for one truck. It was assumed that two adjacent delivery trucks could be unloading at the same time. The analysis showed the attenuated noise levels at the nearest off-site residences approximately 175 feet to the west (across Norwalk Boulevard) and library receptors 115 feet to the east (across Manuel Salinas Avenue). The loading docks adjacent to Manuel Salinas Avenue would be within the eastern building, which would provide at least a 5 dBA reduction for noise impacts to the Norwalk Library. At these distances, noise levels would attenuate to 53 dBA Leq or less, which would not exceed the City's presumed daytime ambient noise levels of 55 dBA nor the measured ambient noise levels of 68 dBA and 64 dBA. Therefore, the approved project's loading activities would not result in a permanent increase in ambient noise levels in the vicinity of the project that would exceed established standards, and impacts from the approved project's loading activities would be less than significant.

Outdoor Spaces

For purposes of analyzing noise impacts, it was assumed that the approved project would have two main mixed-use buildings with a central, ground-floor publicly accessible open space. The ground floor of the mixed-use buildings would have commercial and retail uses and parking. Above the ground floor would be multistory residential units with residential outdoor space (potentially including a pool or outdoor amenities for residences and guests only). The ground level would also have publicly accessible open space that would be privately operated and maintained. Outdoor community events, such as the types that already occur on the project site could continue, and smaller-scale outdoor events and programming could also occur following project buildout. The operational noise associated with these uses is discussed below.

Private Residential Common Areas and Private Balconies/Patios

Based on the conceptual site plan for the approved project, both mixed-use buildings would have residential units above ground-floor commercial uses. Residential outdoor common areas and private patios could be located on the floors above the ground-floor commercial uses and could have amenities such as barbecues and seating for residents. The residential common areas would be semi-enclosed by the additional stories of residential units that form a U-shape around the common areas, which open toward the center of the project site.

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The primary noise source associated with the residential common open spaces would be conversational noise from people talking. A typical conversation between two people at a distance of three feet is 60 dBA. People would be spaced throughout the common spaces, and the conceptual building configuration would provide substantial acoustical shielding to the nearest off-site receptors. Therefore, the noise impacts from the residential use of outdoor common areas would not result in a permanent increase in ambient noise levels in the vicinity of the project that exceeds established standards, and residential noise from the use of common areas would be less than significant.

Residential units may also have balconies and patios; some residential balconies may face Avenida Manuel Salinas, Imperial Highway, and Norwalk Boulevard. These balconies would not be shielded by the building itself like the residential common areas. The primary noise source associated with balconies is typically conversation from residents. As mentioned above, a typical conversation between two people at a distance of three feet is 60 dBA. Based on the conceptual site plan, the nearest noise-sensitive receptors to the balconies are assumed to be approximately 110 feet to the east (Norwalk Library) and 200 feet to west (residences). At those distances noise levels would attenuate to approximately 28 dBA or less, which would be well below the existing ambient noise levels. Therefore, the use of balconies would not result in a permanent increase in ambient noise levels in the vicinity of the proposed project that would exceed established standards, and impacts would be less than significant.

Publicly Accessible Ground Level Spaces

The City Hall Lawn and/or the surface parking lot on the project site have also been utilized periodically for special events and activities sponsored by organizations and/or the City, and various regularly scheduled activities. The approved project's publicly accessible open space could continue to accommodate events and programming such as those that already occur on the project site. These events are assumed to continue on the project site in the future and are considered part of the operational noise baseline for the approved project. Therefore, the analysis evaluated operational noise impacts associated with new and additional events and gatherings as a result of implementation of the approved project. The frequency of events may increase in the future with the approved project; however, the types and size of future events would remain consistent with events that currently occur onsite.

Events and activities that currently occur on-site may continue in the future. These events are similar to the events that currently exist on-site. In addition, the approved project would provide activated and engaging open-air publicly accessible open space suitable for community gatherings, socializing, and outdoor dining. The primary resulting noise source from such events is conversational noise, which would not result in a permanent increase in ambient noise levels in the vicinity of the project in excess of established standards. While some amplified noise could occur, it was expected to be similar to what is associated with other events that already occur on the project site. Additionally, the approved project's conceptual building siting along Norwalk Boulevard, Imperial Highway and Avenida Manuel Salinas with publicly accessible open space through the center of the project site would provide substantial acoustical shielding that does not currently exist, so that noise generated from within the project site does not reach off-site sensitive receptors (the closest being Norwalk Library approximately 100 feet to the east and the nearest residential receptor approximately 116 feet to the west). This conceptual layout of multi-story development near the edges of the public right of ways would shield noise from future new events associated with the approved project and ongoing existing events.

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Additional shielding would be provided by the Norwalk City Hall (to remain) and existing commercial/retail buildings to the north across Imperial Highway. Therefore, the operational noise from activated outdoor uses would not result in a permanent increase in ambient noise levels in the vicinity of the approved project in excess of established standards, and impacts would be less than significant.

4.7.2 Analysis of the Proposed Project

Unlike the approved project which assumed typical onsite construction, the proposed project includes state-of-the-art modular buildings that would be assembled and installed onsite. This construction method reduces scope of construction activity onsite, eliminates the need for pile driving, and the number of construction workers and personnel needed onsite. Based on this construction process, it is anticipated that construction noise from onsite construction activity would be reduced from construction noise presented in the EIR for the approved project.

The approved project would maintain a minimum of a 50-foot setback from City Hall, an eligible historic resource. In comparison, the proposed project would have between 51 to 96-foot setbacks from City Hall, which represents a 1 to 46-foot increase compared to the approved project. Further, the proposed project would no longer require pile driving. As such, the proposed project's vibration levels at City Hall would be lower than the approved project. Mitigation Measure NOI-1 no longer applies to the proposed project. Like the approved project, the proposed project would implement Mitigation Measure NOI-2 (see above), and would also incorporate the Noise Element's implementation program for construction noise because the proposed project is adjacent to noise sensitive uses (Norwalk Library). As stated in the Noise Element, for projects adjacent to any property that is designated, developed, or occupied by noise-sensitive uses, the developer may be required to submit a construction noise mitigation plan to the City Engineer for review and approval prior to issuance of a grading or building permit. The plan must show how noise from construction would be mitigated through the use of such methods as time of operation, temporary noise attenuation fences, location of construction equipment, and use of current technology and noise suppression equipment. As with the proposed project, implementation of the mitigation measures would reduce construction noise and vibration impacts to a less than significant level. No new information would require preparation of a supplemental or subsequent EIR. The proposed project would not result in any new or more severe significant impacts than those identified in the approved project EIR.

As presented in the Transportation Impact Analysis for the proposed project (see Appendix B to this Addendum), the proposed project would generate a total of 5,051 daily vehicle trips, which is a reduction of 1,141 daily trips from the 6,192 daily trips projected for the approved project and analyzed in the certified EIR. When these vehicle trips for the proposed project are distributed to the adjacent roadway segments similar to how they were distributed to the routes evaluated for the approved project, vehicle trips along each segment of the roads would be proportionally less than previously analyzed, therefore resulting in slightly lower traffic noise levels compared to those shown in the certified EIR for the approved project. Additionally, an increase in 3dBA is the minimum perceptible change in noise, a doubling of traffic volume would result in a 3dBA increase in traffic noise; however, the proposed project would result in a reduction in 1,141 daily trips projected for the approved project. Therefore, the proposed project would not result in a doubling of traffic, and the proposed project's traffic generated noise levels would be less than 3dBA and less than the noise levels evaluated in the

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certified EIR. No additional impacts would occur, and it would remain to be a less-than-significant impact. No new information would require preparation of a supplemental or subsequent EIR. The proposed project would not result in any new or more severe significant impacts than those identified in the approved project EIR.

Similar to the approved project, the proposed project would construct mixed-use buildings which are anticipated to have heating, ventilation, and air conditioning (HVAC) units. However, no substantial changes would occur between the approved project and the proposed project for the building footage from the project boundary, and the distance to the nearest adjacent sensitive receptors. Therefore, the proposed project's noise from stationary mechanical equipment would not result in a permanent increase in ambient noise levels in the vicinity of the project in excess of established standards, and noise impacts from the proposed project's stationary mechanical equipment would remain to be less than significant. No new information would require preparation of a supplemental or subsequent EIR. The proposed project would not result in any new or more severe significant impacts than those identified in the approved project EIR.

Also similar to the approved project, the ground floor of the proposed mixed-use buildings would include retail and commercial uses that could include loading and unloading activities from delivery trucks. It is also assumed that delivery trucks could be equipped with transport refrigeration units (TRUs), which are noise generators. Similar to the approved project, no loading activities would occur during the nighttime hours between 10:00 pm and 7:00 am. Commercial loading/delivery activities from Avenida Manuel Salinas would occur in the loading dock within the proposed parking garage similar to the approved project. The primary loading zones for the proposed project would be on the northwest side of the project site, adjacent to Building 5. This area would be shielded by the existing City Hall building from the residences located on the west side of Norwalk Boulevard, southwest of the proposed Building 5. The land uses directly to the west of Building 5 and Norwalk Boulevard are commercial uses (not considered sensitive receptors). The distance from the loading area of Building 5 to the residential uses to the southwest is more than 300 feet, and traffic noise from Norwalk Boulevard dominates the ambient noise in that area. With the distance attenuation of more than 15 dBA between the loading area with Building 5 and residences on the west side of Norwalk Boulevard, noise associated with this loading area would not exceed the ambient noise in the residential area that is dominated by traffic noise. Since the proposed project would not expose off-site sensitive receptors to loading docks noise that would exceed the City's presumed daytime ambient noise levels of 55 dBA nor the measured ambient noise levels of 68 dBA and 64 dBA, the proposed project's loading activities would not result in a permanent increase in ambient noise levels in the vicinity of the project that would exceed established standards, and impacts from the proposed project's loading activities would remain to be less than significant.

Similar to the approved project, the proposed project would have ground floor commercial and retail uses and parking. Above the ground floor would be multistory residential units with residential outdoor space (potentially including a pool or outdoor amenities for residences and guests only). The ground level would also have publicly accessible open space that would be privately operated and maintained. Outdoor community events, such as the types that already occur on the project site could continue, and smaller-scale outdoor events and programming could also occur following project buildout. The operational noise associated with these uses is discussed below.

Building 1 of the proposed project would have residential units above ground-floor commercial uses. Residential outdoor common areas and private patios could be located on the floors above the ground-floor

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commercial uses and could have amenities such as barbeques and seating for residents. The residential common areas would be semi-enclosed by the additional stories of residential units that form a U-shape around the common areas, which open toward the center of the project site.

The primary noise source associated with the residential common open spaces would be conversational noise from people talking. A typical conversation between two people at a distance of three feet is 60 dBA. People would be spaced throughout the common spaces, and the conceptual building configuration would provide substantial acoustical shielding to the nearest off-site receptors. Therefore, the noise impacts from the residential use of outdoor common areas would not result in a permanent increase in ambient noise levels in the vicinity of the project that exceeds established standards, and residential noise from the use of common areas would remain to be less than significant. No new information would require preparation of a supplemental or subsequent EIR. The proposed project would not result in any new or more severe significant impacts than those identified in the approved project EIR.

Similar to the approved project, residential units under the proposed project may also have balconies and patios; some residential balconies may face Avenida Manuel Salinas, Imperial Highway, and Norwalk Boulevard. These balconies would not be shielded by the building itself like the residential common areas. The primary noise source associated with balconies is typically conversation from residents. As mentioned above, a typical conversation between two people at a distance of three feet is 60 dBA. Based on the proposed project's site plan the nearest noise-sensitive receptors to the balconies would be approximately 110 feet to the east (Norwalk Library) and 200 feet to west (residences). At those distances noise levels would attenuate to approximately 28 dBA or less, which would be well below the existing ambient noise levels. Therefore, the use of balconies would not result in a permanent increase in ambient noise levels in the vicinity of the proposed project that would exceed established standards, and impacts would remain to be less than significant. No new information would require preparation of a supplemental or subsequent EIR. The proposed project would not result in any new or more severe significant impacts than those identified in the approved project EIR.

The City Hall Lawn and/or the surface parking lot on the project site have also been utilized periodically for special events and activities sponsored by organizations and/or the City, and various regularly scheduled activities. As with the approved project, the proposed project's publicly accessible open space could continue to accommodate events and programming such as those that already occur on the project site. Therefore, the certified EIR analysis evaluated operational noise impacts associated with new and additional events and gatherings as a result of implementation of the proposed project and there would be no changes to that evaluation.

Noise levels associated with the events that are anticipated in connection with the proposed project are similar to the events that currently exist on-site. In addition, the proposed project would provide activated and engaging open-air publicly accessible open space suitable for community gatherings, socializing, and outdoor dining. The primary resulting noise source from such events is conversational noise, which would not result in a permanent increase in ambient noise levels in the vicinity of the project in excess of established standards. While some amplified noise could occur, it is expected to be similar to what is associated with other events that already occur on the project site. Additionally, the proposed project's building siting along Norwalk Boulevard, Imperial Highway, and Avenida Manuel Salinas with publicly accessible open space through the center of the project site would provide substantial acoustical shielding that does not currently exist, so that noise generated from within

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the project site does not reach off-site sensitive receptors (the closest being Norwalk Library approximately 100 feet to the east and the nearest residential receptor approximately 116 feet to the west). This layout of multi-story development near the edges of the public right of ways would shield noise from future new events associated with the proposed project and ongoing existing events. Additional shielding would be provided by the Norwalk City Hall (to remain) and existing commercial/retail buildings to the north across Imperial Highway. Therefore, the operational noise from activated outdoor uses would not result in a permanent increase in ambient noise levels in the vicinity of the proposed project in excess of established standards, and impacts would remain to be less than significant and similar to those of the approved project. No new information would require preparation of a supplemental or subsequent EIR. The proposed project would not result in any new or more severe significant impacts than those identified in the approved project EIR.

Similar to the approved project, the proposed project site is not within an airport land use plan nor within two miles of public airport or public use airport. The nearest airport is Fullerton Municipal Airport in Fullerton, California, approximately 5.75 miles southeast of the project site. The proposed project site is not within two miles of an airport. Therefore, airport noise would not expose people working or residing in the project area to excessive aircraft noise levels. No impact would occur.

4.8 POPULATION AND HOUSING

According to Appendix G of the CEQA Guidelines, a project would have a significant effect on the environment if the project would:

- POP-1 Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?
- POP-2 Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

4.8.1 Summary of Impacts in the Approved Project EIR

Unplanned Growth

Construction of the approved project would bring workers to the project site, starting with site preparation through the complete buildout of the proposed project. General construction labor is expected to be available from the local and regional labor pool. Given the short-term nature of construction work, the proposed project's construction would not result in a long-term increase in employment and is therefore not expected to attract new residents to the area. The construction of the approved project would not directly or indirectly result in unplanned growth of the project site, and impacts would be less than significant.

Operation of the approved project would include up to 350 residential units. A minimum of 15 percent (53 units assuming the full 350 units were constructed) would be reserved as affordable dwelling units. Assuming

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an average of 3.61 residents per dwelling unit¹, the approved project would generate approximately 1,264 new residents. As of 2020, the projected number of dwelling units in Norwalk by 2045 has been exceeded and the approved project would add to this exceedance. However, the approved project's dwelling units are well within the projected growth for Los Angeles County and within the projected population growth for both Norwalk and Los Angeles County. Additionally, the approved project would contribute to the City's 5,034-unit RHNA number. Therefore, the population generated by the approved project would not result in unplanned population growth in the project area, and impacts would be less than significant.

The approved project includes 110,000 square feet of new commercial space, including a restaurant, retail, and a supermarket. The approved project would generate 441 employment opportunities within the City. The projected employment generation is well within the projected employee growth in the City of Norwalk and the County of Los Angeles. Therefore, the proposed project would not result in indirect unplanned population growth in the project area by creating employment opportunities, and impacts would be less than significant.

Displace People and Housing

No dwelling units or residential uses currently occupy the project site. Thus, the approved project would not displace housing or people. Therefore, no impact would occur.

4.8.2 Analysis of the Proposed Project

The proposed project would include the development of 94,398 square feet of new commercial space and 374 residential units, consisting of 56 affordable units and 318 market-rate units. The proposed project would utilize the State Density Bonus Law to increase the residential density to 374 units from the maximum of 350 units permitted under the Specific Plan, and thus would directly generate population growth compared to the approved project.

Construction of the proposed project would remain short-term in nature. Additionally, general construction labor is expected to be available from the local and regional labor pool. Similar to the approved project, construction of the proposed project would not directly or indirectly result in unplanned growth, and impacts would be less than significant. The proposed project would not result in any new or more severe significant impacts than those identified in the approved project EIR. No new information would require the preparation of a supplemental or subsequent EIR.

The proposed project would develop 374 residential units. Assuming an average of 3.61 residents per dwelling unit¹, the proposed project would generate 1,350 new residents. As seen below in Table 3, *Proposed Project's population and Housing Contribution*, the proposed project would generate an increase in population of 86 and an increase of 24 dwelling units compared to the approved project.

¹ This rate is based on Norwalk's 2020 population (102,773) and the total number of dwelling units in the city (28,455) (U.S. Census 2022).

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Table 3 Proposed Project's Population and Housing Contribution

	Current (2020)	Future (2045)	Approved Project	Proposed Project	Net Change	Current + Project	Remaining to Future (2045)
City of Norwalk							
Population	102,773	107,000	1,264	1,350	86	104,123	2,877
Housing	28,455	27,914 ^a	350	374	24	28,829	(915)
Los Angeles County							
Population	10,014,009	11,673,600	1,264	1350	86	10,015,359	1,658,241
Housing	3,591,981	4,326,786 ^b	350	374	24	3,592,355	734,431

Sources: Census 2020a; SCAG 2020.

Notes:

^a SCAG projects 27,300 households in Norwalk by 2045, including occupied dwelling units. The city's vacancy rate (2.2 percent) from the 2020 Census was applied to households to estimate dwelling units in Norwalk in 2045.

^b SCAG projects 4,119,100 households in Los Angeles County by 2045, which only includes occupied dwelling units. The county's vacancy rate (4.8 percent) from the 2020 Census was applied to households to estimate the county's dwelling units in 2045.

Similar to the approved project, the proposed project's population growth is well within the projected population growth for both Norwalk and Los Angeles County. The projected number of dwelling units in Norwalk by 2045 has been exceeded and the proposed project would add to this exceedance. The proposed project's dwelling units is well within the projected housing growth for Los Angeles County. Additionally, the proposed project would contribute 24 additional units to the City's 5,034-unit RHNA number compared to the approved project. Therefore, the population generated by the proposed project would not result in unplanned population growth in the project area, and impacts would be less than significant. The proposed project would not result in any new or more severe significant impacts than those identified in the approved project EIR.

The proposed project includes 94,398 square feet of new commercial space, which is a reduction of commercial square footage compared to the 110,000 square feet assumed for the approved project. However, due to the square footage and type of commercial uses included in the proposed project, the proposed project's employees are anticipated to increase as compared to the approved project (see Table 4, *Proposed Project Employment Generation*). The proposed project would generate 503 employment opportunities within the City, which is an increase of 62 additional employment opportunities compared to the approved project. However, the proposed project's projected employment generation is well within the projected employee growth in the City of Norwalk and County of Los Angeles. Therefore, the proposed project would not result in indirect unplanned population growth in the project area by creating employment opportunities, and impacts would be less than significant. The proposed project would not result in any new or more severe significant impacts than those identified in the approved project EIR. No new information would require the preparation of a supplemental or subsequent EIR.

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Table 4 Proposed Project Employee Generation

	Approved Project Square Footage	Proposed Project Square Footage	Generation Rate	Approved Project Generated Employees	Proposed Project Generated Employees	Net change
Fine Dining Restaurant	17,500	32,000	134 of/employee	131 employees	239 employees	108 employees
High- Turnover Sit-Down Restaurant	17,500	15,000	100 of /employee	175 employees	150 employees	(25 employees)
Retail ^a	35,000	41,398	383 sf /employee	92 employees	108 employees	16 employees
Supermarket	40,000	6,000	938 sf/employee	43 employees	6 employees	(37 employees)
Total	110,000	94,398	--	441 employees	503 employees	62 employees

Source: USGBC 2008.

Notes: sf = square feet

^a The generation rate for "Community Retail" was used for Retail to present a conservative estimate and also includes health and wellness uses included in the project. Employees rounded to the nearest whole number.

^b The generated amounts within parentheses indicate a decrease

As with the approved project, no dwelling units or residential uses currently occupy the project site. Thus, the proposed project would not displace housing or people. Therefore, no impact would occur. The proposed project would not result in any new or more severe significant impacts than those identified in the approved project EIR.

4.9 TRANSPORTATION

According to Appendix G of the CEQA Guidelines, a project would have a significant effect on the environment if the project would:

- T-1 Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?
- T-2 Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?
- T-3 Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- T-4 Result in inadequate emergency access?

4.9.1 Summary of Impacts in the Approved Project EIR

Conflicting with a Program, Plan, Ordinance, or Policy

The goals, objectives, and policies applicable to the approved project relate to local thoroughfares and transportation routes, the transportation system, public transportation, bicycle and pedestrian facilities, and

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parking. The approved project would be consistent with the City's General Plan Circulation Element, Norwalk Municipal Code, SCAG Connect SoCal, and Norwalk Bicycle Master Plan.

Vehicle Miles Traveled

The approved project would have a total residential population of 1,264 residents and generate 16,001 daily residential VMT. The approved project would generate daily residential VMT per capita of 12.7, exceeding the residential VMT per capita threshold of 10.6. Therefore, the approved project would result in a potentially significant residential VMT impact. With implantation of Mitigation Measure TRA-1, impacts would be reduced to less than significant.

Additionally, the approved project would construct approximately 110,000 sf of commercial uses which includes approximately 35,000 sf of retail uses, a 40,000sf supermarket, and approximately 35,000 sf of high-turnover and fine dining restaurant uses. None of the individual commercial tenants would exceed the 50,000 sf threshold. The proposed project would include retail into the urban fabric improving retail destination proximity and would allow residential uses access to the retail uses, the civic center, and the entertainment uses, thus shortening trips and reducing VMT. The commercial uses of the approved project would not be considered regional-serving and would instead serve the local community. However, because the combined commercial uses of 110,000 sf would exceed 50,000 sf, an additional review of total VMT was conducted. Based on the VMT methodology outlined in Section 3.1.4.2 of the County TIA Guidelines, the SCAG 2016 RTP/SCS TDF model determined the County-wide VMT would remain the same when comparing the project both with and without the proposed 110,000 sf of retail uses. Thus, the proposed commercial uses would not result in a significant retail VMT impact, and a less than significant impact would occur.

Geometric Design Features

The construction of the approved project may require temporary lane closures for utility hookups and to be used as construction staging areas. These lane closures, if needed, would not create sharp curves or dangerous intersections and would not represent incompatible uses. Thus, a less than significant impact would occur. In addition, the proposed project would incorporate Mitigation Measure TRA-2, which would require the preparation and implementation of a Construction Management Plan.

Additionally, the approved project would allow for the operation of a mixed-use project that would include multifamily residential and various commercial uses, such as grocery store, restaurant, and retail, typical of urban areas and does not represent incompatible uses. Thus, a less than significant impact would occur.

Emergency Access

All construction activities would be primarily contained within the project site boundaries; however, it is expected that construction fences may temporarily encroach into the public right-of-way (e.g., sidewalks and roadways). Project construction would in truck traffic (haul trucks, delivery trucks, cement trucks) and worker traffic to and from the project site on a daily basis. Temporary traffic controls would be needed to direct traffic and/or pedestrians safely around any closures; and would be coordinated with the City and applicable emergency response agencies, including the Los Angeles County Fire Department (LACoFD) and Los Angeles County Sheriff Department (LASD), to ensure adequate access. As such the approved project could result in

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inadequate emergency access during construction, and a potentially significant impact would occur. With implementation of Mitigation Measure TRA-2 impacts would be reduced to less than significant.

The Los Angeles County Public Works Department identifies Imperial Highway and Norwalk Boulevard as disaster routes that border the project site to the north and west, respectively. Imperial Highway provides access out of the City of Norwalk eastbound and allows access to I-5, which is also identified as an evacuation route in both north and south directions. Norwalk Boulevard provides access out of Norwalk northbound to I-5 and would continue to do so for the approved project.

All project driveways and circulation aisles would be designed and maintained to provide adequate access for emergency vehicles to the project site and the surrounding area. The proposed project is required to meet NMC Chapter 15.08 requirements for adequate emergency access and comply with Los Angeles County Fire Department access requirements. Therefore, impacts would be less than significant.

The approved project EIR Mitigation Measures TRA-1 and TRA-2 are reproduced below.

TRA-1 A comprehensive transportation demand management (TDM) program shall be implemented as part of the proposed project's mitigation program aimed at reducing vehicle miles traveled (VMT) and vehicular trips to the project site and the project area through transportation services, education programs, and incentive programs intended to promote non-auto travel and the reduction of single occupancy vehicle trips. This mitigation measure identifies a menu of available TDM strategies that the proposed project could implement to result in a quantitative reduction in VMT and vehicular trips.

The proposed project would be subject to annual monitoring to provide a reasonable sample period of travel characteristics, including but not limited to the percentage of modes of travel to and from the project site, parking hour utilization, and/or peak hour trips, to ensure that the consistency with the TDM target. The monitoring program would continue until the project has shown that achievement of the target has been met for five consecutive years following full operations of the proposed project. Should the proposed project fail to meet the target after a given monitoring year, the proposed project would be required to review and implement enhancements to the components of the TDM Program, subject to review and monitoring by the City, to increase the effectiveness of TDM in meeting the VMT and trip reduction goals the following year.

The proposed project's TDM program shall include, but is not limited to, the following measures, which are further described below:

- **Educational Programs/On-Site TDM Coordinator.** A key component of a successful TDM program is to make residents, employees, and visitors at the project site aware of the various programs offered. To this end, a TDM coordinator would reach out to residents, employers, and employees directly to promote the benefits of TDM.
- **Transportation Information Center/Kiosks.** In compliance with the Norwalk Municipal Code Chapter 17.03.080, Transportation Demand Management, the proposed

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project would provide a Transportation Information Center, where project residents, employees and visitors can obtain information regarding commute programs, and individuals can obtain real-time information for planning travel without using an automobile. A Transportation Information Center would be centrally-located and would provide information about transit schedules, commute planning, rideshare, and bicycle and pedestrian plans.

- **Project Design Features to Promote Bicycling and Walking.** The proposed project would incorporate features for bicyclists and pedestrians, such as exclusive access points, upgraded pedestrian facilities, and bicycle parking. Additionally, the project site would be designed to be a friendly and convenient environment for pedestrians through publicly accessible open space and walkways.
- **Bikeway Improvements.** The proposed project would contribute funding toward the implementation of bicycle facility improvements within the project site area.
- **Promotion and support of carpools and rideshare.** The TDM program would provide services to match residents and employees to establish carpools and vanpools. Carpools/vanpools provide the potential for residents to go to work relaxed and/or work during the commute and reduce the number of vehicle trips to and from the project site.
- **Incentives for using alternative travel modes.** The TDM program would incorporate various incentives for use of its programs. In accordance with the City's TDM Ordinance, carpool and vanpool users could be offered preferential load/unload areas or convenient designated parking spaces. Employees who choose not to drive their own cars and park them at the project site could receive a "parking cash-out" subsidy. For example, discounted transit passes could be offered to eligible residents and employees. Project employees who purchase transit passes from the project's Transportation Coordinator would automatically be registered in a Guaranteed Ride Home Program by which, upon request to the Transportation Coordinator, the employee will be given a voucher to travel home on transit or Uber/Lyft (or similar shared ride service) in case of illness or emergency. Each employee would receive a limited number of Guaranteed Ride Home passes per year.
- **Parking incentives.** The proposed project would provide a reduced parking supply as compared to the City's Municipal Code requirements. Limiting the amount of parking available would limit the convenience of driving and disincentivize driving as a preferred mode of travel, and thus would decrease VMT. Unbundled parking is a program wherein parking spaces are rented or sold separately from the building space, which allows for a separate charge for parking and the flexibility to vary the number of spaces rented. Unbundling parking is an essential first step toward getting people to understand the economic cost of parking. Without unbundled parking, tenants often assume that parking is free.

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- **Mobility hub support.** The proposed project would support existing and/or future efforts by the City to provide first-mile and last-mile service for transit users. Mobility hubs, typically located at or near public transit centers, would provide amenities such as, but not limited to, bicycle parking and transit information. The proposed project could provide space for similar amenities at the project site to complement future mobility hubs in the surrounding entertainment district and civic center areas.
- **Community-wide transportation management organization.** The project area is a candidate for alternative modes of transportation, including convenient walking and bicycling, carpooling and vanpooling, use of public transit, short-term automobile rentals, etc., due to the proximity of existing employment, residential, and commercial uses, as well as the Metrolink Norwalk Station, the Metro C (Green) Line Norwalk Station, and numerous bus stops. At present, there is no organization to administer these options to the public. A Communitywide Transportation Management Organization would help promote these services to a community by providing information about available public transportation options and ridesharing services. Many of the strategies described above could be enhanced through participation in the Communitywide Transportation Management Organization.

TRA-2

Construction Management Plan

A detailed Construction Management Plan, including haul routes and a staging plan, shall be prepared and submitted to the City of Norwalk, Los Angeles County Fire Departments, and Los Angeles County Sheriff Department for review and approval, prior to commencing construction. The Construction Management Plan shall formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The Construction Management Plan shall be based on the nature and timing of the specific construction activities and other development projects in the vicinity of the project site, and shall include, but not be limited to, the following elements, as appropriate:

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation
- Prohibition of construction worker or equipment parking on adjacent streets
- Prohibition of haul truck staging on any streets adjacent to the Project, unless specifically approved as a condition of an approved haul route
- Scheduling of construction related traffic restricted to off-peak hours and in consideration of any other traffic-causing events or overlapping nearby construction activities, to the extent feasible.
- Containment of construction activity within the Project Site boundaries except where access and/or right of way improvements may be necessary

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- Implementation of safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers
- Scheduling of construction-related deliveries, haul trips, etc., to occur outside the commuter peak hours to the extent feasible
- Provision of flagging or other directional signage to direct traffic as needed.
- Spacing of trucks so as to discourage a convoy effect
- Sufficient dampening of the construction area to control dust caused by grading and hauling and reasonable control at all times of dust caused by wind
- Maintenance of a log, available on the job site at all times, documenting the dates of hauling and the number of trips (i.e., trucks) per day
- Identification of a construction manager and provision of a telephone number for any inquiries or complaints from residents regarding construction activities posted at the site readily visible to any interested party during site preparation, grading, and construction

4.9.2 Analysis of the Proposed Project

The analysis in section is based in part on the Transportation Impact Analysis prepared by Gibson Transportation Consulting (dated August 20, 2024) and contained in Appendix B.

As presented in the Transportation Memorandum for the proposed project, the proposed project would generate a total of 5,051 daily vehicle trips, which is a reduction of 1,141 daily trips from the previously projected 6,192 daily trips for the approved project. The proposed project is a mixed-use project similar to the approved project. It would be designed to support the applicable programs, plans, ordinances, or policies identified in the certified EIR related to the circulation system, including transit, roadways, bicycles, and pedestrian facilities. The proposed project would not preclude the City from implementing future improvements to serve the long-term mobility needs of the City. Similar to the approved project, operation of the proposed project would generate vehicle trips and provide accessibility to the public and location near transit services which would reduce VMT. Additionally, the proposed project would implement Mitigation Measure TRA-1, which includes the development of a TDM consistent with NMC Title 17, Chapter 17.03.080. Further, the proposed project would follow the certified EIR in the implementation of the City's Economic Development Opportunities Plan. Thus, the proposed project would not conflict with a program, plan, ordinance or policy related to circulation and would result in a less than significant impact. The proposed project would not result in any new or more severe significant impacts than those identified in the approved project EIR. No new information would require the preparation of a supplemental or subsequent EIR. The proposed project would not result in any new or more severe significant impacts than those identified in the approved project EIR.

The City recognizes the efficiency metrics of *Los Angeles County Public Works Transportation Impact Analysis Guidelines* (County TIA Guidelines) to determine VMT impact. The proposed project VMT analysis is detailed in Table 5, *Estimated VMT Associated with Proposed Project*, which is based on the daily trip generation estimates from *Trip Generation Manual, 11th Edition*, and average trip length outputs from *California Emissions Estimator*

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Model Version 2020.4.0 (California Air Pollution Control Officers Association, 2022), consistent with the methodology in the Draft EIR.

The proposed project would develop 374 units and have a total residential population of 1,350 (as discussed in Section 4.7.2), an increase in units and residential population compared to the approved project. As a result, the proposed project would generate a total of 17,099 total daily residential VMT, an increase of 1,098 total daily residential VMT compared to the approved project.

Table 5 Estimated VMT Associated with Proposed Project

Land Use	Size	Daily Trip Rate ¹	Average Trip Length ²	Prior to Mitigation		With Mitigation (20% TDM)	
				Total Daily Trips	Total Daily VMT	Total Daily Trips	Total Daily VMT
Multi-Family Residential	374 du	4.54	10.6	1,698	17,999		
Transit/Walk-In Reduction	5%			(85)	(900)		
Residential with Reductions				1,613	17,099	1,290	13,674
Retail	41,398 sf	67.52	9.5	2,795	26,553		
Mixed-Use/Internal Capture	20%			(559)	(5,311)		
Transit/Walk-In	5%			(112)	(1,062)		
Retail with Reductions³				2,124	20,180	1,699	16,141
Supermarket	6,000 sf	93.84	8.6	563	4,842		
Mixed-Use/Internal Capture	20%			(113)	(968)		
Transit/Walk-In	5%			(23)	(194)		
Supermarket with Reductions³				427	3,680	342	2,941
Fine Dining Restaurant	32,000 sf	83.84	9.1	2,683	24,415		
Mixed-Use/Internal Capture	20%			(537)	(4,883)		
Transit/Walk-In	5%			(107)	(977)		
Fine Dining Restaurant with Reductions³				2,039	18,555	1,631	14,842
High-Turnover Sit-Down Restaurant	15,00 sf	107.20	8.8	1,608	14,150		
Mixed-Use/Internal Capture	20%			(322)	(2,830)		
Transit/Walk-In	5%			(64)	(566)		
High-Turnover Sit-Down Restaurant with Reductions³				1,222	10,754	978	8,606
Total Project				9,347	87,959		
Total Net Project with Trip Reductions				7,425	70,268	5,940	56,204

Source: Gibson 2024

Notes

[1] Daily trip rates based on Trip Generation Manual, 11th Edition (ITE, 2021).

[2] Average vehicle trip lengths based on outputs from the California Emissions Estimator Model Version 2020.4.0. (CAPCOA, 2022).

[3] The VMT analysis is based on the total trips generated to the Project Site, therefore, no pass-by reductions are applied.

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The residential VMT impact threshold is based on a per capita efficiency metric. Therefore, although the proposed project would increase the overall number of residential units, the residential VMT per capita would be the same as the approved project at 12.7 VMT per capita. As seen in Table 6, *Proposed Project VMT With and Without Mitigation*, the proposed project would also result in a potentially significant residential VMT impact. Therefore, similar to the approved project implementation of Mitigation Measure TRA-1, incorporation of the TDM program would result in the proposed project's residential VMT per capita to be reduced to a less than significant level. The proposed project would not result in any new or more severe significant impacts than those identified in the approved project EIR. No new information would require the preparation of a supplemental or subsequent EIR.

Table 6 Proposed Project VMT With and Without Mitigation

Project Information		
Project Land Uses		
	Housing Multi-Family	374 du
	Retail Shopping Center	41,398 sf
	Retail Supermarket	6,000 sf
	Retail Fine Dining Restaurant	32,000 sf
	Retail High-Turnover Restaurant	15,000 sf
	Total Population	1,350
	Total Employees	503
Los Angeles County Baseline Area		South County
	Residential VMT Impact Threshold	10.6
	Work VMT Impact Threshold	15.3
VMT Analysis	Prior to TDM	With TDM Program (Mitigation Measure TRA-1)
Total Daily Residential Trips	1,613	1,290
Total Daily Residential VMT	17,099	13,678
Household VMT per Capita	12.7	10.1
Significant Impact?	Yes	No

Source: Gibson 2024

Additionally, none of the individual commercial uses would exceed the 50,000-square foot threshold, see Table 1. The commercial uses would provide retail, grocery and restaurant opportunities within walking distance of the proposed project's residential uses, as well as the existing civic center, entertainment, and residential uses in the surrounding area. As such, as stated in the *Technical Advisory on Evaluating Transportation Impacts in CEQA*, adding retail opportunities, including supermarket and restaurant uses, into the urban fabric improves retail destination proximity and therefore shortens trips and reduces VMT (Governor's Office of Planning and Research 2018). Thus, the commercial uses of the proposed project would not be considered regional-serving and would instead serve the local community. Therefore, consistent with the approved project, the commercial uses of the proposed project would not result in a significant retail VMT, and a less than significant impact would occur. No new information would require the preparation of a supplemental or subsequent EIR. Nevertheless, the proposed project would implement a comprehensive TDM program that would reduce single occupancy vehicle trips and promote non-auto travel modes accessibility (see Mitigation Measure TRA-1). The

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proposed project would not result in any new or more severe significant impacts than those identified in the approved project EIR. No new information would require the preparation of a supplemental or subsequent EIR.

Access to the residential parking garage within the new buildings would continue to be provided via a full access driveway along Avenida Manuel Salinas, and access to the existing parking garage would continue to be provided via Avenida Manuel Salinas and Civic Center Drive.

Primary access for commercial loading/delivery activities would be relocated to the west side of the project site to a commercial truck loading dock and would be accessible via the new northernmost driveway along Norwalk Boulevard. In addition, access to the internal roundabout (which would also serve as a fire lane), the commercial loading/delivery zone, and parking along City Hall would be accessible via three new driveways along Norwalk Boulevard. Commercial loading/delivery activities from Avenida Manuel Salinas would occur in the loading dock within the proposed parking garage similar to the approved project. The overall trip distribution to and from the project site along the adjacent roadways would be consistent with the approved project.

Furthermore, the proposed project would generate a net reduction in trips as compared to the approved project. Similar to the approved project, parking for the proposed project would be provided through a mix of new on-site parking and the use of the existing parking structure. The proposed project would implement Mitigation Measure TRA-1 which includes parking incentives, incentives for using alternative travel modes, and support of carpool and ridesharing to reduce the reliance on single occupancy vehicle travel, which would result in a reduction in parking demand patterns. Therefore, the site access and circulation plan and the parking supply associated with the proposed project would not generate any new or more severe circulation impacts as compared to the approved project.

Similar to the approved project, the proposed project driveways would be designed in accordance with City standards. The driveways would be located perpendicular to the adjacent roadways, and there would be no slopes, curves, landscaping, or other barriers that would impede visibility. In addition, the driveways would be placed to provide appropriate pedestrian refuge areas between the driveways. Due to the existing raised median, the new driveways along Norwalk Boulevard would be restricted to right-turn only ingress and egress maneuvers. The driveways along Norwalk Boulevard and the short-term parking spaces along Avenida Manuel Salinas would be placed to maximize the distance from the adjacent signalized intersections to reduce potential vehicle conflicts. Queuing areas would also be provided at the driveways internal to the project site to limit any potential spillover into the public streets. The truck loading areas would also be designed to accommodate all turning maneuvers on-site without obstructing vehicle circulation or parking areas and would not require reverse maneuvers to or from the public right of way. Furthermore, the truck loading/delivery activities would occur in areas separate from passenger vehicle circulation, as well as bicycle and pedestrian access point. The proposed project would incorporate pedestrian and bicycle circulation throughout the project site to promote interactive use of the commercial uses and publicly accessible open spaces. Therefore, the vehicular access and internal circulation plan for the project would be designed to minimize vehicular conflicts, and safety impacts to the abutting street system are not anticipated. Thus, consistent with the approved project, the operation of the proposed project would result in a less than significant geometric design hazards impact. The proposed project would not result in any new or more severe significant impacts than those identified in the approved project EIR. No new information would require the preparation of a supplemental or subsequent EIR.

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Furthermore, construction of the proposed project's impacts on emergency access would be similar to the approved project, since construction fences may temporarily encroach into the public right-of-way (e.g., sidewalks and roadways); truck traffic (haul trucks, delivery trucks, cement trucks) and worker traffic; and the implementation of temporary traffic control around any closures. However, the proposed project includes a state-of-the-art modular construction process that reduces scope of construction needs onsite and the number of construction workers and personnel needed onsite. Further, the proposed project would implement Mitigation Measure TRA-2, which requires the preparation of a construction management plan. Thus, the proposed project would result in less impacts to emergency access due to the reduced construction schedule and construction needs than previously analyzed within the approved project.

The proposed project would coordinate with the City and applicable emergency response agencies to ensure adequate access. All driveways and circulation aisles of the proposed project would be designed and/or maintained to provide adequate access for emergency vehicles to the project site and the surrounding area. The driveways would also provide adequate queuing areas to minimize the potential for queue spillover into the public right of way that would impact emergency access. Therefore, consistent with the approved project, impacts to emergency access of the proposed project would be less than significant. Thus, the proposed project would not result in any new or more severe significant impacts than those identified in the approved project EIR. No new information would require the preparation of a supplemental or subsequent EIR.

4.10 SUMMARY OF IMPACTS

Table 7, *Mitigation Measures and Impact Level of Significance*, shows the level of significance for each impact analyzed in the certified EIR, and compares the approved project and the proposed project.

Table 7 Mitigation Measures and Impact Level of Significance

Impact	Certified EIR Required Mitigation Measures	Certified EIR Level of Significance (after mitigation)	Addendum to 2022 EIR Conclusion
Aesthetics			
AE-1 Have a substantial adverse effect on a scenic vista?	No Mitigation Required	Less than Significant	No New Significant Impacts No Increased Severity of Impacts No New Mitigation Measures
AE-2 Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	No Mitigation Required	No Impact	No New Significant Impacts No Increased Severity of Impacts No New Mitigation Measures
AE-3 In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	No Mitigation Required	Less than Significant	No New Significant Impacts No Increased Severity of Impacts No New Mitigation Measures

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Table 7 Mitigation Measures and Impact Level of Significance

Impact	Certified EIR Required Mitigation Measures	Certified EIR Level of Significance (after mitigation)	Addendum to 2022 EIR Conclusion
AE-4 Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	No Mitigation Required	Less than Significant	No New Significant Impacts No Increased Severity of Impacts No New Mitigation Measures
Air Quality			
AQ-1 Conflict with or obstruct implementation of the applicable air quality plan.	No Mitigation Required	Less than Significant	No New Significant Impacts No Increased Severity of Impacts No New Mitigation Measures
AQ-2 Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.	No Mitigation Required	Less than Significant	No New Significant Impacts No Increased Severity of Impacts No New Mitigation Measures
AQ-3 Expose sensitive receptors to substantial pollutant concentrations.	Mitigation Measure AQ-1	Less than Significant	No New Significant Impacts No Increased Severity of Impacts No New Mitigation Measures
AQ-4 Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.	No Mitigation Required	Less than Significant	No New Significant Impacts No Increased Severity of Impacts No New Mitigation Measures
Cultural Resources			
C-1 Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.	No Mitigation Required	Less than Significant	No New Significant Impacts No Increased Severity of Impacts No New Mitigation Measures
C-2 Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.	Mitigation Measures CUL-1 and CUL-2	Less than Significant	New Significant Impacts Increased Severity of Impacts No New Mitigation Measures
C-3 Disturb any human remains, including those interred outside of dedicated cemeteries.	No Mitigation Required	Less than Significant	No New Significant Impacts No Increased Severity of Impacts No New Mitigation Measures
Energy			
EN-1 Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	No Mitigation Required	Less than Significant	No New Significant Impacts No Increased Severity of Impacts No New Mitigation Measures
EN-2 Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	No Mitigation Required	Less than Significant	No New Significant Impacts No Increased Severity of Impacts No New Mitigation Measures
Greenhouse Gas Emissions			
GHG-1 Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	Mitigation Measures GHG-1 and GHG-2	Significant and Unavoidable	No New Significant Impacts No Increased Severity of Impacts Implementation of Mitigation Measures GHG-1 and GHG-2 would continue to reduce project impacts; however,

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Table 7 Mitigation Measures and Impact Level of Significance

Impact	Certified EIR Required Mitigation Measures	Certified EIR Level of Significance (after mitigation)	Addendum to 2022 EIR Conclusion
			impacts would still be considered significant and unavoidable. No New Mitigation Measures
GHG-2 Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	No Mitigation Required	Less than Significant	No New Significant Impacts No Increased Severity of Impacts No New Mitigation Measures
Noise and Vibration			
N-1 Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	Mitigation Measure NOI-1	Less than Significant	No New Significant Impacts No Increased Severity of Impacts No New Mitigation Measures
N-2 Generation of excessive groundborne vibration or groundborne noise levels.	Mitigation Measure NOI-2	Less than Significant	No New Significant Impacts No Increased Severity of Impacts No New Mitigation Measures
N-3 For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, if the project would expose people residing or working in the project area to excessive noise levels.	No Mitigation Required	Less than Significant	No New Significant Impacts No Increased Severity of Impacts No New Mitigation Measures
Population and Housing			
P-1 Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through the extension of roads or other infrastructure).	No Mitigation Required	Less than Significant	No New Significant Impacts No Increased Severity of Impacts No New Mitigation Measures
P-2 Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.	No Mitigation Required	No Impact	No New Significant Impacts No Increased Severity of Impacts No New Mitigation Measures
Transportation			
T-1 Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	No Mitigation Required	Less than Significant	No New Significant Impacts No Increased Severity of Impacts No New Mitigation Measures
T-2 Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).	Mitigation Measure TRA-1	Less than Significant	No New Significant Impacts No Increased Severity of Impacts No New Mitigation Measures
T-3 Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous	No Mitigation Required	Less than Significant	No New Significant Impacts No Increased Severity of Impacts No New Mitigation Measures

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Table 7 Mitigation Measures and Impact Level of Significance

Impact	Certified EIR Required Mitigation Measures	Certified EIR Level of Significance (after mitigation)	Addendum to 2022 EIR Conclusion
intersections) or incompatible uses (e.g., farm equipment).			
T-4 Result in inadequate emergency access	Mitigation Measure TRA-2	Less than Significant	No New Significant Impacts No Increased Severity of Impacts No New Mitigation Measures

4.11 FINDINGS

This Addendum provides the analysis necessary to evaluate the proposed project in accordance with CEQA Guidelines 15162 and 15164 to determine whether a subsequent EIR is required. The analysis in this Addendum confirms that the proposed project would not result in any new substantial project changes or substantial changes with respect to the circumstances under which the project is undertaken that require major revisions to the Final EIR due to the involvement of a new significant impact or a substantial increase in the severity of an impact. Further, there is no new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the Final EIR was certified, showing any of the conditions identified in CEQA Guidelines Section 15162(a)(3).

Thus, the proposed project does not trigger any of the conditions in CEQA Guidelines Section 15162 requiring the preparation of a subsequent EIR, and the appropriate environmental document as authorized by CEQA Guidelines Section 15164(b) is an addendum.

The following identifies the standards in CEQA Guidelines Section 15162 as they relate to the proposed project. When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in light of the whole record, one or more of the following:

- 1. No substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects**

As discussed in Section 3.1 of this Addendum, the proposed project would construct a mixed-use development with 374 dwelling units, comprised of 318 market-rate units and 56 affordable units, and 94,398 square feet of commercial uses, and includes several changes as compared to the approved project. As compared to the approved project, the proposed project includes an increase in project residential density, a reduction in setback and stepback requirements, a reduction in minimum unit size, and parking requirements, which are the subject the applicant's requests under the State Density Bonus Law and are ministerial approvals. The proposed project would have the same general uses and layout as the approved project, although there are differences in the amount of uses and the site plan. See Table 2, *Summary of Approved Project vs Proposed Project*, for changes between the approved project and proposed project.

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As described previously, construction of the proposed project includes state-of-the-art modular buildings which would be assembled and installed onsite. This construction method reduces the scope of construction activity onsite and the number of construction workers and personnel needed onsite, compared to the approved project. Due to the use of modular building components and reduced excavation/grading needed (including eliminating the need for pile driving), construction impacts associated with aesthetics, air quality, greenhouse gas, energy, noise, and transportation would thereby be less than previously analyzed for the approved project. Other construction activities including, but not limited to, demolition and removal of hardscapes, architectural finishings, and landscaping would produce similar impacts to the approved project.

Because vehicle trips are the dominant criteria air pollutant and GHG emissions and noise source for land use development projects and is the principle factor for transportation impacts, operational impacts for air quality, GHG emissions, noise, and transportation were analyzed based on the daily vehicle trips. The proposed project is anticipated to generate 1,141 average daily vehicle trips fewer than the approved project. Additionally, although operation of the proposed project would generate similar criteria air pollutant emissions from area sources, emissions from building energy use would be minimized with the use of current California Building and Energy Efficiency Standards; each iteration of the California Building and Energy Efficiency Standards is assumed to achieve greater energy efficiency performance in new buildings than the last. Thus operational impacts associated with air quality, greenhouse gas, and noise would be less than previously analyzed within the approved project. Additionally, although the proposed project would result in an increase of 24 residential units, the proposed project impacts to population and housing would be similar to those of the approved project.

The proposed project would require the removal of two character-defining features of the City Hall historical resource, the hexagonal planter clad in mosaic tiles, and the granite plinth with bronze signage and flagpoles. However, for the reasons discussed in the Supplemental Historic Resources Analysis Memorandum and above, City Hall would retain its eligibility for listing as a historic resource and impacts would not differ from those of the approved project.

As discussed in Section 4.8.2 of the Addendum, the proposed project includes the same types of uses as the approved project and like the uses of the approved project, the proposed project uses would not be considered regional-serving and would instead serve the local community. In addition, the proposed project would implement Mitigation Measures TRA-1 (which includes a comprehensive TDM program) and TRA-2 and with mitigation would not result in a significant VMT impact, as with the approved project.

Therefore, no substantial changes are proposed that will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

2. **No substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects**

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A change that has occurred on the project site since the EIR was certified is that the City Hall tiled steps leading into the building have been painted over with black paint. Additionally, the state updates the California Building Energy Efficiency Standards. Since the EIR was certified, the 2022 Building Energy Efficiency Standards became effective as of January 2023, and the state updates these standards every three years. Updates to these standards serve to improve building energy efficiency in new construction and would not be considered a substantial or unusual change in circumstances (California Department of General Services 2024). No substantial changes have occurred within the project site or the surrounding area in regard to circumstances in which the approved project would be undertaken. As described previously, the proposed project's reduction of commercial square footage by 15,602 square feet and its increase of 24 residential units, would result in impacts that are less than or equal to those analyzed in the certified EIR. Impacts to aesthetics, air quality, cultural, energy, greenhouse gas emissions, noise and vibration, population and housing, and transportation would remain at similar or reduced levels than what is identified in the certified EIR for the approved project. Therefore, no major revisions to the certified EIR would be required due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

3. No new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete shows any of the following:

a. The project will have one or more significant effects not discussed in the previous EIR

Similar to the approved project, the proposed project would construct a mixed-use development with dwelling units, commercial uses, and additional parking on site. The proposed project would reduce commercial square footage from 110,000 square feet to 94,398 square feet, a reduction of 15,602 square feet as compared to the approved project, and increase the total residential units from 350 to 374 representing, an increase of 24 units above that of the approved project. However, the reduction in commercial uses and the increase in residential units would not result in new or increased significant environmental impacts. Environmental impacts under the proposed project would be considered less than or equal to those analyzed in the certified EIR. There is no new information of substantial importance that shows that the proposed project would have one or more significant effects not discussed in the previous EIR.

b. Significant effects previously examined will not be substantially more severe than shown in the previous EIR

The proposed project's reduction in commercial uses and the increase in residential units as compared to the approved project would result in similar or reduced physical environmental effects, as compared to the approved project. The proposed project would be required to implement all mitigation measures identified in the certified EIR. As substantiated in this analysis, no significant effects previously examined will be substantially more severe than shown in the previous EIR.

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- c. **There are no mitigation measures or alternatives previously found not to be feasible that would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative**

The certified EIR analyzed the following alternatives to the approved project:

1. **No Project:** Alternative 1, the No Project Alternative, would assume that the proposed project would not be approved and no Specific Plan would be established.
2. **All Residential Alternative:** Alternative 2 would allow redevelopment of the project site to include up to 425 dwelling units and associated open space uses, and not commercial or retail uses would be provided.
3. **Reduced Commercial Alternative:** Alternative 3 would allow for up to 405 dwelling units, 10,000 square feet of commercial space (a reduction of 100,000 square feet of commercial uses), and associated open space uses.

No mitigation measures or alternatives previously found not to be feasible would in fact be feasible. The mitigation measures identified within the certified EIR would remain applicable to the proposed project. As substantiated in Section 4 of this Addendum, the proposed project results in similar to reduced impacts compared to the approved project.

- d. **Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative**

The proposed project would have environmental impacts that would be similar to or less than those of the approved project. As stated previously, no new substantial impacts would occur as a result of the proposed project. There is no new information of substantial importance that shows that mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment. The Mitigation Measures adopted for the EIR will apply to the proposed project.

5. References

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