DRAFT

ENVIRONMENTAL IMPACT REPORT (EIR)
ENVIRONMENTAL IMPACT STATEMENT (EIS)
(SCH # 2018091035)

FOR THE
ROSE HILL COURTS REDEVELOPMENT PROJECT

CEQA LEAD AGENCY	NEPA LEAD AGENCY
Housing Authority of the City of Los Angeles (HACLA) 2600 Wilshire Boulevard, 4th Floor Los Angeles, CA 90057	**Los Angeles Housing + Community Investment Department (HCID)** 1200 West 7th Street, 1st Floor Los Angeles, CA 90017 *Responsible Entity for the United States Department of Housing (HUD)*

PREPARED BY:

UltraSystems Environmental Inc.
16431 Scientific Way
Irvine, CA 92618-4355
T: 949-788-4900 | F: 949-788-4901

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1.0 EXECUTIVE SUMMARY

This section has been prepared pursuant to the California Environmental Quality Act (CEQA) for the proposed Rose Hill Courts Redevelopment Project (Project). In accordance with State CEQA Guidelines § 15123, this chapter provides a brief project description; identifies significant effects and proposed mitigation measures or alternatives that would reduce or avoid those effects; describes areas of controversy known to the Lead Agency and issues to be resolved; summarizes alternatives; and summarizes environmental impacts.

1.1 Purpose of this Draft EIR

As described in Section 15123(a) and 15362 of the CEQA Guidelines, an EIR is an informational document that will inform public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to minimize any significant effects, and describe reasonable project alternatives. Therefore, the purpose of this Draft EIR is to focus the discussion on the Project's potential environmental effects that the Housing Authority of Los Angeles (HACLA), as the Lead Agency, has determined to be, or potentially may be significant. In addition, feasible mitigation measures are recommended, when applicable, that could reduce or avoid the Project's significant environmental impacts.

This Draft EIR serves as the environmental document for all actions associated with the Project. This EIR is a "Project EIR" as defined by Section 15161 of the CEQA Guidelines. Furthermore, this Draft EIR complies with Section 15064 of the CEQA Guidelines which discusses determining the significance of the environmental effects caused by a project.

1.2 Draft EIR Focus and Effects Found Not to Be Significant

In accordance with State CEQA Guidelines § 15128, the EIR shall contain a brief statement indicating reasons the various possible significant effects of a project were determined not to be significant and not discussed in detail in the Draft EIR. The Initial Study and Environmental Assessment (EA) for the Project were distributed for public review between September 19th and October 22, 2018, for 33 days, in excess of the 30-day required distribution under CEQA. The Initial Study is included as **Appendix B1** to this document. The Environmental Assessment is **Appendix B2** to this document. The CEQA and NEPA notices for the Project are included in Appendices A1-A3 of this document. Comment letters are included in **Appendix D** of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impacts of the Project and the reasons that each environmental topic is or is not analyzed in this Draft EIR. The Initial Study found the potential for significant impacts in the following environmental issues areas:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils (and Paleontology)
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Land Use and Planning
- Noise
- Population and Housing
- Public Services (including fire protection, police protection, schools, recreation and parks, and libraries)
- Transportation
- Tribal Cultural Resources

In January 2018, OPR proposed updates to the CEQA Guidelines which revised thresholds for various environmental topics and the addition of the topics of Wildfire and Energy. This EIR includes these two new topics, which are analyzed in **Sections 4.14** and **4.15** of this Draft EIR, respectively. The updated CEQA Guidelines became effective on December 28, 2018 and are reflected throughout this Draft EIR. The threshold questions that were not screened out in the Initial Study prepared for the Project are analyzed in this Draft EIR and have been updated to reflect the revised CEQA Appendix G threshold questions. It was determined through the Initial Study that the Project would not have the potential to result in significant impacts related to: Agriculture and Forestry Resources, Hydrology and Water Quality, Mineral Resources, and Utilities and Service Systems. Therefore, these areas were not analyzed in this Draft EIR. The Initial Study which details that no significant impacts would occur for these issue areas is included as **Appendix B1** of this Draft EIR.

1.3 Draft EIR Organization

This Draft EIR is comprised of the following sections:

1.0 Executive Summary. This section describes the purpose of this Draft EIR, Draft EIR focus and effects found not to be significant, Draft EIR organization, project summary, areas of controversy and issues to be resolved, public review process, summary of alternatives, and summary of environmental impacts and mitigation measures.

2.0 Project Description. This section describes the project location, existing conditions, project objectives, and characteristics of the project.

3.0 Environmental Setting. This section contains a description of the existing physical and built environment and a list of related projects anticipated to be built in the vicinity of the Project Site.

4.0 Environmental Impact Analysis. This section contains the environmental setting, project and cumulative impact analyses, mitigation measures (as necessary), and conclusions regarding the level of significance after mitigation for the following environmental issue areas: aesthetics, air quality, biological resources, cultural resources, geology and soils/paleontological resources, greenhouse gas emissions, hazards and hazardous materials, land use and planning, noise, population and housing, public services (including fire protection, police protection, schools, recreation and parks, and libraries), transportation, tribal cultural resources, wildfire, and energy.

5.0 Alternatives. This section analyzes a reasonable range of project alternatives, including: No Project/No Action Alternative; Non-Historically Compliant Rehabilitation Alternative; and the Historic Rehabilitation Alternative.

6.0 Other CEQA Considerations. This section describes significant unavoidable Project impacts and the reasons why the Project is being proposed notwithstanding the significant unavoidable impacts. An analysis of the significant irreversible changes in the environmental and potential secondary effects of the Project are also included. Additionally, this section analyses potential growth-inducing impacts of the Project and potential secondary effects caused by the implementation of mitigation measures for the Project. This section also contains a discussion of the possible effects of the Project that were determined not to be significant within the Initial Study prepared for the Project.

7.0 References. Identifies the references cited in the EIR/EIS, including the documents (printed references) and individuals (personal communications) consulted in preparing this document.

8.0 Acronyms and Abbreviations. Presents a glossary of the terms, acronyms, and abbreviations used in the EIR/EIS.

9.0 List of Preparers. Identifies the agencies, consultants, and individuals involved in preparing this EIR/EIS.

10.0 Consultation and Coordination. This section details the federal, state, and local agencies and organizations contacted during preparation of the EIR/EIS.

11.0 Mitigation Monitoring and Reporting Program (MMRP). Lists the various mitigation measures and identifies the parties responsible for carrying out the monitoring to ensure compliance. Section 21081.6 of the Public Resources Code requires all state and local agencies to establish monitoring or reporting programs whenever approval of a project relies upon a mitigated negative declaration or an EIR. The monitoring or reporting program must ensure implementation of the measures being imposed to mitigate or avoid the significant adverse environmental impacts identified in the mitigated negative declaration or EIR.

12.0 Recipients of the Draft EIR/EIS. This section includes a list of agencies, organizations, and individuals to whom notification of availability of the draft EIR/EIS were sent.

In addition to the sections listed above that are included in this EIR to satisfy the requirements of CEQA, this EIR also includes the following section (Section 13.0) to satisfy NEPA requirements under 24 CFR Part 58:

13.0 Environmental Impact Statement (EIS). Identifies the determinations and compliance findings for HUD-assisted projects, pursuant to 24 CFR Part 58. Environmental topical areas that are addressed include: aesthetics, air quality, biological resources, cultural resources, environmental justice and socioeconomics, geology and soils/paleontological resources, greenhouse gas emissions, hazards and hazardous materials, land use, noise, population and housing, public health and safety, public services, recreation, transportation, and tribal cultural resources. The EIS also addresses the following subjects in compliance with 24 CFR, Sections 50.4, 58.5, and 58.6: airport hazards, coastal barrier resources, flood insurance, clean air, coastal zone management, contamination and toxic substances, endangered species, explosive and flammable hazards, farmlands protection, floodplain management, historic preservation, noise abatement and control, sole source aquifers, wetland protection, wild and scenic rivers, environmental justice, land development, socioeconomic, and natural features.

Section 13.0 (EIS) will be available for public review on September 20, 2019, soon after the availability of this Draft EIR. The Draft EIS will be posted on HCID's website at: http://hcidla.lacity.org/NEPA-review and on HACLA's website at: http://www.hacla.org/dsprojects/ID/8/Rose-Hill-Courts, and noticed in the Federal Register. CDs and paper copies of the Draft EIR/EIS will also be available for public review at the following locations during regular business hours:

- HACLA at 2600 Wilshire Blvd, Los Angeles, CA 90057

- The Administrative Office of the Rose Hill Courts Community Center located at 4446 Florizel St., Los Angeles, 90032. To review the Draft EIR/EIS, please contact Mario Ramsey at: (323) 342-6710 to schedule an appointment for viewing.

- El Sereno Branch Library, located at 522 Huntington Drive S., Los Angeles, CA 90032 (T: 323/225-9201).

Appendices. Presents data supporting the analysis and contents of this draft EIR/EIS.

This Draft EIR includes the environmental analysis prepared for the Project and appendices as follows:

- Appendix A – Notices and Distribution of Initial Study and Environmental Assessment
  - Appendix A1 – Notice of Preparation Filing with the Los Angeles County Clerk
  - Appendix A2 – Notice of Intent Published in the Federal Register
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- Appendix O – Traffic Impact Report
- Appendix P – Energy Calculations
- Appendix Q – Paleontological Records Search

- Appendix R – Sewer, Fire and Water Capacity Report Information

1.4 Existing Project Site Conditions

The Project Site is currently developed as the Rose Hill Courts apartment complex, which is owned by HACLA. The Rose Hill Courts complex filled an essential need for new quality housing in the Los Angeles area during and after the Second World War, and it continues to be in use today (GPA, 2015, p. 16). The Rose Hill Courts complex consists of an administration building (i.e., offices and a common room with a kitchen, pantry, and two bathrooms) and 14 two-story, wood-frame buildings with townhouse and flat style apartments comprising 100 units. The apartment complex was designed in the Garden City and Modern style, which was typical of public housing projects of the 40's era. Characteristics of the Garden City and Modern style include: low density; modern architectural characteristics, including the standardization and repetition of building types; and placement and orientation of the buildings on a project site to maintain low density. Rose Hill Courts by its general layout is an example of the Garden City and Modern style, since the buildings cover 19 percent of the land area, and no buildings exceed two stories (Ibid., p. 19).

In 2003, Rose Hill Courts was determined eligible for listing in the National Register of Historic Places (NRHP) through the federal review process pursuant to Section 106 of the National Historic Preservation Act (NHPA) of 1966. According to the Determination of Eligibility, Rose Hill Courts is significant at the local level under Criteria A and Criteria C –for its association with the development of public and defense housing during World War II, and as an excellent example of a public housing complex following the planning and design principals of the Garden City and Modern movements. Because it was determined eligible for the NRHP, it is automatically included in the California Register of Historical Resources (CRHR).

The property is on a slope; the northwest end is the highest point and the southeast end is the lowest point. Landscaping on the Project Site consists of grassy open areas with mature trees and shrubs, as well as concrete planters. The 15 buildings include an administration building and 14 residential buildings containing 100 dwelling units. The buildings are rectangular or square in plan and are generally arranged in parallel groupings. The north block includes the administration building facing Florizel Street. To the west of the administration building there are three rectangular residential buildings, and to the east are one rectangular, and four square residential buildings. The south block includes six rectangular residential buildings. Parking for the complex consists of paved surface parking areas located along both sides of a private driveway that bisects the northern and southern blocks of the Project Site. There are five building types on the site. All of the buildings are one or two stories in height, with wood-frame construction, concrete slab foundations, and composition roofing.

The site is located within the Northeast Los Angeles Community Plan (Community Plan), in the El Sereno neighborhood area of the City of Los Angeles. City of Los Angeles land use plans applicable to the Project include the City of Los Angeles General Plan, including the Framework Element, the Community Plan, and the Citywide Urban Design Guidelines.

The Project Site has a land use designation of low density residential (which corresponds to RE9, RS, R1, RU, RD6, RD5 zones). The site is zoned for residential uses with a zoning designation of [Q]R1-1D. The "Q" Qualified Classification and "D" Development Limitation represent implementation of the Northeast Los Angeles Hillside Ordinance which limits building height and FAR.

1.5 Description of the Proposed Project

1.5.1 Project Overview

Rose Hill Courts is public housing currently owned by HACLA. In order to finance and develop the Project, HACLA and Related will form a limited partnership, that will obtain the necessary debt and equity financing to construct the new units, through a Disposition and Development Agreement and long-term ground lease with HACLA. The partnership will own the improvements for the term of the ground lease and HACLA will remain the owner of the underlying land. HACLA will ensure that restrictions will be in place throughout the term of the ground lease, to ensure long term affordability of the units. Thus, the improvements will be privately owned and managed affordable housing and the land will remain under public ownership.

The Project would be developed in two phases. The Project would demolish the existing 15 structures and construct a total of 185 residential housing units (183 affordable housing units onsite plus two market-rate managers' units). Seven buildings (20 units, estimated total 17,017 square feet) and the existing administrative building (estimated 2,810 square feet) would be demolished in Phase I. Eight buildings (80 units, estimated total 62,818 square feet) would be demolished in Phase II.

The Project proposes 88 one-bedroom units, 59 two-bedroom units, 30 three-bedroom units, and eight four-bedroom units. There would be a total of nine new residential buildings (Buildings A through I) totaling 156,926 square feet. The Project would include a 6,366-square-foot Management Office/Community Building (Building J) and a "Central Park" green space, creating a park-like setting for residents. The Project would provide a total of 174 parking spaces onsite, with at-grade and tuck-under parking; upgraded lighting, fencing, signage, and security features; and storm drain and utility improvements. The new sustainably designed buildings would be energy efficient and the landscaping would include water-efficient irrigation.

Phase I includes two residential buildings (Buildings A and B totaling 70,610 square feet). Phase II includes seven additional buildings (Buildings C through I) totaling 86,316 square feet. and Building J, which is a 6,366-square-foot Management Office/Community Building. Overall, the Project would remove approximately 79,835 square feet of existing residential floor area and construct up to 156,926 square feet of new residential floor area, resulting in a net increase of up to 77,091 square feet of net new residential floor area within the Project Site. When completed, an additional 83 affordable units would be provided as compared to the existing Rose Hill Courts complex.

The Project would include ample open space and recreational amenities to promote continued community outdoor use. The Project would include 125,022 square feet of open space and landscaped areas with walkways. This includes a total landscaped area of 63,653 square feet plus 61,369 square feet of total open space. These spaces would include outdoor communal space with shaded seating and grills, and children's play areas with tot lots, paved surfaces, and several courtyards. Specifically, the Project would create a total of 44,012 square feet of common outdoor space and 9,350 square feet of private open space, in addition to 8,007 square feet of common indoor space.

1.5.2 Project Design

Phase I includes two four-story elevator buildings with flats, in order to provide the maximum level of accessibility for the existing tenant population (many of whom are elderly/disabled) who will move into Phase I once it is completed. Building A in Phase I will include community spaces for

residents of both Buildings A and B and an onsite leasing office that will ultimately be relocated to the Management Office/Community Building, once Phase II is complete.

The proposed buildings would be designed in a contemporary style. Projecting balcony decks, horizontal overhangs and canopies would be integrated with other architectural elements, such as balcony railings and shading devices. These architectural elements would provide horizontal and vertical articulations that would serve to break up the building planes and modulate building massing. The buildings are designed with a variety of exterior finishes, including stucco, composite siding, storefront windows, simulated wood accents, metal railings, integrated signage and lighting.

Phase II will be developed on the remainder of the Project Site and steps down in massing and height to provide a residential scale appropriate for the adjacent land uses. Buildings C and D (facing Boundary Ave.) are three stories, 46 feet in height, and would each contain 24 units; Buildings E and F, which are located towards the interior of the site, are three stories with tuck-under parking, and Buildings G, H and I (facing Mercury Avenue) are two stories in height. The design promotes an "eyes on the street" approach, with individual unit entries for Buildings G, H, and I along Mercury Avenue and ground-level patios encouraging resident interaction with passersby.

Phase II transitions from the contemporary style of Phase I to a more traditional style along Mercury Avenue. Building C and D represent a stylistic transition from Building A and B, utilizing some of the same materials. Buildings E-I are more traditional in design with a "cottage" residential look, and their exterior expression includes balconies, pitched rooflines, horizontal and vertical "wood look" composite siding. These buildings would include trellises, asphalt shingled roofs, recessed dual-glazed vinyl windows, horizontal siding, and exterior stucco.

1.5.3 Access, Circulation, and Parking

Vehicular access to the Project Site would be provided via six driveways, including one entry driveway located along McKenzie Avenue (serving the Management Office/Community Building and Building I). Three entry/exit driveways along Florizel Avenue serve the parking lots of Buildings A, B and C. Two entry/exit driveways along Mercury Avenue serve Buildings D, E and G and Buildings F and H, respectively. Trash collection trucks would access the Project Site using these driveways and the trash collection areas would be enclosed and not visible to the surrounding uses.

As described above, the proposed uses would be supported by 174 automobile parking spaces, which meet the parking requirements as set forth in the LAMC, that would be distributed throughout the Project Site in a combination of surface parking lots and tuck-under parking spaces. This equates to approximately 0.94 parking space per unit. Parking areas were located to provide minimal walking distance from parking space to entry lobbies, to accommodate the existing disabled/elderly population. The Project would comply with City requirements for providing electric vehicle charging capabilities and electric vehicle charging stations within the proposed parking areas.

New pedestrian access points would be created throughout the Project Site via pedestrian walkways connecting to the interior central green space between the individual buildings. The central green space of the site is connected to Rose Hill Park to the north via a pedestrian walkway between Buildings A and B. Bicycle storage areas would be included in the basement level of Building A. Buildings C and D can access Ernest E. Debs Regional Park directly from their main entry walkways located off of Boundary Avenue. All buildings either connect directly to perimeter streets, or, in the case of Buildings E and F, through walkways connecting south to Mercury Avenue. ln accordance with the requirements of the LAMC approximately 137 bicycle parking spaces (Phase I: 60 long-term

spaces and six short term; Phase II: 64 long-term spaces and seven short term) would be provided for the proposed residential uses.

1.5.4 Landscaping and Open Space

The central green space includes several discrete activity areas, each with a unique design theme and use. Outdoor space adjacent to the Community Building offers places for social gatherings, and special events and celebrations, with shaded seating areas and BBQ grills for outdoor dining. Areas designed for use by children would feature tot lots for children from 2-12 years of age, teen hard surface play areas, open grassy areas, and experiential play elements that encourage interaction and group play. Other amenities include a community/recreation room, picnic tables, lounge seating, bocce ball area, vegetable garden, adult exercise area, and overlook deck with seating. The landscape design would create a park-like setting for residents. Refer to **Figure 2.6-2** for details.

In the comment letter from Darryl Ford (Ford, 2018, City of Los Angeles Department of Recreation and Parks) regarding the proposed Project, it states: "We encourage the applicant to link with nearby recreation and park facilities and consider mutually beneficial partnerships between park programs, operations, and improvements." In response to the recommendation of the City of Los Angeles Department of Recreation and Parks, the Project would include the Project Design Feature (PDF) listed below.

<u>Project Design Feature</u>

Recreation and Parks PDF-1: Not less than 90 days prior to the anticipated construction completion the Project Applicant will reach out to the City of Los Angeles Department of Recreation and Parks staff responsible for the programming (if any) at various neighborhood, community, and regional parks located within a 2-mile radius of the Project site to consider mutually beneficial partnership between park programs, operations, and improvements. These parks and recreation facilities include, but are not limited to, El Sereno Arroyo Playground, El Sereno Community Gardens, Henry Alvarez Memorial Park, Hermon Dog Park, Hermon Park, Arroyo Seco Park, Carlin G Smith Recreation Center, Cypress Recreation Center, Cypress Recreation Center, Downey Recreation Center, Ascot Hills Park and Charles F. Lummis Home.

As detailed in the Preliminary Landscape Plan for the Project, the landscape design theme would complement the architectural style and would be California Eclectic with a selection of drought tolerant and low maintenance plant materials. The plants would be in conformance with the requirements of the high Fire Hazard Severity Zone. Plant selections are based on their aesthetic/horticultural value, durability, low water use, low maintenance, and fire-retardant characteristics. Tree selections are London Plane trees, Fern Pine, Palo Verde, Olive, Mesquite, African Sumac, Marina Strawberry Tree. Crape Myrtle, Jacaranda and Gold Medallion trees were selected for visual accent. All landscape areas would conform to the City of Los Angeles Landscape Ordinance.

Water-efficient irrigation, such as dripline emitter tubing, would be used in planting areas and dedicated low-flow bubblers would be utilized for irrigation of trees. Irrigation system improvements would include new weather based "Smart controller" and a dedicated irrigation water meter. The irrigation methods for the Project would meet and exceed the City of Los Angeles Landscape Ordinance for water conservation. The water delivery systems have been designed in

conformance with Hydrozone requirements for accurate calibration of water conservation design methods.

1.5.5 Lighting and Signage

The Project will include low-level exterior lighting that will be located on the buildings, and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated throughout the Project Site. All lighting would comply with current energy standards and codes as well as design requirements while providing appropriate light levels. Project lighting would be designed to provide efficient and effective onsite lighting while minimizing light trespass from the Project Site, reducing sky glow, and improving nighttime visibility through glare reduction. Where appropriate, interior lighting would be equipped with sensors or timers that would turn lights off when no one is present. All exterior and interior lighting would meet high energy efficiency requirements utilizing light-emitting diode (LED) or efficient fluorescent lighting technology. New street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would be approved by the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on both sidewalks and roadways while minimizing light and glare on adjacent properties.

Proposed signage would be designed to be aesthetically compatible with the proposed architecture of the Project Site and with the requirements of the Los Angeles Municipal Code. Proposed signage would include identity signage, either blade or monument, near the Management Office/Community Building, building and tenant signage, and general ground level and wayfinding pedestrian signage. No off-premises or billboard advertising is proposed as part of the Project. The Project would not include signage with flashing, mechanical, or strobe lights. Project signage would be illuminated via low-level low-glare external lighting, internal halo lighting, or ambient light. Exterior lighting for Project signage would comply with light intensities set forth in the LAMC and as measured at the property line of the nearest residentially zoned property.

1.5.6 Fencing and Security

Fencing would be located between buildings. The central green area would be fenced from the street, and pedestrian walks accessing perimeter streets would have combination of hedges and fencing to clearly define paths of access. Refer to **Figure 2.6-3** which is the fence and gate plan for the Project. As detailed in this plan, a five-foot tubular steel fencing is proposed on the interior of the Project Site to provide security and maintain resident access to the Project Site.

The site will have security features including: cameras and controlled access to mid-rise buildings. Ground rules will be established by the property management company (Related Management Company) and onsite maintenance staff will keep the property clean. Refer to **Figure 2.6-3**, which shows areas where secured access to the Project Site are located. Secured building entry points and pedestrian security gates are located throughout the Project Site.

1.5.7 Sustainability Features

The proposed Project has been designed based on principles of smart growth and environmental sustainability by increasing the residential density onsite, creating an emphasis on walkability and access to public open space, with proximity to nearby retail, educational and transit amenities. In addition to being located near existing infrastructure needed to serve the proposed uses, the new buildings would be designed and constructed to incorporate environmentally-sustainable design

features under Build It Green's "GreenPoint Rated" system. "Green" principles would be incorporated throughout the Project to comply with the City of Los Angeles Green Building Code (Ordinance No. 184,692). Such features would include energy-efficient buildings and water conservation and waste reduction measures, among others. The new buildings would include water and energy efficient fixtures and appliances such as high-efficiency toilets and shower heads, high-efficiency Energy Star appliances, and energy efficient LED lighting as appropriate. The Project would also utilize sustainable planning and building strategies and would incorporate the use of environmentally-friendly materials, such as non-toxic paints and recycled finish materials wherever possible.

In accordance with CEQA Guidelines Appendix F**, Section 4.15,** Energy, of this Draft EIR provides further information regarding energy-consuming equipment and processes that would be used during construction and operation of the Project, energy requirements of the Project, energy conservation equipment and design features of the Project, energy supplies that would serve the Project, and total estimated daily vehicle trips that would be generated by the Project.

The Project would comply with the Los Angeles Green Building Code, which is based on the 2016 California Green Building Standards Code (CalGreen) (Part 11 of Title 24, California Code of Regulations).

1.5.8 Relocation Plan

As will be described in more detail in the Relocation Plan that will be prepared for Rose Hill Courts, the Project will involve relocating the current households while the demolition and new construction occurs. A two-phase approach to the redevelopment is being utilized to minimize the amount of time offsite for the residents. Phase I involves the demolition of 20 units, 15 of which are currently occupied (as of January 2019). Once the existing buildings on the Phase II portion of the site are vacated, demolition and construction of Phase II can begin.

Currently, Rose Hill Courts is a federal public housing development under an annual contribution contract ("ACC") with HUD that provides that the residents pay no more than 30 percent of their income on rent and the balance, to a point, is made up by the Federal government based on a national formula. HUD Funding for public housing units does not provide sufficient funds for maintenance, renovation or redevelopment. The amount of funding that HACLA receives for public housing units on a per-unit basis is less than what it receives for units assisted under the Section 8 program. The redevelopment of Rose Hill Courts would be made possible by converting the HUD assistance from public housing funding to Section 8 Housing Choice Voucher funding pursuant to the Rental Assistance Demonstration ("RAD") program and the Project Based Voucher ("PBV") program. The Section 8 program provides rental subsidy from HUD that, in the case of RAD, is more stable than ACC funding from a federal appropriations perspective, and, in the case of the PBV program, generates more operating income that supports debt and investment from private and public institutions to pay redevelopment costs.

In order to minimize displacement of in-place families in redevelopment efforts, the PBV program permits housing authorities to add these existing families to the Section 8 waiting list and, once the families' continued eligibility is determined, they can be "given an absolute selection preference and referred to the project owner for an appropriately sized PBV unit in the project." In other words, the families' right to return is conditioned on the existence of a "right-sized" unit. In addition, the PBV program rules require that "the contract unit leased to each family must be appropriate for the size of the family under the PHA's subsidy standards." If a family is occupying a "wrong-sized unit," HUD

requires PHAs to offer the family either PBV assistance "in an appropriate-size unit (in the same project or in another project)" or "other project-based housing assistance (e.g., by occupancy of a public housing unit)." Unlike the tenant-based Housing Choice Voucher program, a PBV occupant cannot elect to spend more than 30 percent of their income towards rent in order to rent a larger unit. Given that the rehabilitation-only scenario would not allow for a substantially altered unit mix, the application of the PBV rules would mean that the existing occupants could not return to the site and many over-housed families would be displaced. By contrast, the Project includes housing units designed to meet the needs of the current resident population, thus avoiding displacement, and calls for the development of 85 additional units on the site appropriate to larger families, thus addressing a critical housing need in the City.

In addition to complying with all federal and state statutes and regulations for relocation, HACLA and Related jointly pledge to provide the residents of Rose Hills Courts with professional relocation assistance. Prior to the start of construction, HACLA will adopt a Relocation Plan. The Plan will identify temporary relocation requirements, special needs and preferences for the households and the policies and procedures HACLA will follow. To obtain information necessary for the implementation of this Plan, the Relocation Consultant will conduct interviews with each Rose Hill Courts household prior to any relocation activities. The residents who live in Phase I will be provided with the opportunity to move into an un-impacted unit onsite if a unit is available, or to offsite accommodations while Phase I is being constructed. Once Phase I is complete, any residents that were temporarily housed offsite will have first priority to move into Phase I and those families who live in the occupied units of Phase II's footprint will be able to move directly from their unit into a completed unit in Phase I based on seniority or tenancy at Rose Hill Courts. For each phase, households currently residing in either over-housed or under-housed conditions will be matched into a correctly-sized replacement unit as per applicable Section 8 occupancy standards. All families will receive counseling on their relocation rights and options as well as moving assistance.

1.6 Project Construction and Scheduling

Project construction is anticipated to begin in 2021 for Phase I and 2022 for Phase II. Construction activity for Phase I would commence with any necessary remediation of lead and asbestos, followed by demolition of seven existing structures and associated surface parking lot area, followed by grading and excavation. Building foundations would then be laid, followed by building construction, paving/concrete installation, and landscape installation. Phase II would follow similar steps, except with more buildings to be demolished and a greater site area, the remediation, demolition, excavation/grading phases, and landscaping phases would likely be longer, and the building construction phase shorter. Project construction, which would be approximately 18 months per phase, is anticipated to be completed in 2022 for Phase I and 2024 for Phase II. Workforce will vary based on the scheduled activities to over 100 at peak with an average of 40-60 workers per day.

1.7 Necessary Approvals

Approvals required for development of the Project may include, but are not limited to, the following:

Table 1.0-1
PERMITS AND APPROVALS

Agency	Permit or Approval
Housing Authority of the City of Los Angeles (HACLA) CEQA Lead Agency	• Certification of the EIR • Approval of Disposition and Development Agreement • Approval of Relocation Plan for Residents • Project-based Section 8 vouchers
City of Los Angeles	• Demolition and Building Permits, including approval for demolition of historic buildings • Public Benefit Project with Alternative Compliance (PUB) under Los Angeles Municipal Code § 14.00B • Affordable Housing Density Bonus (SB 1818) as identified in LAMC § 12.22 A.25: Request is to allow a Density Bonus project with off-menu incentives. • Lot Tie/Lot Line Adjustment Process due to Phase I and II being on separate lots. • Permit for the removal of street trees (if required) • Haul Route approval (if necessary)
Utilities	• Utility coordination and permits
United States Department of Housing and Urban Development (Delegated to HCID)	• NEPA Part 58 Compliance/ Adoption of the EIS
HUD	• Section 18 Demolition and Disposition of existing Rose Hill Courts • Rental Assistance Demonstration (RAD) Conversion

1.8 Areas of Controversy

Based on the NOP comment letters provided in **Appendix D** of this Draft EIR, issues known to be of concern included, but were not limited to, Project impacts on: air quality, energy, hazards and hazardous materials, and tribal cultural resources**.** Refer to **Appendix D** for all comments received during the public review period, including tracking table that provides a summary of the comments received during the public review period, where those comments are addressed in the EIR, and, any responses provided back to the commenter during the public review period. It should be noted that CEQA does not require the lead agency to respond individually to all comments received during the public scoping period.

1.9 Public Review Process

The Initial Study and Environmental Assessment (EA) for the Project were distributed for public review between September 19th and October 22, 2018, for 33 days, in excess of the 30-day required distribution under CEQA. Below is a summary of the public notification and scoping process for the Project. The Notice of Preparation (NOP) included information regarding the Project, notice of availability of the Initial Study, the public comment period, and notice regarding the public scoping meeting. Refer to **Appendix A1**, which is a copy of the NOP. A copy of the NOP, which included notice for the scoping meeting, was sent to residents and owners within 500 feet of the Project Site. The Notice of Intent (NOI) was published in the Federal Register on September 20, 2018. A copy of the NOI, which included notice for the scoping meeting, was sent to residents and owners within 500 feet of the Project Site.

On September 17, 2018 the following documents were sent via next-day mail to the State Clearinghouse: One original signed copy of the NOC, 15 hard copies of the summary form, a copy of the NOI, a copy of the NOP, and 15 CDs with an electronic version of the Initial Study, Initial Study Appendices, and EA. The NOP for the Project was posted on September 20, 2018 in two newspapers of general circulation in the Project area; 1) Daily News, and 2) La Opinion. Refer to **Appendix A5**, which contains the newspaper publication affidavits. A public scoping meeting for the Project was held from 5:00 p.m. - 7:00 p.m. on Thursday October 4, 2018. As part of the public distribution process for the Initial Study and EA for the proposed Project, tribal contacts were sent a copy of the NOP and a CD with the Initial Study, EA, and Initial Study Appendices. Refer to **Appendix A4** (Agency Distribution List) for a list of tribes to whom these documents were sent.

1.10 Summary of Environmental Impacts

Table 1-1 below provides a summary of the environmental impacts of the Project evaluated in this Draft EIR. These impacts are summarized as follows:

Table 1.0-2
SUMMARY OF IMPACTS UNDER THE PROJECT

Environmental Issue	Project Impact
1. **AESTHETICS**	
Scenic Vistas	No Impact
Visual Character[1]	
Construction	**Significant and Unavoidable with Mitigation**
Operation	**Significant and Unavoidable with Mitigation**
Shading	Less Than Significant
Light/Glare	Less Than Significant
2. **AIR QUALITY**	
Construction	
Regional Emissions	Less Than Significant
Localized Emissions	Less Than Significant
Toxic Air Contaminates	Less Than Significant
Operation	
Regional Emissions	Less Than Significant
Localized Emissions	Less Than Significant
Toxic Air Contaminates	Less Than Significant
3. **BIOLOGICAL RESOURCES**	
Construction	Less Than Significant with Mitigation
Operation	**No Impact**
4. **CULTURAL RESOURCES**	
Historical Resources[2]	**Significant and Unavoidable with Mitigation**
Archaeological Resources	Less Than Significant
5. **GEOLOGY AND SOILS**	
Soil Erosion	Less Than Significant
Subsidence	Less Than Significant
Collapsible Soils	Less Than Significant with Mitigation
Expansive Soils	Less Than Significant with Mitigation
Paleontological Resources	Less Than Significant with Mitigation
6. **GREENHOUSE GAS EMISSIONS**	Less Than Significant
7. **HAZARDS AND HAZARDOUS MATERIALS**	
Construction (transport/use/disposal, schools)	Less Than Significant

Environmental Issue	Project Impact
Construction (lead in soil and radon)	Less Than Significant with Mitigation
Operation	Less Than Significant
8. **LAND USE AND PLANNING**	
Land Use Compatibility	No Impact
Land Use Consistency	Less Than Significant
9. **NOISE**	
Construction	
On-Site Noise	**Significant and Unavoidable with Mitigation**
Off-Site Noise	**Significant and Unavoidable with Mitigation**
On-Site Vibration (Building Damage)	Less Than Significant
On-Site Vibration (Human Annoyance)	Less Than Significant
Off-Site Vibration (Building Damage)	Less Than Significant
Off-Site Vibration (Human Annoyance)	Less Than Significant
Operation	Less Than Significant
10. POPULATION AND HOUSING	Less Than Significant
11. **PUBLIC SERVICES**	
Fire Protection	
Construction	Less Than Significant
Operation	Less Than Significant
Police Protection	
Construction	Less Than Significant with Mitigation
Operation	Less Than Significant with Mitigation
Schools	
Construction	Less Than Significant
Operation	Less Than Significant
Recreation and Parks	
Construction	Less Than Significant with Mitigation
Operation	Less Than Significant
Libraries	
Construction	Less Than Significant
Operation	Less Than Significant
12. TRANSPORTATION	
Construction	Less Than Significant with Mitigation
Operation	
Intersection Levels of Service	Less Than Significant
Public Transit	Less Than Significant
Access and Circulation	No Impact
Bicycle. Pedestrian, and Vehicular Safety	No Impact
Parking	No Impact
13. TRIBAL CULTURAL RESOURCES	Less Than Significant
14. **WILDFIRE**	
Construction	Less Than Significant
Operation	Less Than Significant
15. **ENERGY**	
Energy Use	
Construction	Less Than Significant
Operation[3]	Less Than Significant
Infrastructure Capacity	
Construction	Less Than Significant
Operation	Less Than Significant

Notes:

Environmental Issue	Project Impact

[1]As detailed in Section 4.1 of this document, aesthetic impacts due to impacts on historical resources would be significant and unavoidable.
[2]As detailed in Section 4.4 of this document, project impacts and cumulative impacts on historical resources would be significant and would be cumulatively considerable.
[3]As discussed in Section 4.15 of this DEIR, compared to existing conditions, overall Project energy use will increase but Project per capita energy use will decrease due to energy-efficient Project Design Features.
Source: UltraSystems, 2019.

1.10.1 Less Than Significant

1.10.1.1 Aesthetics

Shading

As discussed in detail in **Section 4.1** of this Draft EIR, shadows produced by the Project would not impact adjacent land uses because the furthest extent of shadows offsite (on December 21st at 3:00 p.m.) would not fall on any buildings located east of the Project Site. Shadows would fall onto the sidewalk located on the eastern side of McKenzie Avenue and would not impact the building located at the southeast corner of McKenzie Avenue and Browne Avenue.

In summary, the Project would have a less than significant impact regarding generation of shade and shadow on adjacent land uses and structures.

Light and Glare

As discussed in detail in **Section 4.1** of this Draft EIR, the Project proposes new lighting that is energy efficient and that would shield light from spilling offsite. Glare could be produced from glass windows, and from parked cars, however the Project would not result in significant glare impacts because it does not propose highly reflective building materials.

In summary, the Project would be required to comply with the City of Los Angeles Municipal Code lighting requirements (Chapter 1 [Article 2, § 12.21-A,5(k), Article 7, § 17.08-C, and Article 4.4, § 14.4.4(E)] and Chapter 9, Article 3, § 93.0117(b)). The Project would have a less than significant impact related to lighting and glare.

1.10.1.2 Air Quality

Applicable Air Quality Plans

As discussed in **Section 4.2**, the South Coast 2016 AQMP incorporates land use assumptions from local General Plans ("GPs") and regional growth projections developed by the SCAG to estimate stationary and mobile air emissions associated with projected population and planned land uses. If the proposed land use is consistent with the local GP, then the impact of the Project is presumed to have been accounted for in the AQMP. This is because the land use and transportation control sections of the AQMP are based on the SCAG regional growth forecasts, which incorporates projections from local GPs. The proposed Project would not change the GP designation; therefore, the land use would continue to be consistent with the local GP and the impacts of the Project are still accounted for in the AQMP.

Another measurement tool in evaluating consistency with the AQMP is to determine whether a Project would generate population and employment growth and, if so, whether that growth would exceed the growth rates forecasted in the AQMP and how the Project would accommodate the expected increase in population or employment. The Project would be consistent with the growth projections in both the AQMP and the 2016-2040 RTP/SCS. This means that the plans took into account developments such as the Project in their modeling and analyses and the 2016-2040 RTP/SCS vehicle trip and VMT reduction goals and policies. Since these growth assumptions are built into the 2016 AQMP demonstration of attainment with NAAQS and CAAQS, it is also expected that the Project would not delay the attainment of those standards.

In summary, the Project would create minimal increase in population and overall VMT, which would be included in the growth rates forecasted in the AQMP.

Contribution to Cumulative Emissions

The Project would not exceed any of the SCAQMD daily criteria pollutant thresholds. In general, cumulative *regional* impacts of construction and operation of all projects in the SCAB at any given time are accounted for in the AQMP. The proposed Project is compliant with the AQMP, so the incremental contribution of the Project would not be cumulatively considerable. The only cumulative impacts with the potential for significance would be localized impacts during construction. The analysis in **Section 4.2.4.1 c)** of this document shows that localized impacts from the Project would be less than significant and therefore would not contribute to a cumulative impact.

In summary, Project impacts related to consistency with applicable air quality plans would be less than significant and the Project would have less than significant localized impacts.

Pollutants and Toxic Air Contaminants

Construction

Phase I construction activity is expected to begin in March 2021 and take approximately 18 months to complete and Phase II is expected to begin in December 2022 and take approximately 19 months to complete. The Project is proposed to be fully operational in 2024. All construction emissions associated with the Project would be below the regional significance thresholds.

In summary, Project construction emissions would be less than significant.

Operation

For each criteria pollutant, net operational emissions would be below the pollutant's SCAQMD significance threshold. In addition, ROG and NO_x emissions would decrease from existing levels. Therefore, operational criteria pollutant emissions would be less than significant.

In summary, operational criteria pollutant emissions would be less than significant.

Sensitive Receptors

Although sensitive receptors would be exposed to diesel exhaust from construction equipment, which has been associated with lung cancer (OEHHA, 1998), the duration of exposure would not be sufficient to result in a significant cancer risk.

CO Hotspots

The Project does not trigger the need for a detailed CO hotspots model and would not cause any new or exacerbate any existing CO hotspots.

Odors and Dust

Construction activities for the proposed Project would generate airborne odors and dust associated with the operation of construction vehicles (i.e., diesel exhaust), asphalt patching operations, and the application of paints and coatings. These emissions would occur during daytime hours only and would be isolated to the immediate vicinity of the construction site and activity. Therefore, they would not affect a substantial number of people.

In summary, impacts related to air quality during Project construction would be less than significant. Operational criteria pollutant emissions would be less than significant. Emissions of no criteria pollutant would exceed its threshold for significance. Therefore, localized air pollution impacts from construction activity would be less than significant. Impacts related to localized mobile-source CO emissions are considered less than significant. The impact of odors would be less than significant.

1.10.1.3 Cultural Resources

Archaeological Resources

As discussed in **Section 4.4**, no prehistoric or historic archaeological resources were observed during the pedestrian field survey. The fully-built environment of the Project Site, the elevation of the Project Site relative to adjacent roads suggesting that ground here has been significantly cut and filled, and the high degree of disturbance associated with the construction of the buildings currently present within the Project Site, any subsurface archaeological features have likely been destroyed. The potential for subsurface cultural and or historical deposits is minimal based on the findings. Therefore, impacts to archaeological resources would be less than significant.

Nonetheless, in an effort to take into account the effect of the project on potential archaeological resources, the project will be subject to a condition of approval **(CUL-COA-1)** as an additional means of protection for the inadvertent discovery of an archaeological resource. This COA is dicussed in **Section 4.4.3** of this Draft EIR.

In summary, Project impacts to archaeological cultural resources during Project construction and operation would be less than significant.

1.10.1.4 Geology and Soils

As discussed in **Section 4.5**, the Project would have less than significant impacts under thresholds regarding rupture of a known earthquake fault, slope stability/landslides, soil erosion, liquefaction, subsidence due to withdrawal of fluids or gases, and soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems.

The Project Site is not located within a state-designated Alquist-Priolo Earthquake Fault Zone or a city-designated Preliminary Fault Rupture Study Area for surface fault rupture hazards. No active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the site. The topography within the Project Site is relatively flat. The site is not located within

an area of known ground subsidence. No known large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at the site or in the general site vicinity. The liquefaction analysis indicated that the alluvial soils below the historic high groundwater level are not susceptible to liquefaction or lateral spreading. Furthermore, during construction of the Project, wind and water erosion would be minimized by implementation of best management practices, described in the required SWPPP, that are intended specifically to avoid or minimize erosion by wind and water during the construction process to maintain compliance with the required Construction General Permit (Order 2009 009 DWQ, as amended). Potential impacts resulting from wind and water erosion during construction would therefore be less than significant. Upon completion of the Project, the Project Site would be covered by permeable and impervious surfaces (e.g., new apartments, parking areas, walkways) and the remainder would be covered in landscape vegetation, all of which would prevent or minimize the potential for wind and water erosion. The post-construction impact resulting from wind and water erosion would be less than significant.

1.10.1.5 Greenhouse Gas Emissions

Generate Greenhouse Gas Emissions, Either Directly or Indirectly

As discussed in **Section 4.6**, The SCAQMD proposes that if a project generates GHG emissions below 3,000 MT CO_2e per year, it could be concluded that the project's GHG contribution is not "cumulatively considerable" and is therefore less than significant under CEQA. **Table 4.6-3** in **Section 4.6** demonstrates that the Project will have a less than significant cumulative effect. In addition, GHG emissions per dwelling unit will decrease from 14.26 to 9.93 MT CO_2e per unit per year.

In summary, Project impacts related to GHG emissions would be less than significant.

Conflict with an Applicable Plan, Policy or Regulation Adopted for The Purpose of Reducing the Emissions of Greenhouse Gases

To address the issues of climate change, the City implemented the LA Green Plan, which outlines the goals and actions that the City has established to reduce the generation and emission of GHGs from public and private activities. The LA Green Plan has the goal of reducing emissions of CO_2 to 35% below 1990 levels by the year 2030. To achieve this goal, the City is increasing the generation of renewable energy, improving energy conservation and efficiency, and changing transportation and land use patterns to reduce dependence on automobiles.

The City has also established the Los Angeles Green Building Code, which contains both mandatory and voluntary green building measures for the reduction of GHG emissions through energy conservation. The Los Angeles Green Building Code requires projects to achieve a 20% reduction in potable water use and wastewater generation, meet and exceed Title 24 Standards. The Project would comply with the Los Angeles Green Building Code, which is based on the 2016 California Green Building Standards Code (CalGreen) (Part 11 of Title 24, California Code of Regulations). The Project includes energy conservation measures (or Project Design Features) for energy efficiency, water conservation, and air quality that are beyond the minimum requirements of the Los Angeles Green Building Code.

In summary, the Project does not conflict with any of the proposed actions addressed in the LA Green Plan and the LA Green Building Code that allows the City to meet their goals, therefore the Project impacts related to conflict with policies for reduction of GHG emissions would be less than significant.

1.10.1.6 Hazards and Hazardous Materials

Hazardous Materials Transport, Use, or Disposal

As discussed in **Section 4.7**, construction and operation of the Project would involve transport, storage, and use of chemical agents, solvents, paints, and other hazardous materials. Chemical transport, storage, and use would comply with RCRA, CERCLA, OSHA, California hazardous waste control law,[1] Division of OSHA, SCAQMD, Los Angeles County Department of Public Health and LAFD requirements.

Construction

Construction, onsite maintenance, and operation of the Project would involve storage and use of small amounts of commercially-available janitorial and landscaping supplies. These materials would be used, stored, handled, and disposed of in accordance with applicable regulations.

In summary, compliance with federal, state, and local regulations regarding the routine transport, use, or disposal of hazardous materials would minimize or avoid impacts related to hazardous materials.

Operation

Compliance with federal, state, and local regulations regarding the routine transport, use, or disposal of hazardous materials would minimize or avoid impacts related to hazardous materials.

In summary, it is not anticipated that the Project would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials and impacts would be less than significant.

Emit Hazardous Emissions or Handle Hazardous Materials Within One-Quarter Mile of a School

Construction

Our Lady of Guadalupe School (TK – 8) is located approximately 50 feet east of the Project Site. The Project is anticipated to store and use products such as fuel, cleaning products, etc. during the construction phase. While the Project is within 0.25 mile of an existing school, removal of ACM, LBP, or lead in plumbing components and/or water supply lines will be completed in accordance with all applicable laws and would not result in a potential hazard.

In summary, the Project would result in less than significant impacts at any existing or proposed schools within 0.25 mile of the Project Site.

Operation

Upon Project buildout, it is anticipated that residents could store small amounts of potentially hazardous substances such as cleaning products. Onsite maintenance may include the use and storage of pest and weed control substances, which would be stored and used per applicable laws

1 Codified in California Health and Safety Code, Division 20, Chapter 6.5, Hazardous Waste Control.

and regulations. These commercially available janitorial and landscaping supplies during operation would not be used in quantities sufficient to cause a potential hazard. The limited quantities of hazardous materials, as described above, are unlikely to pose a risk to schools in the Project vicinity. Furthermore, occupancy of the proposed residential development would not cause hazardous substance emissions or generate hazardous waste.

In summary, the Project would result in less than significant impacts at any existing or proposed schools within 0.25 mile of the Project Site.

1.10.1.7 Land Use and Planning

Land Use Consistency

As discussed in **Section 4.8**, the Project Site has a current zoning designation for single-family residential development. Therefore, the existing Rose Hill Courts development is a legal non-conforming land use because the existing development has multi-family housing units. The Project proposes multi-family development that is a Public Benefit approval under Los Angeles Municipal Code § 14.00.B. Additionally, the Project is requesting an Affordable Housing Density Bonus (SB 1818) as identified in LAMC § 12.22 A.25. The request from the applicant is to allow a Density Bonus project with off menu incentives. Providing a PUB as well as a Density Bonus would allow for the Project to be constructed without a General Plan Amendment from the City of Los Angeles. Based on policy consistency analysis provided in the tables in **Section 4.8** the Project would be substantially consistent with applicable state, regional and local plans, goals, objectives and policies that govern development in the Project area.

In summary, impacts related to land use consistency would be less than significant.

1.10.1.8 Noise

Temporary or Permanent Increase in Ambient Noise

Operation

As discussed in **Section 4.9**, noise impacts associated with Project operations would be long-term impacts. Long term noise impacts include Project-generated onsite and offsite operational noise sources. Onsite (stationary) noise sources would include operation of mechanical equipment such as air conditioners, landscape and building maintenance. Offsite noise would be attributable to Project-induced traffic, which would cause an incremental increase in noise levels within and near the Project vicinity.

In summary, the Project would replace the existing buildings, and it would increase the number of residents. However, the Project would not introduce major new onsite noise sources or bring existing noise sources closer to sensitive receivers. Therefore, there would be no change in exposure to the community and the impact would be less than significant.

Excessive Groundborne Vibration or Noise

As discussed in **Section 4.9**, it is expected that ground borne vibration from Project construction activities would cause only intermittent, localized intrusion. The Project's construction activities most likely to cause vibration impacts are:

- Heavy Construction Equipment: Although all heavy, mobile construction equipment has the potential of causing at least some perceptible vibration while operating close to buildings, the vibration is usually short term and is not of sufficient magnitude to cause building damage. It is not expected that heavy equipment such as large bulldozers would operate closely enough to any sensitive receivers to cause vibration impact.

- Trucks: Trucks hauling building materials to construction sites can be sources of vibration intrusion if the haul routes pass through residential neighborhoods on streets with bumps or potholes. Repairing the bumps and potholes almost always eliminates the problem.

The vibration level of construction equipment at the nearest sensitive receiver (95 feet) is at most 0.0103 inch per second, which is less than the FTA damage threshold of 0.12 inch per second PPV for fragile historic buildings, and 69 VdB, which is less than the FTA threshold for human annoyance of 80 VdB.

In summary, vibration impacts during construction would therefore be less than significant, and no mitigation is necessary. Residential operations do not involve sources that cause substantial ground borne vibration. Therefore, the Project would not result in long term significant impacts due to ground borne vibration or noise levels

1.10.1.9 Population and Housing

Displace People or Housing

As discussed in **Section 4.10**, The Project would demolish existing residential structures on the Project Site in two phases. During Phase I, 20 units and an administration building would be demolished and during Phase II, 80 units would be demolished. At Project completion, the Project Site would contain 185 dwelling units.

The Project would demolish existing residential structures on the Project Site in two phases. Residents of the buildings demolished during Phase I would be relocated in accordance with an approved Relocation Plan. After Phase I construction activities are completed, residents of buildings planned for demolition during Phase II would relocate to the newly constructed dwelling units or permanently relocate offsite.

Before any resident relocation occurs, HUD must approve the Project's Relocation Plan, which is currently under development (49 CFR 24 Subpart C). Consistent with HUD regulations for the treatment of itinerants, current residents who are in good standing will have the option to return to the property after construction is complete. Residents living within the footprint of Phase I who wish to return, will be temporarily relocated until construction of the buildings is complete. Residents will be provided relocation counseling, compensation for moving expenses, and provided with decent, safe and sanitary housing choices. Additionally, the Relocation Plan will be considered by the Board of Commissioners and HUD, prior to any development.

In summary, impacts associated with the displacement of people would be less than significant.

1.10.1.10 Public Services

Fire Protection

Construction

As discussed in **Section 4.11.a**, during Phase I of Project construction, fewer persons would be living at the Project Site, compared to existing conditions, which would incrementally decrease the demand on fire services. Once Phase I of Project construction is complete, residents would move into the Phase I construction, which would be built in compliance with current City of Los Angeles fire codes.

In summary, the Project would have less than significant impacts on fire protection services during Project construction.

Operation

As discussed in **Section 4.11.a**, the Project Site is served by Station No. 47 located approximately 0.25 mile south of the Project Site. The current response time of Station No. 47 to the Project area (El Sereno) is five minutes and twelve seconds (LAFD, 2019). Based on the response distance criteria specified in LAMC 57.09.07A and the relatively short distance from Fire Station No. 47 to the Project Site, fire protection response is considered adequate to serve the Project Site. Additionally, the Project would be constructed with automatic sprinklers, where required by code.

Furthermore, the adequacy of existing water pressure and water availability in the Project area will be verified by the LAFD during the plan check review process. Compliance with the Los Angeles Building Code and LAFD standards is mandatory and routinely conditioned upon projects when they are approved. The LAFD will review the development plans in order to ascertain the nature and extent of any additional requirements. The Project, once operational, will be periodically inspected by the Fire Department**.**

In summary, the Project would have less than significant impacts regarding fire protection, with compliance with applicable codes and recommendations of the LAFD.

Schools

Construction

As discussed in **Section 4.11.c**, due to the temporary nature of construction jobs and the anticipation that construction workers would not likely relocate their households due to construction job opportunities presented by the Project, construction employment generated by the Project would not result in an increase in the resident population or corresponding demand for schools in the project area. Impacts on school facilities during Project construction would be less than significant.

In summary, the Project would have less than significant construction impacts regarding schools.

Operation

As discussed in **Section 4.11.c**, the Project is estimated to generate approximately 78 new students consisting of 42 elementary school students, 12 middle school students, and 24 high school students. Based on existing enrollment and capacity data from LAUSD, Glen Alta Elementary, Woodrow Wilson High School, and Abraham Lincoln High School would not have adequate capacity to accommodate the new students generated by the Project under existing conditions. However, projected future enrollment capacity shows that there would be a decrease in the elementary seating shortage and a projected seating overage and no projected overcrowding in the high schools.

Pursuant to SB 50, prior to the issuance of a building permit, the project proponent would be required to pay development fees to the LAUSD. Pursuant to Government Code § 65995, the payment of these fees is considered full and complete mitigation of Project-related school impacts. Therefore, payment of the applicable development school fees to the LAUSD would offset the potential impact of additional student enrollment at schools that would serve the Project Site. Therefore, with adherence to SB 50, project impacts on schools would be less than significant and mitigation measures would not be required.

In summary, the Project would have less than significant operational impacts regarding schools.

Recreation and Parks

Operation

As discussed in **Section 4.11.d**, the Project would result in a net increase of 85 housing units and 435 more residents, which could increase the demand for park services. This increase in the residential population would increase the use of recreational facilities, however, the Project would include common indoor space, common outdoor space, and private open space, as well as landscaped area. The Project increase in population and associated demand on recreational facilities and open space over existing conditions would be small, and the Project's contribution to use of recreational facilities and open space would not require the construction or expansion of recreational facilities that would result in adverse physical effects on the environment. The Project would be subject to fees such as school, parks/recreation, library, and sewer impact fees. Where applicable, the Project applicant will apply for exemptions and/or reduced fees.

In summary, the Project would pay any required Quimby in lieu fees for required park space as permitted under LAMC § 12.33. In addition, Project Design Feature Recreation and Parks **PDF-1** would implement public involvement and a mutually beneficial partnership between park programs, operations, and improvements in the community. Regardless of whether the Project is exempt from fees or if fees are paid the ample amount of Project open space and recreational amenities proposed on the Project Site, would more than satisfy the City's park and open space requirements for the Project and impacts would be less than significant.

Libraries

Construction

As discussed in **Section 4.11.e**, During Phase I of Project construction, fewer persons would be living at the Project Site, compared to existing conditions, however no impact on library facilities would occur during either Phase I or II of Project construction.

In summary, Project construction would not result in any impacts on library facilities.

Operation

As discussed in **Section 4.11.e**, the Project would develop 89 units in the first phase of development and 96 units in the second phase of development, resulting in a total of 185 units with an anticipated total population of 656 residents, which there would be 435 more residents, compared to January 2019 conditions. While it is likely that closest LAPL branches currently serving the Project

Site would be used by the future residents, it is not expected that any one library or branch would be the focus of the demand.

In summary, the Project increase in population and associated demand on existing libraries over existing conditions would be small, and the Project's contribution to library use would not cause substantial degradation of existing facilities or require new or expanded libraries. Impacts related to libraries would be less than significant.

1.10.1.11 Transportation

CEQA Guidelines section 15064.3, subdivision (b)

As discussed in **Section 4.12**, the analysis provided in the traffic report prepared for the Project utilizes volume to capacity ratios and level of service standards to determine Project significance. On July 30, 2019, the City of Los Angeles adopted vehicle miles traveled (VMT) as a criteria in determining transportation impacts under the State's California Environmental Quality Act (CEQA). This adoption was required by Senate Bill (SB) 743 and the recent changes to Section 15064.3 of the CEQA Guidelines. It is anticipated that the Project will receive its entitlements prior to July 1, 2020 so a full VMT analysis is not provided in the traffic report or in this Draft EIR. However, since public transportation will still be available to the residences at the site, impacts to transportation based on vehicle miles travelled are expected to be less than significant.

The traffic study followed the traffic study guidelines of LADOT. Prior to the start of the traffic study, KOA coordinated with staff from LADOT to obtain consensus on the traffic scope, methodology and assumptions. A Memorandum of Understanding was prepared and reviewed by LADOT staff and executed for the Project. Accordingly, this EIR analyzed the Project's traffic impacts pursuant to the LADOT Guidelines in effect at the time of the approved MOU.

In summary, impacts in this regard would be less than significant.

Operation

Intersection Levels of Service

As discussed in **Section 4.12**, existing and future traffic conditions with the Project were analyzed at signalized intersections Topaz Street & Huntington Drive, Monterey Road & Huntington Drive, Monterey Road & Huntington Drive North/Browne Avenue. For existing conditions with the Project, it was determined that all of the study intersections would continue to operate at LOS D or better during both AM and PM peak hours. The Project would not create significant traffic impacts at any of the study intersections under existing with-Project conditions. For future conditions with the addition of Project-generated traffic, the intersection of Monterey Road and Huntington Drive would continue to operate at LOS E during the AM peak hour. Therefore, the Project would not create significant traffic impacts at any of the study intersections under existing or future conditions with the Project.

The four intersections included in KOA's traffic study for the examination of potential neighborhood traffic impacts of the Project are either adjacent to the Project Site, or on the route between the site and the nearest arterial. These intersections were analyzed in generally the same manner as the primary study intersections, but these locations are not controlled by traffic signals but by stop signs on the minor approaches. As the vehicle delay at these intersections does not reach LOS E or F in the

future without- Project or future with-Project periods, additional signal warrant analysis was not conducted. It was determined that the Project would not create significant traffic impacts at any of the neighborhood intersections under existing or future conditions with the Project.

In summary, the Project would not have a significant impact to existing traffic conditions or projected future traffic conditions at signalized intersections or neighborhood intersections.

Public Transit

Public transit services in the vicinity of the Project Site are provided by Metro. Metro bus Lines 78, 79, 378, 252, and 256 operate in the Project area. Metro Line 252 is located adjacent to the Project Site, along Mercury Avenue, with bus stops near the intersections of Mercury Avenue and McKenzie Avenue and Mercury Avenue and Boundary Avenue.

In total, Metro Line 252, which is only one of the five bus lines to operate in the Project area, stops 66 times at the Huntington and Monterey stop Monday-Friday and 44 times a day on Saturdays, Sundays, and holidays. Due to the numerous stops this line makes, in addition to the stops that the other four lines in the Project vicinity make, the addition of approximately 435 people would not create a significant increase in transit demand because the persons from the Project Site using the Metro bus lines would utilize multiple bus lines and a variety of different hours, which would distribute the demand on the bus line such that not all 435 people would need to use the nearest bus stop at any one time.

The Project also proposes alternative transportation by providing long-term and short-term bicycle parking, as described earlier in this section. Therefore, based on the above, operation of the Project would not affect the transit route or bus facilities, and not conflict with any plans or policies related to these travel modes. After Project construction is complete, the Project would not conflict with existing policies, plans, or programs supporting alternative transportation.

In summary, the Project would not have a significant impact with regards to public transit services.

Emergency Access

As discussed in **Section 4.12**, the Project Site plan will be reviewed by the Los Angeles Fire Department and the Project complies with all emergency access and sight line requirements. Therefore, the Project would not result in inadequate emergency access during operation and no impacts would occur.

In summary, there would be less than significant Project operational impacts regarding emergency access.

1.10.1.12 Tribal Cultural Resources

Substantial Adverse Change in the Significance of a Tribal Cultural Resource- Listed or Eligible for Listing in the CRHR

As discussed in **Section 4.13**, in compliance with AB 52, notice regarding this Project was mailed by HACLA on September 11, 2018 to the tribes on the City's Planning Department AB 52 contact list. These were the Fernandeño Tataviam Band of Mission Indians (FTBMI), the Gabrielino/Tongva San Gabriel Band of Mission Indians, the Gabrieleño Band of Mission Indians – Kizh Nation, the

Gabrielino - Tongva Tribe, the Gabrielino/Tongva Nation, and the San Fernando Band of Mission Indians. Mr. Jairo Avila, the Tribal Historic and Cultural Preservation officer for the FTBMI, responded by email to Dhiraj Narayan of HACLA on September 13, 2018. Mr. Avila stated that the "project is out of the FTBMI's ancestral Tribal boundaries" and would defer consultation to members of the Gabrieleno Indian Tribe. On September 14, 2018, Mr. Andrew Salas, Chairperson of the Gabrieleño Band of Mission Indians – Kizh Nation, sent a letter to HACLA via email requesting consultation on the project. (See **Appendix I3**.) The remaining four tribes did not respond to the lead agency within the thirty-day period to request consultation, nor have they responded to date.

Based upon the record search, HACLA has determined that no substantial evidence exists to support a conclusion that the Project may cause a significant impact on tribal cultural resources. However, in an effort to cooperate with the Gabrielino Band of Mission Indians - Kizh Nation, HACLA would include a condition of approval as an additional means of protection for the inadvertent discovery of tribal cultural resources.

In summary, impacts to tribal cultural resources would be less than significant.

Substantial Adverse Change in the Significance of a Tribal Cultural Resource That is Determined to be A Significant Resource to a California Native American Tribe

As discussed in **Section 4.13**, There is no substantial evidence that TCRs, as defined by criteria set forth in PRC § 5024.1(c), are present on the Project Site. The Project would have less than significant impacts on TCRs as defined in PRC § 5024.1(c). Project impacts on unknown TCRs as defined in PRC § 5020.1(k) would be less than significant. The Project's condition of approval, nevertheless, would ensure that potential previously unknown TCRs are protected, evaluated, and recovered as determined by a qualified cultural resources expert and Native American representative.

In summary, impacts to tribal cultural resources would be less than significant.

1.10.1.13 Wildfire

Impair an Adopted Emergency Response Plan

Construction

As discussed in **Section 4.14**, Review of Los Angeles County Disaster Routes Map for the City of Los Angeles (Los Angeles County Department of Public Works, 2013) shows that the Project Site is not accessed by a road designated as a disaster route. However, a portion of Huntington Drive, located within 1,000 feet southeast of the Project Site, is a designated disaster route. With adherence to regulatory requirements and implementation of a Construction Management Plan, construction of the Project would not impair implementation of, or physically interfere with, any adopted or onsite emergency response or evacuation plans.

In summary, there would be no impacts related to emergency response and evacuation during construction.

Operation

During operation, the Project would not involve any activities that would impede public access or travel along the public right-of-way or interfere with an adopted emergency response or evacuation

plan. The Project Site plan will be reviewed by the Los Angeles Fire Department and the Project complies with all emergency access and sight line requirements. Therefore, the Project would not result in inadequate emergency access during operation and no impacts would occur.

In summary, there would be no impacts associated with emergency response and emergency evacuation plans. The Project's proposed land uses would not require a new, or interfere with an existing risk management, emergency response, or evacuation plan, and no impacts are anticipated.

Expose Project Occupants to, Pollutant Concentrations from a Wildfire

As discussed in **Section 4.14**, the Project would not require the installation or maintenance of infrastructure that may exacerbate fire risk because it is an infill development project in an already urban and developed portion of the City of Los Angeles, and therefore would not require installation of infrastructure that would exacerbate fire risks. The Project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides related to post fire instability because the Project Site is not located on a steep slope or hillside and has been designed with the topography of the site and surrounding areas in mind.

In summary, with compliance with all applicable regulations, the Project would have less than significant impacts related to risk of loss, injury or death involving wildland fires.

Exacerbate Fire Risk

As discussed in **Section 4.14**, The existing buildings onsite have no fire suppression sprinklers. The Project would not exacerbate wildfire risks because the Project would include required fire suppression design features (i.e., fire-resistant building materials, where appropriate, smoke detection and fire alarm systems, automatic sprinkler systems (in compliance with all applicable City and Fire codes), portable fire extinguishers, and emergency signage in all buildings, and required brush clearance), identified in the latest edition of the California Building Code.

In summary, with compliance with all applicable regulations, the Project would have less than significant impacts related to risk of loss, injury or death involving wildland fires.

Expose People or Structures to Significant Risks

As discussed in **Section 4.14**, the Project would be required to comply with City of Los Angeles Building Code and safety regulations pertaining to development in a very high fire hazard severity zone. Per the 2017 Los Angeles City Fire Code, Section 301, the provisions of that chapter shall govern the occupancy and maintenance of all structures and premises for precautions against fire and the spread of fire and general requirements of fire safety (ICC Public Access, 2018). The Project is required to comply with all applicable chapters of the City of Los Angeles Fire Code, including but not limited to Section 315, General Storage, regarding storage of combustible materials, Chapter 6, Building Services and Systems, Chapter 7, Fire and Smoke Protection Features, and Chapter 9, Fire Protection Systems (ICC Public Access, 2018). Therefore, the new buildings would include materials and fire safety features that would be more fire resistant and safer than the existing buildings.

In summary, with compliance with all applicable regulations, the Project would have less than significant impacts related to risk of loss, injury or death involving wildland fires.

1.10.1.14 Energy

Energy Use

Environmental Impact Due to Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

In evaluating potential energy impacts, it is necessary to take into account certain project design features that would reduce energy use. These were introduced in the analysis of greenhouse gas emissions, in **Section 4.6.3.3**. These design features will help ensure that the project will not have "wasteful, inefficient, or unnecessary consumption of energy resources," during project construction or operation.

Construction

Lighting

As discussed in **Section 4.15**, during Project construction, energy would be consumed in the form of electricity associated with the conveyance and treatment of water used for dust control and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. The Project would comply with all applicable regulations and codes which require achievement of various levels of energy efficiency in building construction, design and operation.

Natural Gas

As discussed in **Section 4.15**, construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Therefore, the Project is not anticipated to have a demand for natural gas during Project construction.

Transportation Energy

As discussed in **Section 4.15**, Project construction would consume energy in the form of petroleum-based fuels associated with the use of offroad construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, and delivery and haul truck trips hauling solid waste from and delivering building materials to the Project Site. During Project construction, trucks and construction equipment would be required to comply with ARB's anti-idling regulations. ARB's In-Use Off-Road Diesel-Fueled Fleets regulation would also apply. Vehicles driven to or from the Project Site (delivery trucks, construction employee vehicles, etc.) are subject to fuel efficiency standards requirements established by the Federal Government.

In summary, Project construction activities regarding fuel use would not result in wasteful, inefficient, or unnecessary use of energy and impacts would be less than significant.

Operation

Electricity

As discussed in **Section 4.15**, under the Project, all the existing buildings would be demolished and 185 new housing units would be built, along with a community building, landscaping, and recreational amenities. The Project would comply with all applicable regulations and codes which

require achievement of various levels of energy efficiency in building construction, design and operation.

Natural Gas

As discussed in **Section 4.15**, there would be an approximately 8 percent increase in per household natural gas use associated with operations of the Project, compared to existing conditions. This reflects efficiencies achieved by Title 24 and other energy reducing regulations and programs.

Transportation Energy

As discussed in **Section 4.15**, total VMT are projected to increase by about 319,235 vehicle-miles per year. However, VMT per dwelling unit are projected to decrease substantially as result of the Project. Per-household travel will be about 38 percent lower. As a result, per-unit consumption of gasoline and diesel fuels will decrease by a comparable amount.

In summary, the Project would have a less than significant impact regarding wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation.

Conflict with or Obstruct a State or Local Plan for Renewable Energy or Energy Efficiency

Construction

As discussed in **Section 4.15**, lighting used during Project construction would comply with Title 24 standards/requirements (such as wattage limitations). This compliance will ensure that electricity use during Project construction would not result in the wasteful, inefficient, or unnecessary use of energy. Lighting will be used in compliance with all City of Los Angeles Municipal Code requirements to create enough light for safety.

In summary, the Project would have a less than significant impact regarding conflict with or obstruction of a state or local plan for renewable energy or energy efficiency during Project construction.

Operation

As discussed in **Section 4.15**, under the Project, all the existing buildings would be demolished and 185 new housing units would be built, along with a community building, landscaping, and recreational amenities. The Project would comply with all applicable regulations and codes which require achievement of various levels of energy efficiency in building construction, design and operation.

In summary, the Project would have a less than significant impact regarding conflict with or obstruction of a state or local plan for renewable energy or energy efficiency during Project operation.

1.10.2 Less Than Significant with Mitigation

1.10.2.1 Biological Resources

Species Impacts

As discussed in **Section 4.3**, the Project Site is located in a highly-urbanized setting which provides low habitat value for special status plant and wildlife species. In compliance with the MBTA (see Section 4.3.2, Regulations, Plans, and Standards: Migratory Bird Treaty Act), if vegetation removal, ground disturbance, or any other construction activity is scheduled to begin during the nesting bird season (generally February 1 – August 31), mitigation measures **BR-1** and **BR-2** would be implemented, and impacts on nesting bird species protected by the MBTA would be less than significant.

In summary, no direct or indirect impacts on special-status plant or animal species would occur as a result of the Project activities because no special-status plant or animal species are located on the project site. With the implementation of mitigation measures **BR-1** and **BR-2** above, potential impacts on biological resources would be reduced to less than significant levels.

1.10.2.2 Geology and Soils (and Paleontological Resources)

As discussed in Section 4.5, the Project Site is located within a seismically active region and could be subjected to strong ground shaking in the event of an earthquake. Seismically-induced settlement may occur if an earthquake causes the dynamic compaction of dry and loose sands. Typically, settlements occur in thick beds of such soils. A seismically-induced settlement analysis was performed and the results established that the soil on the Project Site above the historic high groundwater level of 20 feet could be susceptible to approximately 0.11 and 0.14 inch, respectively, of settlement as a result of the Design Earthquake level peak ground acceleration ($\frac{2}{3}PGA_M$) and could be susceptible to approximately 0.39 and 0.38 inches, respectively, of settlement as a result of the Maximum Considered Earthquake level peak ground acceleration (PGA_M). Differential settlement at the foundation level is anticipated to be less than 0.1 inch over a distance of 20 feet (Geocon, 2019, p. 9 and 11). The existing fill at the Project Site, in its present condition, is not suitable for direct support of proposed foundations or slabs. The majority of the site is located within a zone of required investigation for liquefaction. Furthermore, the upper 5 feet of soils encountered during the investigation are considered to have a "low" to "moderate" expansive potential and are classified as "expansive" based on the 2016 CBC § 1803.5.3.

The Project would be required to comply with the plan review and permitting requirements of the Los Angeles Department of Building and Safety, including the recommendations provided in a final, site-specific geotechnical report subject to review and approval by the Los Angeles Department of Building and Safety, as set forth in mitigation measure **GEO-1.** The final recommendations from that report would be enforced for the construction of the Project. The Project would also be required to comply with the permitting requirements of the Los Angeles Building Code, which incorporates current seismic design provisions of the CBC, with City amendments, to minimize seismic impacts.

As such, with the implementation of mitigation measure **GEO-1**, impacts associated with soil erosion, subsidence, collapsible soils, expansive soils, and paleontological resources would be reduced to a less than significant level.

As discussed in **Section 4.5**, excavations that extend down into the Puente Formation, or any excavations in the Puente Formation exposed in the elevated terrain in the eastern portion of the Project Site may encounter significant to highly significant vertebrate fossil remains (McLeod 2019:3).

According to the Excavation Study for the Project (Fuscoe Engineering, 2019) included in **Appendix E** of this Draft EIR, the maximum depths of excavation for the Project would range from 8.7 feet for construction of Building E (in the southwestern portion of the Project Site) and for the infiltration gallery (at the northeast portion of the Project Site) to 29.8 feet for construction of Building C (at the northwest portion of the Project Site). Based on the planned depths of excavation on the Project Site and the potential for significant to highly significant vertebrate fossil remains to be encountered within the Puente Formation, construction of the Project may result in potentially significant impacts to paleontological resources.

With the implementation of recommended mitigation measure **PALEO-1**, impacts to paleontological resources from construction of the proposed Project would be reduced to less than significant.

1.10.2.3 Hazards and Hazardous Materials

Release of Hazardous Materials

Construction

As discussed in **Section 4.7**, the following Recognized Environmental Conditions were identified on the Project Site during the Phase 1 ESA (Altec, 2018):

Lead in soil along existing building foundations/perimeters. The most protective screening level for lead in residential soil in California is 80 mg/kg. Therefore, Altec recommends using this level for residential properties. Lead is present at concentrations above 80 mg/kg in the foundation/dripline soil around Buildings #2, #6, #7, #9, #11, #12, #13, and #14. A less conservative screening or clearance level of 1,000 mg/kg (published in California Code of Regulations Title 17 § 35036) was used for a soil removal effort performed at Rose Hill Courts in 2008; however, the Project indicated that the target property will be remediated to 80 mg/kg (Altec, 2018, p. 51) as required by HSC § 5708. For details of the lead test results, see the Revised Report for Limited Lead Testing performed by Altec, which covered paint sampling and soil sampling performed June 7, 2016 and December 5, 2016 (Altec, 2016b), which is **Appendix K2** to this EIR. With the implementation of mitigation measure **HAZ-1,** potential impacts related to lead in soil would be less than significant.

Indoor radon gas. The CGS map of Indoor Radon Potential indicates that the Project is located in an area that has a moderate potential for indoor radon gas levels at 4.0 pCi/L (CGS, 2005; Altec, 2018, p. 51). Due to the potential for indoor radon gas levels in excess of the USEPA standard of 4.0 pCi/L, testing will and mitigation may be required to reduce this potentially significant impacts related to indoor levels of radon gas upon completion of the Project. Proposed building plans would be reviewed by the City of Los Angeles to determine if additional precautions are needed to mitigate potential radon gas impacts. If radon tests indicate a potential for elevated levels of radon in existing buildings on the site, then mitigation measure **HAZ-2** would reduce potential impacts from radon.

In summary, the Project would be made compliant with federal, state, and local regulations for radon through inclusion of a radon mitigation system, if needed. With implementation of mitigation measures **HAZ-1** and HAZ-**2** above, as applicable, the Project would comply with existing local, state,

and federal regulations governing radon exposure, and impacts would be less than significant with mitigation incorporation.

1.10.2.4 Public Services

Police Protection

Construction

As discussed in **Section 4.11.b**, there is an increased possibility for trespassing, vandalism, and unattractive nuisances during the construction phase of the Project. Temporary fencing erected during the construction phase should be enough to feasibly deter such activities. Implementation of mitigation measure **PS-1** would reduce temporary construction impacts on police protection services to a less than significant level.

In summary, implementation of mitigation measure **PS-1** would reduce temporary construction impacts on police protection services to a less than significant level.

Operation

As discussed in **Section 4.11.b**, the Project will not result in a substantial increase in the population and housing of the Project area, nor is it expected to significantly affect the existing service capacity of the LAPD. The increase in residences, visitors, employee and traffic in the area would not likely significantly increase the need for additional law enforcement services. Additionally, as described in the Project Description section of this document, the Project would include exterior lighting that will be located on the buildings in addition to street, sidewalk and pathway lighting located across the entire site. The site will have security features including: cameras, controlled access to midrise buildings, and potentially controlled access to some of the parking areas. Ground rules will be established by the property management company (Related Management Company).

In summary, in response to public comments, implementation of mitigation measure **PS-2** would enhance the safety of the Project Site and would result in less than significant impacts on police protection and law enforcement services. With implementation of mitigation measures **PS-1** and **PS-2**, there would be less than significant impacts on law enforcement services during both the construction and operational phases of the Project.

Recreation and Parks

Construction

As discussed in **Section 4.11.c**, during Project construction the construction workers could potentially visit nearby parks, such as Rose Hill Park directly north of the Project Site, during their lunch breaks. However, minimal impacts would occur during Project construction because construction workers would cease to visit nearby parks after the completion of construction. Additionally, due to the scope of the proposed Project, there would not be a large number of construction workers on the Project Site. Mitigation measure **PS-3** is recommended to reduce potential impacts on nearby park/recreation access to a less than significant level.

In summary, with implementation of mitigation measure **PS-3** there would be less than significant impacts regarding access to the Rose Hill Recreation Center, Rose Hill Park, and Ernest E. Debs Regional Park during the construction phase of the Project.

1.10.2.5 Transportation

Program Plan, Ordinance or Policy Addressing the Circulation System

Construction

As discussed in **Section 4.12**, during Project demolition and construction activities, delivery truck trips and construction employee commuting could significantly contribute to traffic within the study area. For this reason, an analysis of potential traffic impacts during the Project construction period was analyzed, based on the anticipated number of hauling/delivery trucks and employee vehicle trips. The construction period trips will create a significant impact at the intersection of Monterey Road and Huntington Drive during the PM peak period. However, mitigation measures **TRANS-1** through **TRANS-3** would reduce this potential impact to a less than significant level.

In summary, mitigation measures **TRANS-1** through **TRANS-3** are recommended to reduce potential construction-related impacts on transit services to a less than significant level.

Public Transit Service

As discussed in **Section 4.12**, All bus stops in the Project vicinity are for Metro Line 252. Construction of the Project may result in temporary relocation of bus stops or rerouting of bus Line 252, as well as temporary lane closures, which would affect vehicle flow in the vicinity of the Project Site.

In summary, mitigation measure **TRANS-3** is recommended to reduce potential construction-related impacts on transit services to a less than significant level.

Project Construction Parking

As discussed in **Section 4.12**, during Project construction the Project is anticipated to temporarily reduce the number of on-street parking spaces available. Parking for construction workers would be either onsite or offsite and would only occur during construction hours in the day. Prior to construction activities, the Project applicant will prepare a construction parking management plan that details how parking will be managed during Phase I and Phase II of Project construction. The parking management plan will specify where onsite and offsite parking will be available during both phases of Project construction.

In summary, mitigation measure **TRANS-2** is recommended to ensure that temporary Project construction impacts on street parking are reduced to a less than significant level via implementation of a construction parking management plan.

Bicycle and Pedestrian Access

During construction activities, the Project has the potential to affect sidewalk accessibility. However, with implementation of mitigation measure **TRANS-3**, impacts would be reduced to a less than significant level.

In summary, with mitigation the Project would not conflict with policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities and impacts would be less than significant.

With implementation of mitigation measures **TRANS-1 through TRANS-3,** during the Project construction phase, the Project would have less than significant temporary construction-related impacts to traffic and transportation. Therefore, with mitigation the Project would not conflict with policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities and impacts would be less than significant.

Program Plan, Ordinance or Policy Addressing the Circulation System

Operation

As discussed in **Section 4.12**, Traffic impacts created by the Project were determined by comparing the Future Pre-Project conditions to the future with Project (post-Project) conditions. Even under future with-Project conditions, the proposed Project would not create any significant traffic impacts at the study intersections. Therefore, mitigation measures are not recommended under the future period (KOA, 2019, p. 28).

In summary, operation of the Project would not affect the transit route or bus facilities, and not conflict with any plans or policies related to these travel modes. After Project construction is complete, the Project would not conflict with existing policies, plans, or programs supporting alternative transportation.

Public Transit Service

In summary, operation of the Project would not affect the transit route or bus facilities, and not conflict with any plans or policies related to these travel modes.

<u>Project Operation Parking</u>

As discussed in **Section 4.12**, the Project will increase the number of onsite parking spaces per unit from 0.80 parking spaces per unit to 0.94 parking spaces per unit, which will be an increase of 0.14 parking spaces per unit available onsite. Furthermore, the Project would increase the total number of onsite and offsite parking available from between 230 and 261 parking spaces to between 315 and 344 parking spaces, for a total increase of approximately 85 additional parking spaces.

In summary, since the number of onsite and offsite parking spaces will increase after construction, which is a beneficial impact, the Project would have no adverse impacts to parking during operation.

Bicycle and Pedestrian Access

As discussed in **Section 4.12**, after Project construction is complete, with the exception of curb cuts necessary for driveways, the Project would not adversely affect sidewalks adjacent to the Project Site.

In summary, pedestrian access to the Project Site would not be significantly affected upon Project completion.

Emergency Access

Construction

As discussed in **Section 4.12**, the construction period trips will create a significant impact at the intersection of Monterey Road and Huntington Drive during the PM peak period. However, mitigation measure **TRANS-1** would reduce this potential impact to the intersection of Monterey Road and Huntington Drive to a less than significant level.

In summary, implementation of mitigation measure **TRANS-1** would avoid a significant impact being created at the intersection of Monterey Road and Huntington Drive (during the PM peak period) during the construction phase of the Project.

1.10.3 Significant and Unavoidable

1.10.3.1 Aesthetics

As discussed in **Section 4.1**, Rose Hill Courts is considered a scenic resource since the buildings are historic. The proposed demolition of the existing buildings would substantially damage a scenic resource, which would be considered a significant adverse impact. As discussed in **Section 4.4** in this DEIR, in most circumstances, the demolition of a historical resource cannot be mitigated to a less than significant level. Therefore, the Project would have a significant adverse impact to the historical buildings on the Project Site and thus would have a significant and unavoidable adverse impact to a scenic resource.

As discussed in **Section 4.4.6.1**, Mitigation Measures, Historic Architectural Resources, HACLA will implement mitigation measures **CUL-1** and **CUL-2** to comply with CEQA regarding historic cultural resources. However, the mitigation measures would not reduce potentially significant impacts on built environment resources to a less than significant level.

In summary, impacts to aesthetics with regards to the historic buildings, after implementation of mitigation measures, would remain significant and unavoidable.

1.10.3.2 Cultural Resources

Significance of a Historical Resource

As discussed in **Section 4.4**, the Project would involve the demolition of the existing Rose Hill Courts public housing complex. Rose Hill Courts is a historical resource because it was formally determined eligible for listing in the NRHP and therefore was automatically listed in the CRHR. In most circumstances, the demolition of a historical resource cannot be mitigated to a less than significant level. Rose Hill Courts would be materially impaired by the Project because it would no longer be listed in the CRHR or eligible for listing in the NRHP if it were demolished. Therefore, the Project would have a significant adverse impact on this historical resource. Though the Programmatic Agreement and mitigation measures **CUL-1** and **CUL-2** would reduce impacts related to demolition of Rose Hill Courts, no mitigation measures are available for the proposed Project that would fully reduce impacts on historical resources to a less than significant level. Therefore, this impact would be significant.

In summary, the Project would have a significant and unavoidable impact on historic resources because the Project would demolish the existing Rose Hill Courts development.

1.10.3.3 Noise

Temporary or Permanent Increase in Ambient Noise

Construction

As discussed in **Section 4.9**, noise impacts associated with the housing Project demolition and construction include short-term impacts. Construction activities, especially heavy equipment operation, would create noise effects on and adjacent to the construction site.

The combinations of pieces of equipment (see **Table 4.9-6**) in all subphases of construction would result in short-term increases in exposures of nearby sensitive receivers of more than 5 dBA. These increases are shown in **Table 4.9-7**. In Phase I, the increase over ambient would range from 9.9 to 28.1 dBA L_{eq}. In Phase II, the increase would range from 17.3 to 29.9. These increases are so big because very noisy equipment would be used near sensitive receivers in an area where ambient noise levels are normally rather low.

In summary, mitigation measures **N-1** through **N-5** would result in an appreciable decrease in exposures, but these short-term exposures would still be significant sometimes during construction. Therefore, Project impacts related to increased noise levels during construction would be significant and unavoidable after mitigation.

1.11 Project Design Features

1.11.1 Greenhouse Gas Emissions

As discussed in **Section 4.6**, the Project would comply with the Los Angeles Green Building Code, which is based on the 2016 California Green Building Standards Code (CalGreen) (Part 11 of Title 24, California Code of Regulations). The following are proposed energy conservation measures that are beyond the minimum requirements of the Los Angeles Green Building Code:

Energy Conservation and Efficiency

GHG-PDF-1: Project design will provide an energy efficiency exceeding Title 24, Part 6, California Energy Code baseline standard requirements, based on the 2016 Building Energy Efficiency Standards requirements.[2]

GHG-PDF-2: Use of high-efficiency Energy Star appliances, where appropriate.

Water Conservation

GHG-PDF-3: Inclusion of water conservation measures in accordance with the Los Angeles Department of Water and Power requirements for new development in the City of Los Angeles (e.g., high-efficiency fixtures and appliances, weather-based irrigation systems, drought-tolerant landscaping).

2 For analysis purposes, a value of 10% more efficient than Title 24 was used in the CalEEMod model.

GHG-PDF-4: Use of drought-tolerant plants and indigenous species, stormwater collection, permeable pavement wherever possible, and stormwater filtration, storage and re-use for landscaping.

GHG-PDF-5: Use of high-efficiency toilets, including dual-flush water closets, as appropriate.

GHG-PDF-6: Use of high-efficiency showerheads at 1.5 gallons per minute. Install no showers with multiple showerheads.

GHG-PDF-7: Use of weather-based irrigation controller with rain shutoff, matched precipitation (flow) rates for sprinkler heads, and rotating sprinkler nozzles or comparable technology such as drip/micro spray/subsurface irrigation where appropriate.

GHG-PDF-8: Installation of a separate water meter (or submeter), flow sensor, and master valve shutoff for irrigated landscape areas totaling 5,000 square feet and greater.

GHG-PDF-9: Use of proper hydro-zoning and turf minimization, as feasible.

Water Quality

GHG-PDF-10: Installation of pre-treatment stormwater infrastructure for the stormwater treatment system.

GHG-PDF-11: Reduce stormwater runoff through the introduction of new landscaped areas throughout the Project Site and/or on the structure.

Air Quality

GHG-PDF-12: Prohibit the use of any fireplaces in the proposed residential units.

Recreation and Parks

As discussed in **Section 4.11.d**, the comment letter from Darryl Ford (Ford, 2018) regarding the proposed Project states: "We encourage the applicant to link with nearby recreation and park facilities and consider mutually beneficial partnerships between park programs, operations, and improvements." The Project applicant is willing to explore potential partnerships with the City of Los Angeles Department of Recreation and Parks, and plans to coordinate any services provided onsite with services already provided at Rose Hill Recreation Center to avoid duplication. In response to this comment, the Project includes the following project design feature (PDF) with regard to recreation and parks:

Recreation and Parks-PDF-1:

Not less than 90 days prior to the anticipated construction completion the Project Applicant will reach out to the City of Los Angeles Department of Recreation and Parks staff responsible for the programming (if any) at various neighborhood, community, and regional parks located within a 2-mile radius of the Project Site to consider mutually beneficial partnership between park programs, operations, and improvements. These parks and recreation facilities include, but are not limited to, El Sereno Arroyo Playground, El Sereno Community Gardens, Henry Alvarez Memorial Park, Hermon Dog Park, Hermon Park, Arroyo Seco Park, Carlin G. Smith Recreation Center, Cypress Recreation

Center, Cypress Recreation Center, Downey Recreation Center, Ascot Hills Park and Charles F. Lummis Home.

1.12 Mitigation Measures

The areas requiring mitigation are:

- Aesthetics
- Biological Resources
- Cultural Resources
- Geology and Soils/Paleontological Resources
- Hazards and Hazardous Materials
- Noise
- Public Services (Police Protection, Recreation and Parks)
- Transportation

1.12.1 Aesthetics

For impacts to Historic Architectural Resources, HACLA will implement mitigation measures **CUL-1** and **CUL-2** to comply with CEQA regarding historic cultural resources. Refer to **Sections 4.1.5** and **4.4.5**.

1.12.2 Biological Resources

Mitigation Measure BR-1: Nesting Bird Surveys

If Project activities begin during nesting bird season (generally February 1 – August 31), no earlier than one week prior to ground-disturbing activities, a qualified biologist shall conduct preconstruction clearance surveys within the BSA (Project Site and a 500-foot buffer) for special-status species including nesting birds.

To maintain compliance with the Migratory Bird Treaty Act and California Fish and Game Code, and to avoid or minimize direct and indirect effects on migratory non-game nesting birds, and their nests, young, and eggs, the following measures shall be implemented.

- Project activities that will remove or disturb potential nest sites should be scheduled outside the nesting bird season, if feasible. The nesting bird nesting season is typically from February 1 through August 31, but can vary slightly from year to year, usually depending on weather conditions. Raptors are known to begin nesting early in the year and ends late. The raptor nesting bird season begins January 1 to September 15.

- If Project activities that will remove or disturb potential nest sites cannot be avoided during February 1 through August 31, a qualified biologist shall conduct a pre-construction survey for nesting birds within the limits of Project disturbance up to seven days prior to mobilization, staging and other disturbances. Preconstruction surveys shall be conducted no more than three days prior to vegetation, substrate, and structure removal and/or disturbance.

- If neither nesting birds nor active nests are observed during the pre-construction survey(s), or if they are observed and will not be affected (i.e. outside the buffer zone described below), then Project activities may begin and no further nesting bird monitoring will be required.

- If an active bird nest is located during the pre-construction survey and will potentially be affected, a no-activity buffer zone shall be delineated on maps and marked in the field by fencing, stakes, flagging, or other means up to 500 feet for raptors, or 100 feet for non-raptors. Materials used to demarcate the nests will be removed as soon as work is complete or the fledglings have left the nest. The biologist will determine the appropriate size of the buffer zone based on the type of activities planned near the nest and bird species. Buffer zones shall not be disturbed until a qualified biologist determines that the nest is inactive, the young have fledged, the young are no longer being fed by the parents, the young have left the area, or the young will no longer be affected by Project activities. Periodic monitoring by a biologist will be performed to determine when nesting is complete. After the nesting cycle is complete, Project activities may begin within the buffer zone.

Mitigation Measure BR-2: Biological Monitor

- If special-status wildlife species or protected nesting birds are observed and determined present within the BSA during the pre-construction breeding bird surveys, then the applicant shall retain a qualified Biological Monitor to conduct biological monitoring during construction activities. The qualified Biological Monitor shall be onsite to monitor throughout the duration of construction activities that result in tree or vegetation removal, to minimize the likelihood of inadvertent impacts on nesting birds and other wildlife species. Monitoring shall also be conducted periodically during construction activities to ensure no new nests occur during vegetation removal or building demolition activities between February 1 through August 31. The Biological Monitor shall ensure that biological mitigation measures, best management practices, avoidance, and protection measures described in the relevant Project permits and reports are in place and are adhered to.

- The Biological Monitor shall have the authority to halt all construction activities and all non-emergency actions if sensitive species and/or nesting birds are identified and would be directly impacted. The monitor will notify the appropriate resource agency and consult if needed. If necessary, the monitoring biologist shall relocate the individual outside of the work area where it will not be harmed. Work can continue at the location if the applicant and the consulted resource agency determine that the activity will not result in impacts on the species.

- The appropriate agencies shall be notified if a dead or injured protected species is located within the Project Site. Written notification shall be made within 15 days of the date and time of the finding or incident (if known) and must include: location of the carcass, a photograph, cause of death (if known), and other pertinent information.

1.12.3 Cultural Resources

Mitigation Measure CUL-1: The Project Applicant shall prepare an interpretive display and install it in the new community building on the redeveloped Rose Hill Courts property. The interpretive display shall be completed to coincide with the opening of the community building once construction of Phase II is complete. It shall include a brief history of the historic property, its significance in the

contexts of public and defense worker housing in Los Angeles during the Second World War and public housing design related to the Garden City and Modern movements, and a description of the Undertaking which led to the demolition of the historic property. The display shall be professionally written, illustrated, and designed. The content shall be prepared by persons meeting the Secretary of the Interior's (SOI) Professional Qualifications Standards for Architectural History. HCID shall ensure that Project Applicant has satisfactorily completed the interpretive display as described in this stipulation and submit the draft content to SHPO for review and approval. SHPO shall have 30 days to review the interpretive display content before it is produced and installed. (This is PA Stipulation I.A.)

Mitigation Measure CUL-2: HACLA shall add to its existing website a section dedicated to the history of HACLA and public housing in Los Angeles within six (6) months of completing the Rose Hill Courts Redevelopment Project. The website shall provide content on the history of the agency, the significance of public housing in the City, and notable examples of public housing architecture and site planning. It shall include links to other scholarly sources of information on the history and design of public housing. The new website section shall be professionally written, illustrated, and designed. The content shall be prepared by persons meeting the SOI Professional Qualifications Standards for Architectural History. HCID shall ensure that HACLA has satisfactorily completed the new website section as described in this stipulation and submit the draft content to SHPO for review and approval. SHPO shall have thirty (30) days to review the content before it is published. Once the new website section is complete, HACLA shall publicize it in its monthly newsletter. (This is PA Stipulation I.B.)

1.12.4 Geology and Soils

Mitigation Measure GEO-1: Prior to issuance of grading permits, the Applicant shall submit final design plans and a final design-level geotechnical report to the Los Angeles Department of Building and Safety for review and approval. The design-level geotechnical report shall be used for final design of the foundation system for the structures and shall take into consideration the engineering properties beneath the proposed structures and the projected loads. The final report shall specify geotechnical design parameters that are needed by structural engineers to determine the type and sizing of structural building materials. The final report shall be subject to the specific performance criteria imposed by all applicable state and local codes and standards. The final geotechnical report shall be prepared by a registered civil engineer or certified engineering geologist and include appropriate measures to address seismic hazards and ensure structural safety of the proposed structures. The proposed structures shall be designed and constructed in accordance with all applicable provisions of the California Building Code and the Los Angeles Building Code. The design-level geotechnical report shall address each of the recommendations provided in the Geotechnical Investigation Report prepared by Geocon West Inc. (Geocon, 2019; **Appendix J**); dated May 16, 2018 (Revised January 2019), including, but not limited to the following:

- Grading, shoring and foundation plans shall be reviewed by the Geotechnical Engineer prior to finalization to verify that the plans have been prepared in substantial conformance with the recommendations of the Geotechnical Investigation Report (Geocon, 2019) and to provide additional analyses or recommendations.

- Based on the final foundation loading configurations, the potential for settlement shall be reevaluated.

- All excavations shall be observed and approved in writing by the Geotechnical Engineer. Prior to placing any fill, the excavation bottom shall be proof-rolled with heavy equipment in the presence of the Geotechnical Engineer.

- All onsite excavations shall be conducted in such a manner that potential surcharges from existing structures, construction equipment, and vehicle loads are resisted. The surcharge area shall be defined by a 1:1 projection down and away from the bottom of an existing foundation or vehicle load. Penetrations below this 1:1 projection shall require special excavation measures such as sloping or shoring.

- As a minimum, the upper 5 feet of existing earth materials within the proposed building footprint areas shall be excavated and properly compacted for foundation and slab support. Deeper excavations shall be conducted as necessary to remove existing artificial fill or soft alluvial soil at the direction of the Geotechnical Engineer. Proposed building foundations shall be underlain by a minimum of 3 feet of newly placed engineered fill. The excavation shall extend laterally a minimum distance of 3 feet beyond the building footprint areas, including building appurtenances, or a distance equal to the depth of fill below the foundation, whichever is greater.

- Due to the expansive potential of the subgrade soils, the moisture content in the slab and foundation subgrade shall be maintained at 2 percent above optimum moisture content prior to and at the time of concrete placement.

- After finish pad grades have been achieved, laboratory testing of the subgrade soil shall be performed to confirm the corrosivity characteristics of the soils.

- To minimize or avoid the potential for concrete or metal corrosion in onsite soils, a corrosion engineer shall be retained prior to construction to evaluate corrosion test results and incorporate any necessary precautions into project design.

- Concrete mix design shall be reviewed by a qualified corrosion engineer to evaluate the general corrosion potential of the soils on the Project Site.

- Buried metallic structures and elements shall be designed with corrosions protection as determined by a qualified corrosion engineer.

- Project Site soils shall be evaluated for expansion in the final geotechnical report.

- All surface water shall be diverted away from excavations.

- Waterproofing of subterranean walls and slabs shall be required to prevent moisture intrusion and water seepage. Particular care shall be taken in the design and installation of waterproofing to avoid moisture problems, or actual water seepage into the structure through any normal shrinkage cracks which may develop in the concrete walls, floor slab, foundations and/or construction joints.

- A waterproofing consultant shall be retained in order to recommend a product or method, which would provide protection to subterranean walls, floor slabs and foundations.

- Back-drains, if utilized, shall be designed per the recommendations of the final geotechnical report.

- Sub-drainage pipes at the base of the retaining wall drainage system shall outlet to an acceptable location via controlled drainage structures. Drainage shall not be allowed to flow uncontrolled over descending slopes.

- Retaining walls shall include a drainage system extended at least two-thirds the height of the wall. At the base of the drain system, a subdrain covered with a minimum of 12 inches of gravel shall be installed, and a compacted fill blanket or other seal placed at the surface. The clean bottom and subdrain pipe, behind a retaining wall, shall be observed by the Geotechnical Engineer prior to placement of gravel or compacting backfill.

- Wall backfill specifications (e.g., material gradation, compaction requirements, etc.), and surcharge conditions shall be designed per the recommendations of final geotechnical report.

- Walls shall be properly drained to prevent buildup of hydrostatic pressures behind walls or be designed to withstand hydrostatic pressures.

- Seismic lateral forces shall be incorporated into the design as necessary. The structural engineer shall determine the seismic design category for the project in accordance with Section 1613 of the CBC. If the project possesses a seismic design category of D, E, or F, proposed retaining walls in excess of 6 feet in height should be designed with seismic lateral pressure (Section 1803.5.12 of the 2016 CBC).

- The results of the percolation testing shall be evaluated by the project civil engineer to determine if a stormwater infiltration system is required.

- All site drainage shall be collected and controlled in non-erosive drainage devices. Drainage shall not be allowed to flow uncontrolled over any descending slope or pond anywhere on the site, and especially not against any foundation or retaining wall.

- Positive site drainage shall be provided away from structures, pavement, and the tops of slopes to swales or other controlled drainage structures. The building pad and pavement areas shall be fine graded such that water is not allowed to pond. Discharge from downspouts, roof drains, and scuppers shall not occur onto unprotected soils within 5 feet of the building perimeter. Planters located adjacent to foundations shall be sealed to prevent moisture intrusion into the soils providing foundation support.

Mitigation Measure PALEO-1: A qualified paleontologist (approved by the City or County of Los Angeles, as applicable, and the Los Angeles County Natural History Museum Vertebrate Paleontology Department) shall be retained prior to excavation and grading activities at the Project Site.

- Prior to the earth-moving activities, the paleontologist shall develop a site-specific Paleontological Resources Impact Mitigation Program (PRIMP) to be implemented in support of the Project in order to mitigate potential adverse impacts to paleontological resources. The PRIMP shall follow guidelines developed by the Society for Vertebrate Paleontology and shall include, but not be limited to, monitoring of ground disturbance activities in sediments that

are likely to include paleontological resources, specimen recovery, and screen washing; preparation of any collected specimens to the point of identification; curation of any collected specimens to a museum repository with permanent, retrievable storage; and preparation of a final compliance report that would provide details of monitoring, fossil identification, and repository arrangements. The Project Applicant shall then comply with the recommendations of the Project paleontologist and requirements of the PRIMP.

- Before the mitigation program begins, the paleontologist or monitor shall coordinate with the appropriate construction contractor personnel to provide information regarding City or County of Los Angeles requirements, as applicable, for the protection of paleontological resources. Contractor personnel shall be briefed on procedures to be followed in the event that fossil remains and a previously unrecorded fossil site are encountered by earth-moving activities, particularly when the monitor is not on site.

- The qualified paleontologist shall perform periodic inspections of excavation and grading activities at the Project Site to determine the presence of fossiliferous soils. The frequency and location of inspections shall be specified in the PRIMP and shall depend on the depth of excavation and grading activities and the materials being excavated. When Puente Formation sediments (known to contain Miocene marine fossils) are encountered (generally at depths of 11 to 16 feet or more at the Project site) the paleontologist shall monitor full time during excavation. If paleontological materials are encountered, the paleontologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. A copy of the paleontological survey report shall be submitted to the Los Angeles County Natural History Museum. Any fossils recovered during mitigation shall be deposited in an accredited and permanent scientific institution for the benefit of current and future generations.

1.12.5 Hazards and Hazardous Materials

Mitigation Measure HAZ-1: Due to the presence of lead in the soil at the Project Site, a Soil Management Plan (SMP) shall be prepared. Prior to the commencement of grading and excavation, the Project Applicant shall retain a qualified environmental consultant to prepare a SMP that complies with all applicable regulatory requirements. The SMP shall be submitted to the City of Los Angeles Department of Building and Safety for review and approval prior to the commencement of excavation and grading activities. The SMP shall contain the following:

- The recommendations of the HHMD and LAFD.

- The SMP shall require that the Project Applicant to remove and properly dispose of impacted materials in accordance with applicable requirements of the DTSC, and County of Los Angeles Fire Department.

- The SMP shall require that contaminated soils be transported from the Project Site by a licensed transporter and disposed of at a licensed storage/ treatment facility to prevent contaminated soils from becoming airborne or otherwise released into the environment.

- The SMP shall be implemented during excavation and grading activities.

- A qualified environmental consultant shall be present on the Project Site during grading and excavation activities in the known or suspected locations of contaminated soils, and shall be on call at other times as necessary, to monitor compliance with the SMP and to actively monitor the soils and excavations for evidence of contamination.

Mitigation Measure HAZ-2: Prior to issuance of the Building Permit(s), the Project Applicant shall consult with the City of Los Angeles Department of Building and Safety regarding radon at the Project Site. After construction of each Phase, radon testing shall be conducted on the Project Site to confirm if radon concentrations in the new buildings on the Project Site exceed the USEPA action level of 4.0 pCi/L. The results of the radon tests shall be provided to the City of Los Angeles Department of Building and Safety. The Project Applicant shall implement any recommendations from the City of Los Angeles Department of Building and Safety regarding radon.

1.12.6 Noise

Mitigation Measure N-1: The construction contractor will conduct noise monitoring near sensitive receivers identified for this Project, during the suspected noise producing construction activities. During times that active construction equipment is within 200 feet of a residence or other sensitive receiver, noise measurements will be taken for at least three 15-minute periods per hour for two hours. If the monitored noise levels exceed background (ambient) noise levels by 5 dB or feet of a residence or other sensitive receiver for two or more 15-minute periods per hour, then the construction contractor will mitigate noise levels using temporary noise shields, noise barriers or other mitigation measures to comply with those restrictions or standards. (See mitigation measures **N-2** and **N-3** below.)

Mitigation Measure N-2: The construction contractor will use the following source controls, in response to complaints and/or when ambient noise monitoring of complainant's exposure shows that noise from construction exceeds ambient levels by at least 5 dBA, except where not physically feasible:

- Use of noise producing equipment will be limited to the interval from 8:00 a.m. to 5:00 p.m., Monday through Friday.
- For all noise producing equipment, use types and models that have the lowest horsepower and the lowest noise generating potential practical for their intended use.
- The construction contractor will ensure that all construction equipment, fixed or mobile, is properly operating (tuned up) and lubricated, and that mufflers are working adequately.
- Have only necessary equipment on site.
- Use manually adjustable or ambient sensitive backup alarms.[3]

Mitigation Measure N-3: The contractor will use the following path controls, in response to complaints and when ambient noise monitoring of complainant's exposure shows exceedance of local standards, except where not physically feasible:

3 These are backup alarms that focus their noise on a specific area and/or automatically adjust the volume of the noise to be only slightly above that of the ambient level at the worksite.

- Install portable noise barriers, including solid structures and noise blankets, between the active noise sources and the nearest noise receivers.

- Temporarily enclose localized and stationary noise sources.

- Store and maintain equipment, building materials and waste materials as far as practical from as many sensitive receivers as practical.

Mitigation Measure N-4: Advance notice of the start of construction shall be delivered to all noise-sensitive receivers adjacent to the Project area. The notice shall state specifically where and when construction activities will occur, and provide contact information for filing noise complaints with the contractor and the City.

Mitigation Measure N-5: Before issuance of a building permit, the building contractor shall prepare, and the City shall review and approve, a Construction Noise Control Plan. The plan shall include and describe in detail how mitigation measures **N-1** through **N-4** will be implemented.

1.12.7 Public Services

Mitigation Measure PS-1: Temporary construction fencing shall be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area.

Mitigation Measure PS-2: Project plans shall incorporate the "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", published by the LAPD relative to security, semi-public and private spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas. These measures shall be approved by the City of Los Angeles Police Department prior to the issuance of building permits.

Mitigation Measure PS-3: During Project construction the construction contractor shall ensure that access to Rose Hill Recreation Center, Rose Hill Park, and Ernest Debs Regional park is maintained for the public. If access to these facilities is temporarily blocked off during construction, the construction contractor shall ensure that an alternate route is available for public access and the contractor shall provide signs clearly marking the alternate route to the park/recreation facilities.

1.12.8 Transportation

Mitigation Measure TRANS-1: Prior to the commencement of Project construction, the Construction Manager for the Project will submit a detailed Construction Management Plan to be reviewed and approved by LADOT. In the Construction Management Plan, the Construction Manager will schedule truck traffic and employee shifts to avoid creating trips during the peak traffic periods, as is feasible for construction operations. All measures including identified truck routes and designated employee parking areas should be included in the Construction Management Plan.

Mitigation Measure TRANS-2: Prior to issuance of a demolition permit, the Project applicant shall submit a construction parking management plan to the City of Los Angeles that details how parking will be managed during Phase I and Phase II of Project construction. The parking management plan shall specify where onsite and offsite parking will be available during both phases of Project

construction. This plan shall be made available to the City in both hard copy and electronic format so that it can be disseminated to persons who request this information during construction of the project.

Mitigation Measure TRANS-3: Prior to issuance of a demolition permit, the Project applicant shall submit to the City of Los Angeles Planning Department and the Planning Department shall approve a construction management schedule. The schedule shall include a street closure plan to ensure the continued flow of vehicle traffic (including bus traffic, and potential temporary bus stop closure or relocation along Mercury Avenue), pedestrian traffic, and bicycle traffic during temporary street closures during both Phase I and Phase II of Project construction.

1.13 Summary of Alternatives

This Draft EIR examines in detail three alternatives to the project, which include: Alternative 1: No Project/No Action Alternative, Alternative 2: Non-Historically Compliant Rehabilitation Alternative, and Alternative 3: Historic Rehabilitation Alternative. A general description of these alternatives is provided below. Refer to **Section 5.0** of this Draft EIR for a more detailed description of these three alternatives, a comparative analysis of the impacts of these alternatives to those of the proposed Project, and a description of the alternatives that were considered but rejected as infeasible.

1.13.1 Alternative 1 – No Project/No Action Alternative

Alternative 1, the No Project Alternative, assumes that the project would not be approved, no new permanent development would occur within the Project Site, and the existing environment would be maintained. This alternative would involve the continuation of uses on the site; therefore, existing buildings and tenants would remain at the Project Site. No demolition of the existing 15 buildings would occur and no new buildings would be constructed. With this alternative, the existing 100 affordable housing units and existing parking would remain the same on the Project Site. While HACLA would continue to perform routine maintenance, the existing buildings will continue to require significant capital investment due to their age, however; major upgrades to utilities, amenities, and energy efficiency would not occur. The long-term needs of the site would not be addressed and additional affordable housing units would not be constructed on site. No temporary relocation of the existing residents would be required for this alternative. Under this Alternative, the site would continue to be used for public housing and the HUD public housing occupancy standards would not change. The site would not be used for the HUD Section 8 subsidy program and current residents would not have the opportunity to move to a different sized unit since none would be available.

While the No Project Alternative would avoid all of the Project's significant impacts it would not achieve any of the basic Project objectives.

1.13.2 Alternative 2 - Non-Historically Compliant Rehabilitation Alternative

This alternative would redevelop the existing buildings at Rose Hill Courts to modernize and upgrade the units and the site and make aesthetic and energy efficiency improvements. Alternative 2 would consist of maintaining the existing 100 units, and providing renovations to restore and modernize the buildings including: (1) comprehensive rehabilitation of the interior and exterior of the units; (2) lead and asbestos remediation; (3) structural and seismic repairs; and (4) replacement of major building systems. Proposed improvements would include the following:

- Interior improvements including removal of all interior finishes and new drywall, paint, flooring and interior light fixtures, at all living areas, kitchens and bathrooms; addition of bathrooms, and installation of new electrical, plumbing, mechanical systems and appliances.

- Health and Safety Improvements including removal of dry rot, termite damage and mold; lead and asbestos remediation; structural/seismic repairs.

- Exterior Improvements including new roofing; new windows; stucco replacements; new landscaping. Outdoor areas would be modified to eliminate the outdoor laundry hanging areas and replace with outdoor seating, walkways, courtyards, play areas and other modern amenities.

- Community Building Renovation including expansion of the existing building in order to accommodate a community room, kitchen, computer room and other uses.

This alternative would renovate the exterior of the buildings in a manner that would not meet the requirements in *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings* (Grimmer et. al, 2017) (Secretary of the Interior's Standards), as discussed in CEQA § 15064.5(b)(3) and **Section 4.4**, Cultural Resources. Under Alternative 2, all the buildings would be brought up to City code requirements regarding fire, health, and safety. Alternative 2 would include replacing windows with modern vinyl windows (that would be sliders and would not have the appearance of the existing steel true divided light casements), redesigning building entries with porches and canopies, adding architectural features (trellises, canopies, projections, roof line alterations, additional siding materials) inconsistent with 1940s era garden apartments. The Non-Historically Compliant Rehabilitation Alternative would retain the existing 100 units on the Project Site and would not allow for the opportunity to increase the number of affordable housing units on the Project Site. There would be a minimal increase in the number of occupied housing units from the existing 91 habitable units to 100 habitable units because this alternative would make all 100 units on the Project Site habitable. Residents would be temporarily relocated during the renovation of units.

Under this Alternative, the low-income use of the site would change from the current HUD public housing program to a HUD Section 8 subsidy program. Redevelopment would involve the temporary relocation of residents during the rehabilitation of units. When residents return to a renovated unit with Section 8 subsidy, they would need to be "right sized" to the new occupancy standards and thus not all residents would be able to return to the same sized unit they currently reside in. Since only nine additional units would be added (for a total of 100) due to renovations, not all current residents may be able to return to Rose Hill Courts due to the change in occupancy standards.

Alternative 2 would reduce some of the impacts to aesthetics, cultural resources, hazards and hazardous materials, land use and planning, as well as recreation and parks. Alternative 2 would have similar impacts to biological resources, and would have some similar transportation impacts. This alternative would have less impacts to air quality, geology and soils, greenhouse gases, noise, fire protection, police protection, schools, libraries, tribal cultural resources, wildfire, and energy, with some lesser transportation impacts. Under this alternative, impacts to population and housing would be similar during the construction phase and greater but still less than significant than the Project. In addition, Alternative 2 would not achieve most of the basic project objectives.

1.13.3 Alternative 3 - Historic Rehabilitation Alternative

This alternative would redevelop the existing units at Rose Hill Courts in a way that would preserve the historic integrity of the buildings by meeting the Secretary of the Interior's Standards. This alternative would restore the characteristics of the Garden Style design utilized in the Rose Hill Courts development, including, but not limited to, low-slung buildings, large open spaces, and recreational amenities. Also in accordance with the Citywide Design Guidelines (Los Angeles Department of City Planning, 2011, p. 23) special design considerations would include preserving original building materials and architectural features; preserving, repairing, and replacing, as appropriate, building elements and features that are important in defining historic character; and retaining the original building continuity, rhythm, and form created by these features.

Alternative 3 would also consist of updating the existing 100 units with: (1) lead and asbestos remediation; (2) structural and seismic repairs; and (3) replacement of major building systems. Proposed improvements would include:

- Interior improvements including removal of all interior finishes and new drywall, paint, flooring and interior light fixtures, at all living areas, kitchens and bathrooms; addition of bathrooms, and installation of new electrical, plumbing, mechanical systems and appliances.

- Health and Safety Improvements including removal of dry rot, termite damage and mold; lead and asbestos remediation; structural/seismic repairs.

This alternative would rehabilitate the exterior of the buildings in a manner that would meet the requirements in the Secretary of the Interior's Standards and consistent with the 1940s era garden apartments. The Historic Rehabilitation Alternative would retain the existing 100 units on the Project Site and would not allow for the opportunity to increase the number of affordable housing units on the Project Site. There would be a minimal increase in the number of occupied housing units from the existing 91 habitable units to 100 habitable units because this alternative would make all 100 units on the Project Site habitable. Residents would be temporarily relocated during historic rehabilitation of the units.

Under this Alternative, the low-income use of the site would change from the current HUD public housing program to a HUD Section 8 subsidy program. Redevelopment would involve the temporary relocation of residents during the rehabilitation of units. When residents return to a renovated unit with Section 8 subsidy, they would need to be "right sized" to the new occupancy standards and thus not all residents would be able to return to the same sized unit they currently reside in. Since only nine additional units would be added (for a total of 100) due to rehabilitation, not all current residents may be able to return to Rose Hill Courts due to the change in occupancy size standards.

The Historic Rehabilitation Alternative would reduce the significant aesthetic and cultural resources to a less than significant level by maintaining the historic integrity of the property through conformance with the Secretary's Standards. Alternative 3 would not completely eliminate the Project's impacts that would be significant and unavoidable, given the reduction in construction activities, equipment, and duration. Alternative 3 would also reduce the Project's short-term significant and unavoidable impacts of noise to a less-than-significant level during construction. Alternative 3 would also reduce many of the Project's less-than-significant impacts compared to the other alternatives, However, Alternative 2 would not achieve most of the basic project objectives.

1.13.4 Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a project shall identify an Environmentally Superior Alternative among the alternatives evaluated in an EIR. The CEQA Guidelines also state that should it be determined that the No Project/No Build Alternative is the Environmentally Superior Alternative, the EIR shall identify another Environmentally Superior Alternative among the remaining alternatives.

With respect to identifying an Environmentally Superior Alternative among those analyzed in this Draft EIR, the range of feasible alternatives includes the No Project/No Action Alternative; the Non-Historically Compliant Rehabilitation Alternative; and the Historic Rehabilitation Alternative. **Table 5.4-1** on page 5-6 provides a summary of the description of alternatives and a comparison of the different project components. **Table 5.4-2** on page 5-7 provides a summary comparison, by environmental topic, of the Project impacts and the impacts of each of the alternatives. **Table 5.4-3** on page 5-11 provides a summary comparison of each of the alternatives' ability to meet the goals and objectives of the Project. A more detailed description of the potential impacts associated with each alternative is provided above. Pursuant to § 15126.6(c) of the CEQA Guidelines, the analysis below addresses the ability of the alternatives to "avoid or substantially lessen one or more of the significant effects" of the Project.

Of the alternatives analyzed in this Draft EIR, Alternative 1, the No Project/No Action Alternative would avoid all of the Project's significant environmental impacts, including the Project's significant and unavoidable impacts related to aesthetics (historical resources) and historical resources due to demolition of existing historical buildings onsite; and short-term significant and unavoidable noise impacts during construction. Although Alternative 1 would reduce most of the Project's less-than-significant and less-than-significant-with-mitigation impacts, it would not address and mitigate the existing hazardous materials onsite such as ACMs, LBPs, lead in the drinking water due to lead in the pipes, the deteriorating termite-infested wood in the existing buildings, or the existing nine uninhabitable units. Furthermore, the No Project/No Action Alternative would not meet any of the Project's basic objectives.

In accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than the No Project/No Build Alternative, a comparative evaluation of the remaining alternatives indicates that Alternative 3, the Historic Rehabilitation Alternative, would be the Environmentally Superior Alternative. As discussed above, while Alternative 3 would not completely eliminate the Project's impacts that would be significant and unavoidable, given the reduction in construction activities, equipment, and duration, Alternative 3 would eliminate the Project's significant and unavoidable impacts to aesthetics (with respect to historical resources) and cultural resources since the rehabilitation of the buildings would retain the historic integrity through conformance with the Secretary's Standards. . Alternative 3 would also reduce the Project's short-term significant and unavoidable impacts of noise to a less-than-significant level during construction. Alternative 3 would also reduce many of the Project's less-than-significant impacts compared to the other alternatives. Thus, of the range of alternatives analyzed, Alternative 3 would be the Environmentally Superior Alternative.

However, as discussed in Section 5.7.4 above, under Alternative 3, none of the Project objectives would be fully met, only three of the eight objectives would be partially met, and five of the eight Project's objectives would not be met at all. Alternative 3 would not be able to provide the region-wide economic, legal, social, technological, or other benefits to the low-income population that the objectives of the Project would provide. Therefore, even though Alternative 3 is the

Environmentally Superior Alternative, it would not provide the greatest benefits to the low-income population that HACLA is mandated to serve.

SECTION 2.0 – PROJECT DESCRIPTION

2.0 PROJECT DESCRIPTION

2.1 Introduction

The Project proposes to redevelop the existing 5.24-acre (228,255 square feet) Rose Hill Courts (RHC) public housing site (Project Site) located within the Northeast Los Angeles Community Plan (Community Plan), in the El Sereno Community of the City of Los Angeles (City). Rose Hill Courts is a low-income public housing project constructed in 1942 by the Housing Authority of the City of Los Angeles (HACLA). Rose Hill Courts was formally determined eligible for the National Historic Register of Historic Places and is therefore listed in the California Register of Historical Resources. The Project proposes to build 185 new multi-family units, 174 parking spaces and a Management Office/Community Building. The existing 15 structures onsite, which currently have significant capital needs due to their age, would be demolished.

The Project would be completed in two phases. Phase I, located on the northeast corner of the site at McKenzie and Florizel, would include 89 units (replacing seven buildings consisting of 20 units and the existing administration building). Phase II, on the balance of the site, would include 96 new units (replacing eight buildings consisting of 80 units). The Project proposes nine buildings that would include a total of 88 one-bedroom units, 59 two-bedroom units, 30 three-bedroom units, and eight four-bedroom units. The Project would also include a 6,366-square-foot Management Office/Community Building and a "Central park" green space, creating a park-like setting for residents. The Project would provide a total of 174 parking spaces onsite, with at-grade and tuck-under parking; upgraded lighting, fencing, signage, and security features; and storm-drain and utility improvements. The new sustainably designed buildings would be energy efficient and the landscaping would include water-efficient irrigation.

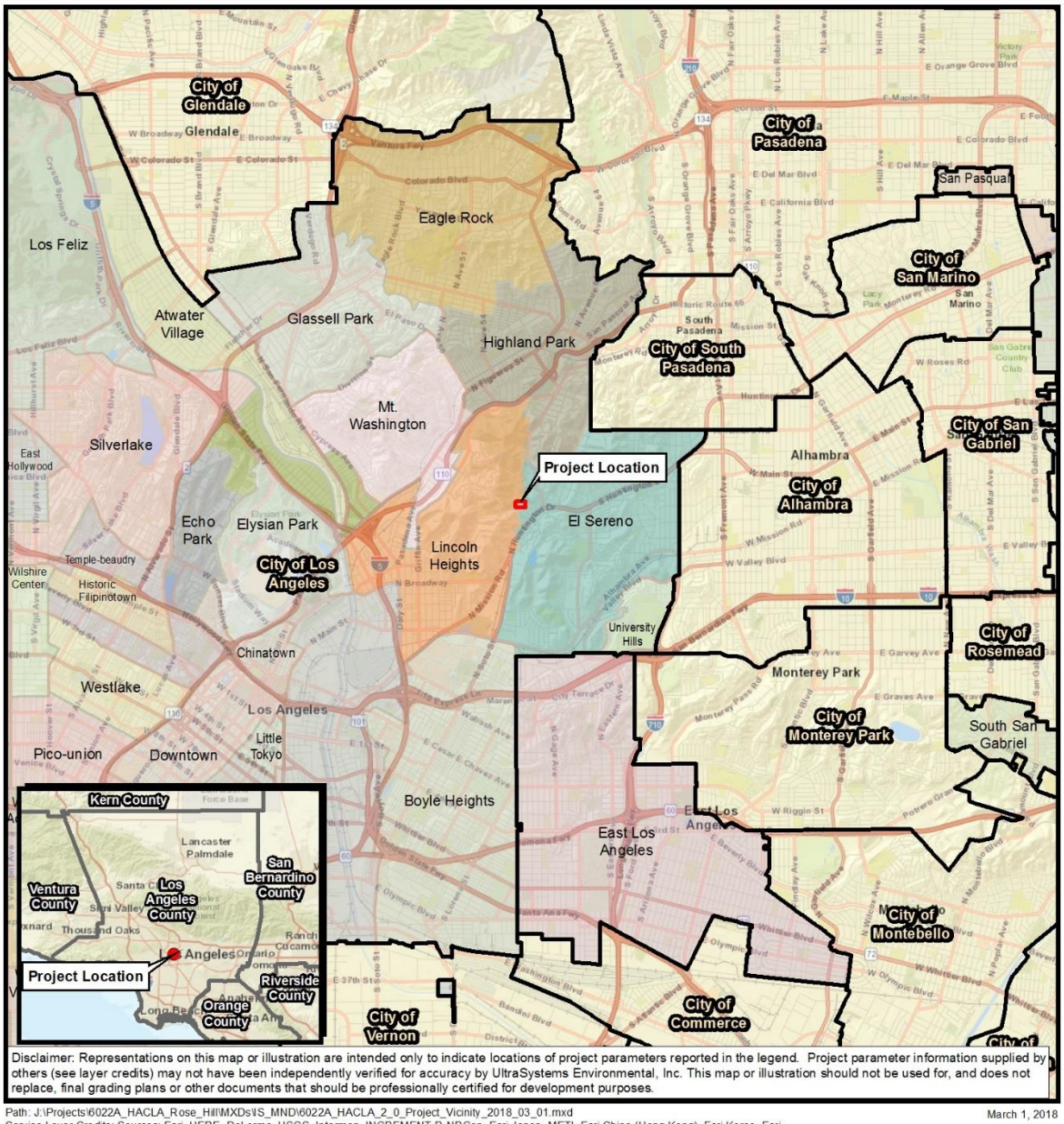
The Project Site is zoned by the City of Los Angeles Municipal Code (LAMC) as [Q]R1-1D (Qualified One-Family Dwelling, Height District 1D) and has a Community Plan designation of Low Residential. The Qualified zone classification "Q" reflects the Northeast Los Angeles Hillside Ordinance.

2.2 Project Location and Setting

2.2.1 Project Location

The Project Site is located at 4446 Florizel Street. The Project Site is located within the Northeast Community Plan area, in the El Sereno Community of the City of Los Angeles (refer to **Figure 2.2-1**). The Project Site is generally bounded by Florizel Street to the north, McKenzie Avenue to the east, Mercury Avenue to the south, and Boundary Avenue to the west. In addition, a driveway bisects the site from west to east. Mercury Avenue, a City collector street, provides direct access to the Project Site from Monterey Road and Huntington Drive. Refer to **Figure 2.2-2**. The Project Site is located approximately five miles northeast of downtown Los Angeles. Primary regional access is provided by State Route 110 (SR-110) (San Bernardino Freeway) via Interstate 5 Freeway (I-5) located approximately one mile west of the Project Site. Major arterials providing regional access to the Project Site vicinity include Huntington Drive, Valley Boulevard/Alhambra Avenue, and N. Eastern Avenue.

Figure 2.2-1
PROJECT LOCATION MAP



Disclaimer: Representations on this map or illustration are intended only to indicate locations of project parameters reported in the legend. Project parameter information supplied by others (see layer credits) may not have been independently verified for accuracy by UltraSystems Environmental, Inc. This map or illustration should not be used for, and does not replace, final grading plans or other documents that should be professionally certified for development purposes.

Path: J:\Projects\6022A_HACLA_Rose_Hill\MXDs\IS_MND\6022A_HACLA_2_0_Project_Vicinity_2018_03_01.mxd
Service Layer Credits: Sources: Esri, HERE, DeLorme, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), MapmyIndia, NGCC, © OpenStreetMap contributors, and the GIS User Community; LA County Assessor, 2017-2018; LA County, 2013/2015; UltraSystems Environmental, Inc., 2018

March 1, 2018

Scale 1:95,040

N

0 0.75 1.5 Miles

0 0.75 1.5 Kilometers

Legend

Project Boundary

City Boundary

Rose Hill Courts Redevelopment

Project Vicinity

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Figure 2.2-2
AERIAL PHOTOGRAPH OF PROJECT VICINITY

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Path: J:\Projects\6022A_HACLA_Rose_Hill\MXDs\S_MND\6022A_HACLA_2_0_Project_Location_2018_03_01.mxd
Service Layer Credits: Sources: Esri, HERE, DeLorme, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), MapmyIndia, NGCC, © OpenStreetMap contributors, and the GIS User Community, Esri, HERE, DeLorme, MapmyIndia, © OpenStreetMap contributors, Esri, HERE, DeLorme, MapmyIndia, © OpenStreetMap contributors, and the GIS user community, Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community; LA County Assessor, 2017-2018; UltraSystems Environmental, Inc., 2018

March 1, 2018

Scale 1:7,200

N

Legend

Project Boundary

Rose Hill Courts Redevelopment

Project Location

0 300 600 Feet

0 100 200 Meters

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There are three bus stops adjacent to the Project Site operated by the Los Angeles County Metropolitan Transit Authority (Metro).

2.2.2 Surrounding Uses

Rose Hill Courts is located within the community of El Sereno, an urbanized area in Northeast Los Angeles with 9,826 people per square mile (Mapping LA). This area is characterized by its residential communities located in and around numerous steep hills and vistas, which are located west of Monterey Road. Land uses surrounding the Project Site include the Ernest E. Debs Regional Park (the fourth largest park in the City) to the west, along Mercury Avenue and Boundary Avenue; Rose Hill Park to the north; and the Rose Hill Recreation Center to the southeast. Our Lady of Guadalupe Catholic Church and Elementary School is located to the east of the Project Site along Browne Avenue. Single-family and multi-family residential developments are located to the south and east of the Project Site. The nearest commercial artery is Huntington Blvd, approximately 0.3 mile east of the Project Site.

2.3 Existing Conditions

The Project Site is currently developed with 100 units of low -income public housing. **Section 3.0**, Environmental Setting, of this Draft EIR includes more details regarding the existing conditions of the site.

There are 15 buildings onsite currently, including 14 multi-family residential buildings, containing townhomes and flats, and one administration building with offices, a common room, a kitchen, pantry, and two bathrooms. Buildings throughout the Project Site are rectangular in shape and are generally arranged in parallel groupings. Generally, there are five different building types located onsite, all of which are either one or two stories in height, and consist of wood-frame construction, concrete slab foundations, and composition roofing. Parking for the complex consists of paved surface parking areas located along both sides of a private driveway that bisects the northern and southern blocks of the Project Site. Trees within the Project Site consist of various non-native species, including Eucalyptus, Jacaranda, Chinese elm and Avocado trees that are not subject to the City's Protected Tree Regulations.[4]

2.4 Land Use and Zoning

a. <u>Northeast Los Angeles Community Plan</u>

The Project Site is located in the Northeast Los Angeles Community Plan (Community Plan) area and has a designated land use of low density residential (which corresponds to RE9, RS, R1, RU, RD6, RD5 zones).

b. <u>City of Los Angeles Municipal Code</u>

The Project Site is zoned by the Los Angeles Municipal Code as [Q]R1-1D (One Family Dwelling, Height District 1D). The One Family Zone permits one- and two-family dwellings, parks, playgrounds and community centers. Therefore, the Rose Hill Courts development is an existing non-conforming

4 The City of Los Angeles Protected Tree Regulations apply to Oak, Southern California Black Walnut, Western Sycamore, and California Bay tree species that are native to Southern California, and excludes trees grown by a nursery or trees planted or grown as part of a tree planting program.

use because the existing development has multi-family housing units which were constructed before the site was downzoned to R1 in 2000. The project is requesting deviations under the LAMC Section 14.00B including a density bonus in excess of that permitted in section 12.22 A.25 as well as the following items:

a. The project consists of a combination of two, three and four-story structures reaching a maximum height of 56-feet in lieu of the 30-feet otherwise required by Ordinance 180,403, and the associated "D" Limitation A1.a.

b. The project will adhere to a front yard setback of 14-20 feet in lieu of the standard 20-foot setback otherwise required by the R1 zone.

The Project is also requesting an Affordable Housing Density Bonus as identified in Los Angeles Municipal Code Section 12.22 A.25 and filed per LAMC 11.5.7 – Request is to allow a Density Bonus project with the following off- menu incentives:

a. To Allow an affordable housing project to calculate its buildable area based on the "Buildable Area" definition in LAMC 12.03 rather than the "Floor Area, Residential" and "Base Floor" definitions referenced in Ordinance 180,403, and "Q" Condition 2.d. (1), and LAMC 12.03.
b. To Allow an affordable housing project to deviate from the "step-back" provisions of Ordinance 180,403, and "Q" Condition 2.d. (2). This deviation shall additionally require no limitation on the percentage of exterior walls facing a front lot line.
c. To Allow an affordable housing project to consist of one (1) building type and roof form in lieu of the three (3) or more identified in Ordinance 180,403, and "Q" Condition 2.d. (3).
d. To Allow new hardscape areas to utilize both permeable and impermeable paving systems in lieu of the language requiring projects to utilize only permeable paving systems identified in Ordinance 180,403, and "Q" Condition 2.f. and "Q" Condition 5.e.
e. To Allow the construction of retaining walls that exceed the total quantity and linear footage identified in Ordinance 180,403, and "Q" Condition 3.a.
f. To Allow an affordable housing project to grade a site in keeping with an approved geotechnical investigation report approved by the LADBS Grading Division in lieu of the Planning Guidelines Landform Grading Manual adopted by City Council and identified in Ordinance 180,403, and "Q" Condition 5.b.
g. To Allow grading activities to comply with an approved geotechnical investigation report approved by the LADBS Grading Division in lieu of the amounts identified in Ordinance 180,403, and "Q" Condition 5.d.

As provided below in Subsection 2.8, Necessary Approvals, the Project includes a Density Bonus/Public Benefit application to permit the proposed height and density. Providing a Public Benefit Project with Alternative Compliance as well as a Density Bonus would allow for the proposed Project to be constructed without a General Plan Amendment or zone change from the City of Los Angeles.

2.5 Project Objectives

Section 15124(b) of the California Environmental Quality Act (CEQA) Guidelines states that the project description shall contain "a statement of the objectives sought by the proposed project." Section 15124(b) of the CEQA Guidelines further states that "the statement of objectives should

include the underlying purpose of the project." The underlying purpose of the Project is to provide more affordable housing to meet the City's affordable housing needs and to allow the current residents the right to return after the redevelopment. The Project's specific objectives are as follows:

1. To provide a substantial increase in the number of affordable housing units than exist today at the project site, consistent with the goals of HACLA's 25-Year Vision Plan, *Build* HOPE, to expand affordable housing opportunities and increase the permanent affordable housing supply in Los Angeles.

2. To maximize the opportunity for existing tenants to return once the project is completed by matching their household size to a "right size" unit.

3. To assist the City of Los Angeles in meeting its affordable housing needs and goals.

4. To design the project in a manner that maximizes accessibility, energy efficiency and contemporary amenities.

5. To provide a site that enhances security and provides for safe and useable open/green space.

6. To increase and locate on-site parking in closer proximity to the housing units.

7. To provide a long-term useful life of buildings to minimize the future need for investment in affordable housing rehabilitation and repairs.

8. To maximize housing in close proximity to transit and parks.

2.6 Project Characteristics

2.6.1 Project Overview

Rose Hill Courts is public housing currently owned by HACLA. In order to finance and develop the Project, HACLA and Related will form a limited partnership, that will obtain the necessary debt and equity financing to construct the new units, through a Disposition and Development Agreement and long-term ground lease with HACLA. The partnership will own the improvements for the term of the ground lease and HACLA will remain the owner of the underlying land. HACLA will ensure that restrictions will be in place throughout the term of the ground lease, to ensure long term affordability of the units. Thus, the improvements will be privately owned and managed affordable housing and the land will remain under public ownership.

The Project would be developed in two phases. The Project would demolish the existing 15 structures and construct a total of 185 residential housing units (183 affordable housing units onsite plus two market-rate managers' units). Seven buildings (20 units, estimated total 17,017 square feet) and the existing administrative building (estimated 2,810 square feet) would be demolished in Phase I. Eight buildings (80 units, estimated total 62,818 square feet) would be demolished in Phase II.

The Project proposes 88 one-bedroom units, 59 two-bedroom units, 30 three-bedroom units, and eight four-bedroom units. There would be a total of nine new residential buildings (Buildings A through I) totaling 156,926 square feet. The Project would include a 6,366-square-foot Management Office/Community Building and a "Central Park" green space, creating a park-like setting for residents. The Project would provide a total of 174 parking spaces onsite, with at-grade and

tuck-under parking; upgraded lighting, fencing, signage, and security features; and storm drain and utility improvements. The new sustainably designed buildings would be energy efficient and the landscaping would include water-efficient irrigation.

Phase I includes two residential buildings (Buildings A and B totaling 70,610 square feet). Phase II includes seven additional buildings (Buildings C through I) totaling 86,316 square feet. and Building J, which is a 6,366-square-foot Management Office/Community Building. Overall, the Project would remove approximately 79,835 square feet of existing residential floor area and construct up to 156,926 square feet of new residential floor area, resulting in a net increase of up to 77,091 square feet of net new residential floor area within the Project Site. The Project would also create a total of 44,012 square feet of usable open outdoor space, 8,007 square feet of open indoor space, 9,350 square feet of private open space, and 61,369 square feet of total open space. The total landscaped area on the project site would be 63,3653 square feet. When completed, an additional 83 affordable units would be provided as compared to the existing Rose Hill Courts complex.

2.6.2 Project Design

Based on extensive outreach to the residents on the site and the community at large, the Project has been designed to provide high quality, multi-family housing, at a scale that is contextual and appropriate for the site and the community.

The architectural plan is based on creating a development with multiple building and unit types with shared amenities. The first phase of the Project is located in the northeast corner of the site, and is located so as to minimize the number of residents that will need to be temporarily relocated during the construction of Phase I. Of the 20 units in the footprint of Phase I, only 15 are currently occupied. Phase I includes two four-story elevator buildings (Buildings A and B) with flats, in order to provide the maximum level of accessibility for the existing tenant population (many of whom are elderly/disabled) who will move into Phase I once it is completed. Building A would be 56 feet in height and Building B would be 47 feet in height. Building A in Phase I will include community spaces for residents of both Buildings A and B and an onsite leasing office that will ultimately be relocated to the Management Office/Community Building, once Phase II is complete.

The proposed buildings would be designed in a contemporary style. Projecting balcony decks, horizontal overhangs and canopies would be integrated with other architectural elements, such as balcony railings and shading devices. These architectural elements would provide horizontal and vertical articulations that would serve to break up the building planes and modulate building massing. The buildings are designed with a variety of exterior finishes, including stucco, composite siding, storefront windows, simulated wood accents, metal railings, integrated signage and lighting.

Phase II will be developed on the remainder of the Project Site and steps down in massing and height to provide a residential scale appropriate for the adjacent land uses. Buildings C and D (facing Boundary Ave.) are three stories, 46 feet in height, and would each contain 24 units; Buildings E and F, which are located towards the interior of the site, are three stories, 40 feet in height, with tuck-under parking, and Buildings G, H and I (facing Mercury Ave.) are two stories in height. Buildings G and H would be 30 feet in height and Building I would be 36 feet in height. The design promotes an "eyes on the street" approach, with individual unit entries for Buildings G-I along Mercury Avenue and ground-level patios encouraging resident interaction with passersby. Phase II also includes the Management Office/Community Building (Building J), which would be one story and 25 feet in height.

Phase II transitions from the contemporary style of Phase I to a more traditional style along Mercury Avenue. Building C and D represent a stylistic transition from Building A and B, utilizing some of the same materials. Buildings E-I are more traditional in design with a "cottage" residential look, and their exterior expression includes balconies, pitched rooflines, horizontal and vertical "wood look" composite siding. These buildings would include trellises, asphalt shingled roofs, recessed dual-glazed vinyl windows, horizontal siding, and exterior stucco.

Refer to **Appendix F1** which contains the entire plan set for the Project, including material boards for both phases of the Project.

The components of the Project are listed below in **Table 2.6-1** and conceptually depicted in **Figure 2.6-1, following the table below.**

Table 2.6-1
PROJECT SUMMARY

Address	4446 Florizel Street Los Angeles, CA 90032
Assessor's Parcel Number	5305-011-900
Approximate Acreage	5.24
Phase I Units	89
Phase II Units	96
Total Number of Units	185
Estimated Total Population of Proposed	656 persons (a net increase of 435 persons from existing conditions)
Approximate Lot Coverage	Phase I: 32 % Phase II: 34%
Approximate Floor Area Ratio	Phase I: 1.29 Phase II: 0.68
Total Number of 1-bedroom units	88
Total Number of 2-bedroom units	59
Total Number of 3-bedroom units	30
Total Number of 4-bedroom units	8
Management Office/Community Building	6,366 square feet
Open Space/Amenity Summary:	
-Open Outdoor Space (usable)	Phase I: 10,708 square feet Phase II: 33,304 square feet
-Open Indoor Space	Phase I: 1,641 square feet Phase II: 6,366 square feet
-Private Open Space	Phase I: 4,550 square feet Phase II: 4,800 square feet
-Total Open Space	Phase I: 16,899 square feet Phase II: 44,470 square feet
-Total Landscape Area	Phase I: 13,826 square feet Phase II: 49,827 square feet

Building Height	Buildings A & B would be 4-story buildings and would be no more than 56 feet above the proposed grade. Buildings C & D would be 3-story buildings as viewed from street and would be no more than 46 feet above the proposed grade when viewed from lowest point. Buildings E & F would be 3-story buildings and would be no more than 40 feet above the proposed grade. Buildings G, H would be 2-story buildings and would be no more than 30 feet above the proposed grade. Building I would be a 2-story building and would be no more than 36 feet above the proposed grade.f Building J would be a 1-story building and would be no more than 25 feet above the proposed grade.
Density	185 units on a 5.24-acre site equates to approximately 35.31 dwelling units /acre
Parking Spaces	Total Spaces: 174 Phase I will have 55 spaces, of which four will be handicapped accessible and Phase II will have 119 spaces, of which six will be handicapped accessible.

Source: Withee Malcolm Architects, 2019. Rose Hill Courts Plans dated April 8, 2019.

Figure 2.6-1
ROSE HILL COURTS CONCEPTUAL SITE PLAN

Disclaimer: Illustration provided by Withee Malcolm Architects.

Source: Withee Malcolm Architects, April 08, 2019

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Master Site Plan

2.6.3 Access, Circulation, and Parking

As previously described, the proposed buildings would be organized around an outdoor green space that would run east-west through the center of the Project Site. The green space would extend to the proposed Management Office/Community Building along the eastern portion of the Project Site, which serves as the central gathering space for the residents. Pathways onsite connect each group of buildings to the central green space and to the Management Office/Community Building.

As in **Figure 2.6.1**, vehicular access to the Project Site would be provided via six driveways, including one entry driveway located along McKenzie Avenue (serving the Management Office/Community Building and Building I). Three entry/exit driveways along Florizel Avenue serve the parking lots of Buildings A, B and C. Two entry/exit driveways along Mercury Avenue serve Buildings D, E and G and Buildings F and H, respectively. Trash collection trucks would access the Project Site using these driveways and the trash collection areas would be enclosed and not visible to the surrounding uses.

As shown in **Figure 2.6-1,** new pedestrian access points would be created throughout the Project Site via pedestrian walkways connecting to the interior central green space between the individual buildings. The main public entry to the site is via the new Management Office/Community Building, which will include onsite office space for Property Management, leasing, and social service providers. The central green space of the site is connected to Rose Hill Park to the north via a pedestrian walkway between Buildings A and B. Bicycle storage areas would be included in the basement level of Building A. Buildings C and D can access Ernest E. Debs Regional Park directly from their main entry walkways located off of Boundary Avenue. All buildings either connect directly to perimeter streets, or, in the case of Buildings E and F, through walkways connecting south to Mercury Avenue. ln accordance with the requirements of the LAMC approximately 137 bicycle parking spaces (Phase I: 60 long-term spaces and six short term; Phase II: 64 long-term spaces and seven short term) would be provided for the proposed residential uses.

As described above, the proposed uses would be supported by 174 automobile parking spaces, which meet the parking requirements as set forth in the LAMC, that would be distributed throughout the Project Site in a combination of surface parking lots and tuck-under parking spaces. Parking areas were located to provide minimal walking distance from parking space to entry lobbies, to accommodate the existing disabled/elderly population. Parking areas are broken into discrete parking lots, to eliminate "drive through" and so residents can clearly identify non-resident vehicles and report them to Management. Management will enforce resident-only parking onsite with the exception of spaces dedicated to management staff and visitors (adjacent to the Management Office/Community Building). The Project would comply with City requirements for providing electric vehicle charging capabilities and electric vehicle charging stations within the proposed parking areas.

2.6.4 Landscaping and Open Space

The central green space includes several discrete activity areas, each with a unique design theme and use. Outdoor space adjacent to the Community Building offers places for social gatherings, and special events and celebrations, with shaded seating areas and BBQ grills for outdoor dining. Areas designed for use by children would feature tot lots for children from 2-12 years of age, teen hard surface play areas, open grassy areas, and experiential play elements that encourage interaction and group play. Other amenities include a community/recreation room, picnic tables, lounge seating, bocce ball area, vegetable garden, adult exercise area, and overlook deck with seating. The landscape design would create a park-like setting for residents. Refer to **Figure 2.6-2** for details.

In the comment letter from Darryl Ford (Ford, 2018, City of Los Angeles Department of Recreation and Parks) regarding the proposed Project, it states: "We encourage the applicant to link with nearby recreation and park facilities and consider mutually beneficial partnerships between park programs, operations, and improvements." In response to the recommendation of the City of Los Angeles Department of Recreation and Parks, the Project would include the Project Design Feature (PDF) listed below.

Project Design Feature

Recreation and Parks PDF-1: Not less than 90 days prior to the anticipated construction completion the Project Applicant will reach out to the City of Los Angeles Department of Recreation and Parks staff responsible for the programming (if any) at various neighborhood, community, and regional parks located within a 2-mile radius of the Project site to consider mutually beneficial partnership between park programs, operations, and improvements. These parks and recreation facilities include, but are not limited to, El Sereno Arroyo Playground, El Sereno Community Gardens, Henry Alvarez Memorial Park, Hermon Dog Park, Hermon Park, Arroyo Seco Park, Carlin G. Smith Recreation Center, Cypress Recreation Center, Cypress Recreation Center, Downey Recreation Center, Ascot Hills Park and Charles F. Lummis Home.

As detailed in the Preliminary Landscape Plan for the Project, the landscape design theme would complement the architectural style and would be California Eclectic with a selection of drought tolerant and low maintenance plant materials. The plants would be in conformance with the requirements of the high Fire Hazard Severity Zone. Plant selections are based on their aesthetic/horticultural value, durability, low water use, low maintenance, and fire-retardant characteristics. Tree selections are London Plane trees, Fern Pine, Palo Verde, Olive, Mesquite, African Sumac, Marina Strawberry Tree. Crape Myrtle, Jacaranda and Gold Medallion trees were selected for visual accent. All landscape areas would conform to the City of Los Angeles Landscape Ordinance.

Water-efficient irrigation, such as dripline emitter tubing, would be used in planting areas and dedicated low-flow bubblers would be utilized for irrigation of trees. Irrigation system improvements would include new weather based "Smart' controller" and a dedicated irrigation water meter. The irrigation methods for the Project would meet and exceed the City of Los Angeles Landscape Ordinance for water conservation. The water delivery systems have been designed in conformance with Hydrozone requirements for accurate calibration of water conservation design methods.

2.6.5 Lighting and Signage

The Project will include low-level exterior lighting that will be located on the buildings, and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated throughout the Project Site. All lighting would comply with current energy standards and codes as well as design requirements while providing appropriate light levels. Project lighting would be designed to provide efficient and effective onsite lighting while minimizing light trespass from the Project Site, reducing sky glow, and improving nighttime visibility through glare reduction. Where appropriate, interior lighting would be equipped with sensors or timers that would turn lights off when no one is present. All exterior and interior lighting would meet high energy efficiency requirements utilizing light-emitting diode (LED) or efficient fluorescent lighting technology. New street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would be approved by the Bureau of

Street Lighting in order to maintain appropriate and safe lighting levels on both sidewalks and roadways while minimizing light and glare on adjacent properties.

Proposed signage would be designed to be aesthetically compatible with the proposed architecture of the Project Site and with the requirements of the Los Angeles Municipal Code. Proposed signage would include identity signage, either blade or monument, near the Management Office/Community Building, building and tenant signage, and general ground level and wayfinding pedestrian signage. No off-premises or billboard advertising is proposed as part of the Project. The Project would not include signage with flashing, mechanical, or strobe lights. Project signage would be illuminated via low-level low-glare external lighting, internal halo lighting, or ambient light. Exterior lighting for Project signage would comply with light intensities set forth in the LAMC and as measured at the property line of the nearest residentially zoned property.

2.6.6 Fencing and Security

Fencing would be located between buildings. The central green area would be fenced from the street, and pedestrian walks accessing perimeter streets would have combination of hedges and fencing to clearly define paths of access. Refer to **Figure 2.6-3** which is the fence and gate plan for the Project. As detailed in this plan, a five-foot tubular steel fencing is proposed on the interior of the Project Site to provide security and maintain resident access to the Project Site.

The site will have security features including: cameras and controlled access to mid-rise buildings. Ground rules will be established by the property management company (Related Management Company) and onsite maintenance staff will keep the property clean. Refer to **Figure 2.6-3**, which shows areas where secured access to the Project Site is located. Secured building entry points and pedestrian security gates are located throughout the Project Site.

Figure 2.6-2
PRELIMINARY LANDSCAPE PLAN

Disclaimer: Illustration provided by Withee Malcolm Architects, who has indicated that the information is true and correct. No other warranties are expressed or implied

Source: Withee Malcolm Architects, March 2019

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Preliminary Landscape Plan

Figure 2.6-3
PEDESTRIAN FENCE AND GATE PLAN

Disclaimer: Illustration provided by Withee Malcolm Architects, who has indicated that the information is true and correct. No other warranties are expressed or implied

Source: Withee Malcolm Architects, March 2019

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Rose Hill Courts Redevelopment

Pedestrian Fence/Gate Plan

2.6.7 Sustainability Features

The proposed Project has been designed based on principles of smart growth and environmental sustainability by increasing the residential density onsite, creating an emphasis on walkability and access to public open space, with proximity to nearby retail, educational and transit amenities. In addition to being located near existing infrastructure needed to serve the proposed uses, the new buildings would be designed and constructed to incorporate environmentally-sustainable design features under Build It Green's "GreenPoint Rated" system. "Green" principles would be incorporated throughout the Project to comply with the City of Los Angeles Green Building Code (Ordinance No. 184,692). Such Project design features (PDFs) would include energy-efficient buildings and water conservation and waste reduction measures, among others. The new buildings would include water and energy efficient fixtures and appliances such as high-efficiency toilets and shower heads, high-efficiency Energy Star appliances, and energy efficient LED lighting as appropriate. The Project would also utilize sustainable planning and building strategies and would incorporate the use of environmentally-friendly materials, such as non-toxic paints and recycled finish materials wherever possible.

In accordance with CEQA Guidelines Appendix F**, Section 4.15,** Energy, of this Draft EIR provides further information regarding energy-consuming equipment and processes that would be used during construction and operation of the Project, energy requirements of the Project, energy conservation equipment and design features of the Project, energy supplies that would serve the Project, and total estimated daily vehicle trips that would be generated by the Project.

As discussed in Section 4.6, Green House Gas Emissions, the Project would comply with the Los Angeles Green Building Code, which is based on the 2016 California Green Building Standards Code (CalGreen) (Part 11 of Title 24, California Code of Regulations). The following are proposed energy conservation measures or PDFs that are beyond the minimum requirements of the Los Angeles Green Building Code:

Energy Conservation and Efficiency

GHG-PDF-1: Project design will provide an energy efficiency exceeding Title 24, Part 6, California Energy Code baseline standard requirements, based on the 2016 Building Energy Efficiency Standards requirements.[5]

GHG-PDF-2: Use of high-efficiency Energy Star appliances, where appropriate.

Water Conservation

GHG-PDF-3: Inclusion of water conservation measures in accordance with the Los Angeles Department of Water and Power requirements for new development in the City of Los Angeles (e.g., high-efficiency fixtures and appliances, weather-based irrigation systems, drought-tolerant landscaping).

GHG-PDF-4: Use of drought-tolerant plants and indigenous species, stormwater collection, permeable pavement wherever possible, and stormwater filtration, storage and re-use for landscaping.

5 For analysis purposes, a value of 10% more efficient than Title 24 was used in the CalEEMod model.

GHG-PDF-5: Use of high-efficiency toilets, including dual-flush water closets, as appropriate.

GHG-PDF-6: Use of high-efficiency showerheads at 1.5 gallons per minute. Install no showers with multiple showerheads.

GHG-PDF-7: Use of weather-based irrigation controller with rain shutoff, matched precipitation (flow) rates for sprinkler heads, and rotating sprinkler nozzles or comparable technology such as drip/micro spray/subsurface irrigation where appropriate.

GHG-PDF-8: Installation of a separate water meter (or submeter), flow sensor, and master valve shutoff for irrigated landscape areas totaling 5,000 square feet and greater.

GHG-PDF-9: Use of proper hydro-zoning and turf minimization, as feasible.

Water Quality

GHG-PDF-10: Installation of pre-treatment stormwater infrastructure for the stormwater treatment system.

GHG-PDF-11: Reduce stormwater runoff through the introduction of new landscaped areas throughout the Project Site and/or on the structure.

Air Quality

GHG-PDF-12: Prohibit the use of any fireplaces in the proposed residential units.

2.7 Project Construction and Scheduling

Project construction is anticipated to occur in 2021 for Phase I and 2022 for Phase II. Construction activity for Phase I would commence with any necessary remediation of lead and asbestos, followed by demolition of seven existing structures and associated surface parking lot area, followed by grading and excavation. Building foundations would then be laid, followed by building construction, paving/concrete installation, and landscape installation. Phase II would follow similar steps, except with more buildings to be demolished and a greater site area, the remediation, demolition, excavation/grading phases, and landscaping phases would likely be longer, and the building construction phase shorter. Project construction, which would be approximately 18 months per phase, is anticipated to be completed in 2022 for Phase I and 2024 for Phase II. Workforce will vary based on the scheduled activities to over 100 at peak with an average of 40 to 60 workers per day.

2.7.1 Relocation Plan

As will be described in more detail in the Relocation Plan that will be prepared for Rose Hill Courts, the Project will involve relocating the current households while the demolition and new construction occurs. A two-phase approach to the redevelopment is being utilized to minimize the amount of time offsite for the residents. Phase I involves the demolition of 20 units, 15 of which are currently occupied (as of January 2019). Once the existing buildings on the Phase II portion of the site are vacated, demolition and construction of Phase II can begin.

Currently, Rose Hill Courts is a federal public housing development under an annual contribution contract ("ACC") with HUD that provides that the residents pay no more than 30 percent of their

income on rent and the balance, to a point, is made up by the Federal government based on a national formula. HUD Funding for public housing units does not provide sufficient funds for maintenance, renovation or redevelopment. The amount of funding that HACLA receives for public housing units on a per-unit basis is less than what it receives for units assisted under the Section 8 program. The redevelopment of Rose Hill Courts would be made possible by converting the HUD assistance from public housing funding to Section 8 Housing Choice Voucher funding pursuant to the Rental Assistance Demonstration ("RAD") program and the Project Based Voucher ("PBV") program. The Section 8 program provides rental subsidy from HUD that, in the case of RAD, is more stable than ACC funding from a federal appropriations perspective, and, in the case of the PBV program, generates more operating income that supports debt and investment from private and public institutions to pay redevelopment costs.

In order to minimize displacement of in-place families in redevelopment efforts, the PBV program permits housing authorities to add these existing families to the Section 8 waiting list and, once the families' continued eligibility is determined, they can be "given an absolute selection preference and referred to the project owner for an appropriately sized PBV unit in the project." In other words, the families' right to return is conditioned on the existence of a "right-sized" unit. In addition, the PBV program rules require that "the contract unit leased to each family must be appropriate for the size of the family under the PHA's subsidy standards." If a family is occupying a "wrong-sized unit," HUD requires PHAs to offer the family either PBV assistance "in an appropriate-size unit (in the same project or in another project)" or "other project-based housing assistance (e.g., by occupancy of a public housing unit)." Unlike the tenant-based Housing Choice Voucher program, a PBV occupant cannot elect to spend more than 30 percent of their income towards rent in order to rent a larger unit. Given that the rehabilitation-only scenario would not allow for a substantially altered unit mix, the application of the PBV rules would mean that the existing occupants could not return to the site and many over-housed families would be displaced. By contrast, the Project includes housing units designed to meet the needs of the current resident population, thus avoiding displacement, and calls for the development of 85 additional units on the site appropriate to larger families, thus addressing a critical housing need in the City.

In addition to complying with all federal and state statutes and regulations for relocation, HACLA and the Project Applicant jointly pledge to provide the residents of Rose Hills Courts with professional relocation assistance. Prior to the start of construction, HACLA will adopt a Relocation Plan. The Plan will identify temporary relocation requirements, special needs and preferences for the households and the policies and procedures HACLA will follow. The relocation consultant will also conduct interviews with each household prior to any relocation activities. The residents who live in Phase I will be provided with the opportunity to move into an un-impacted unit onsite if a unit is available, or to offsite accommodations while Phase I is being constructed. Once Phase I is complete, any residents that were temporarily housed offsite will have first priority to move into Phase I and those families who live in the occupied units of Phase II's footprint will be able to move directly from their unit into a completed unit in Phase I based on seniority or tenancy at Rose Hill Courts. For each phase, households currently residing in either over-housed or under-housed conditions will be matched into a correctly-sized replacement unit as per applicable Section 8 occupancy standards. All families will receive counseling on their relocation rights and options as well as moving assistance.

2.8 Necessary Approvals

Approvals required for development of the Project may include, but are not limited to, the following:

Table 2.8-1
PERMITS AND APPROVALS

Agency	Permit or Approval
Housing Authority of the City of Los Angeles (HACLA) CEQA Lead Agency	• Certification of the EIR • Approval of Disposition and Development Agreement • Approval of Relocation Plan for Residents • Project-based Section 8 vouchers
City of Los Angeles	• Demolition and Building Permits, including approval for demolition of historic buildings • Public Benefit Project with Alternative Compliance (PUB) under Los Angeles Municipal Code § 14.00B • Affordable Housing Density Bonus (SB 1818) as identified in LAMC § 12.22 A.25: Request is to allow a Density Bonus project with off-menu incentives. • Lot Tie/Lot Line Adjustment Process due to Phase I and II being on separate lots. • Permit for the removal of street trees (if required) • Haul Route approval (if necessary)
Utilities	• Utility coordination and permits
United States Department of Housing and Urban Development (Delegated to HCID)	• NEPA Part 58 Compliance/ Adoption of the EIS
HUD	• Section 18 Demolition and Disposition of existing Rose Hill Courts • Rental Assistance Demonstration (RAD) Conversion

SECTION 3.0 – ENVIRONMENTAL SETTING

3.0 ENVIRONMENTAL SETTING

3.1 Overview of Environmental Setting

This section describes the existing conditions within the study area for a suite of applicable environmental resources, as required under CEQA. For the purpose of analysis in this document, the study area includes the proposed project site and the immediately surrounding area, depending on the environmental issue being analyzed.

Details regarding existing conditions and resources in the study area are described briefly below for each environmental topic in sections **4.1** through **4.15** of this document. Refer to each of the respective topical sections for additional information. General existing conditions are described first, followed by specific descriptions for existing environmental resources within and nearby the project site. Some environmental resources (such as air quality) cannot be described specifically for the project site alone. To analyze existing conditions for these types of resources, a general description is provided for the environmental topic being discussed. For example: the baseline setting description for air quality includes a general description of existing air quality within the air basin where the project is located.

The following methodology and resources were used for collecting the baseline setting information provided in this EIR/EIS:

- Review of existing literature and data available on various public agency websites such as the Southern California Association of Governments (SCAG), Los Angeles Department of City Planning, California Department of Transportation, Los Angeles Department of Transportation, etc.

- Data collected during a site visit conducted by UltraSystems staff members.

- Technical reports that have been prepared to analyze potential project impacts.

3.2 Project Location and Surrounding Uses

The project site comprises approximately 5.24 acres in the community of El Sereno in the City of Los Angeles. The project site is bounded by Florizel Street to the north; McKenzie Avenue to the east; Mercury Avenue to the south; and Boundary Avenue to the west. A driveway runs in an east-west direction across the middle of the project bisecting it into two parts; the northern part and the southern part.

The area surrounding the project site is urbanized and developed. Land uses surrounding the project site include the Ernest E. Debs Regional Park to the west, along Mercury Avenue and Boundary Avenue; Rose Hill Park to the north; the Rose Hill Recreation Center to the southeast. Our Lady of Guadalupe Catholic Church and Elementary School is located east of the project site, along Browne Avenue. Single-family and multi-family residential developments are located to the south and east of the project site.

3.3 Existing Project Site Conditions

3.3.1 Existing Conditions

The project site consists of Rose Hill Courts, a public housing complex developed by the Los Angeles Housing Authority (HACLA) in 1942. The complex was formally determined eligible for listing in the National Register of Historic Places (National Register) as a historic district in 2003 through the federal review process under Section 106 of the National Historic Preservation Act. As such, it was automatically listed in the California Register of Historical Resources (California Register). Properties that are listed in the California Register are historical resources defined by CEQA. The project site is currently developed with a total of 15 buildings, comprised of 14 residential buildings with 100 multi-family units, and one administration building (GPA Consulting, 2018, p. 1).

The property is on a slope; the northwest end is the highest point and the southeast end is the lowest point. Landscaping on the project site consists of grassy open areas with mature trees and shrubs, as well as concrete planters. The buildings are rectangular or square in plan and are generally arranged in parallel groupings. The north block includes the administration building facing Florizel Street. To the west of the administration building there are three rectangular residential buildings, and to the east are one rectangular, and four square residential buildings. The south block includes six rectangular residential buildings. Parking for the complex consists of surface spaces situated in a paved area along Victorine. There are five building types on the site. All of the buildings are one or two stories in height, with wood-frame construction, concrete slab foundations, and composition roofing. **Table 3.3-1** lists the types of buildings, the number of each building type, and how many residential units in each type (GPA Consulting, 2018, p. 15).

Table 3.3-1
BUILDING TYPES

BUILDING TYPES		
Building Type	**Number of Building Type**	**Number of Units in Type**
A	2	10
B	1	6
C	6	10
D	4	2
E	1	6

3.3.2 Existing Land Use and Zoning

As detailed in Section 4.8, the land adjacent to the Project Site has a General Plan land use designation of 130 Low Single Family Residential to the north, south, and west and a General Plan land use designation of 500 Open Space to the east and west. Land adjacent to the Project Site has a zoning designation of One-Family Residential (R1) to the north and south, OS Open Space (OS) to the east and west, and Residential Estate (RE9) to the west.

According to the City of Los Angeles General Plan Land Use Map, the project site is designated as 130-Low Single-Family Residential. According to Community Plan, the project is designated as Residential Single-Family land use. The site is zoned for residential uses with a zoning designation of [Q]R1-1D. The site is zoned [Q]R1-1D. The "[Q]" represents a permanent [Q] Qualified Classification

that establishes development standards relating to infrastructure, building design, retaining walls, landscaping, and environmental considerations. The "D" represents a "D" Development Limitation that limits building height and FAR. The project site has a current zoning designation for single-family residential development; however, the project proposes multi-family development and will require Public Benefits Project Alternative Compliance approval under LAMC Section 14.00.B. The site is zoned for residential uses with a zoning designation of [Q]R1 1D (One Family Dwelling, Height District 1D). Therefore, the Rose Hill Courts development is an existing non-conforming use because the existing development has multi-family housing units which were constructed before the site was downzoned to R1 in 2000.

3.3.3 Land Use Plans

The site is located within the Community Plan, in the El Sereno neighborhood area of the City of Los Angeles. City of Los Angeles land use plans applicable to the project include the City of Los Angeles General Plan, including the Framework Element, the Community Plan, and the Citywide Urban Design Guidelines.

Regional plans that are applicable to the project include the Southern California Association of Governments (SCAG) Regional Comprehensive Plan, SCAG Regional Transportation Plan/Sustainable Communities Strategy, South Coast Air Quality Management District's Air Quality Management Plan and Metro Congestion Management Program.

Aesthetics

The project site is located in the community of El Sereno, in the northeastern part of the City of Los Angeles, which is characterized by hilly topography and urban development. Dominant natural visual resources in the project vicinity comprise scenic vistas of numerous hillsides in the project area, natural open spaces and park lands including the Ernest E. Debs Regional Park and Rose Hill Park to the north and Rose Hill Recreation Center to the south.

Due to hilly topography, scenic views incorporating the project site are available from public thoroughfares and open spaces in the vicinity of the project. In general, public views include scenic views and vistas of nearby and distant hillsides incorporating the built environment and natural open spaces in the surrounding area. Private views in the project vicinity (i.e., views from surrounding developments), are similar to public views, but are more restricted by landscaping, numerous trees and existing structures.

Air Quality

The project site is in the City of Los Angeles, which is in the South Coast Air Basin. The distinctive climate of the South Coast Air Basin is determined by its terrain and geographic location. The general region lies in the semi-permanent high-pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average wind speeds. The usually mild climatological pattern is interrupted occasionally by periods of extremely hot weather, winter storms, or Santa Ana winds.

Biological Resources

The project site is characterized as urban developed with ornamental trees and shrubs throughout. Land uses surrounding the site include residential development to the south and east and natural open space, regional recreational park lands, and equestrian trails to the north and west. The area is characterized by its numerous steep hills and vistas, as well as the Ernest E. Debs Regional Park to the west, which is the fourth largest park in the City of Los Angeles. The park contains a mosaic of native vegetation communities such as buckwheat scrub, walnut woodland, and oak woodland. The park also contains many other non-native ornamental trees, shrubs, manicured lawns, and a small community garden. No sensitive plant or wildlife species were observed within the biological study area during the 2018 field survey. Therefore, focused protocol surveys for plants or wildlife are not required and were not conducted for this project.

Cultural Resources

The Rose Hill Courts apartment complex was formally determined eligible for the National Register and is therefore listed in the California Register. A cultural resource records and literature search was conducted in November 2016, utilizing a half mile buffer around the project site. A pedestrian field survey to check for the presence of cultural resources was conducted on May 23, 2018. The result of the pedestrian survey was negative for both prehistoric and historic archaeological sites, features and isolates. No prehistoric or historic archaeological resources were observed during the pedestrian field survey. The previous cultural resources surveys within the half mile buffer zone resulted in no archaeological sites or isolates being recorded. The fully built environment of the project site and elevation relative to adjacent roads suggests that ground here has been significantly cut and filled, with no original surface soil is remaining. A single historic property was identified within the half mile buffer zone, but it is not within the area of potential effect (APE). The historic property is the Soto Street Bridge over Mission Road and Huntington Drive South (P 19 188230). Built 1936–38, the bridge carries Soto Road over Mission Road and Huntington Drive South. Refer to Section 4.4 for details. The field survey conducted for this project observed no historic artifacts or features. The potential for subsurface cultural and or historical deposits is minimal based on the above findings.

Energy

Electricity is provided to the project site by the Los Angeles Department of Water and Power (LADWP) from existing underground electrical service lines. In 2017, the LADWP's power portfolio comprised 30 percent renewable energy (including one percent biomass, four percent geothermal; four percent small hydroelectric; 11 percent solar; and 10 percent wind). Thirty-one percent of the power is from natural gas, 10 percent is from nuclear power, four percent is from large hydroelectric sources; 18 percent is from coal and seven percent is from other/unspecified sources of power (LADWP, 2017a).

Natural gas is provided to the project site by the Southern California Gas Company (SoCalGas). More than 90% of the natural gas used in California is produced from basins in Texas and New Mexico. SoCalGas has a "network of transmission pipelines and four interconnected storage fields to deliver natural gas to nearly 6 million residential and business customers" (SoCalGas, 2019).

Geology and Soils

The proposed project is in the Repetto Hills, which trend northwest to southeast along the northeastern edge of the Los Angeles Basin. The Repetto Hills are composed of folded and faulted Miocene-age sedimentary (i.e., sandstone, mudstone, siltstone, conglomerate) bedrock of the Puente Formation that has been uplifted and incised by elevated floodplains and uplifted alluvial deposits. Miocene-age sedimentary bedrock of the Puente Formation was identified during the geotechnical investigation at depths of 14.5 feet and 47 feet. This bedrock was identified as olive-grey sandstone and silty sandstone and was characterized as being soft (H2) to medium hard (H3), slightly moist, massive to thinly bedded, and moderately to highly weathered (Geocon West, Inc.). Most of the study area is comprised of Urban land soils, which are generally defined as *discontinuous human-transported fill* mapped as occurring in varying ratios with other soil types. Only one soil type mapped within the study area does not contain Urban land soils: Ballona-Typic Xerorthents, fine substratum complex, 0 to 5 percent slopes (Web Soil Survey, 2017). Additionally, the study area is located in a seismically active zone where approximately 30 earthquakes of generally low 2 Richter magnitude occur daily (below 2.0).

Greenhouse Gas Emissions

The project site is developed with residential land uses. Greenhouse gas (GHG) emissions are currently generated by the use of on-road motor vehicles, energy (electricity and natural gas), water, and generation of solid waste and wastewater. As detailed in the GHG Emissions section of this document, GHG emissions generated by the existing uses at the project site have been estimated utilizing the California Emissions Estimator Model (CalEEMod), Version 2016.3.2 (CAPCOA, 2017) recommended by the South Coast Air Quality Management District (SCAQMD).

Hazards and Hazardous Materials

The project includes the demolition of 14 existing buildings comprised of 100 residential apartments, and one administration building. As detailed in the Phase I Environmental Site Assessment Report conducted in April 2018 for the project site by Altec Testing & Engineering, Inc. (Altec), several technical studies were conducted for the project site, which indicated the existing and/or previous presence of hazardous materials including lead and asbestos. The Project is in an area with a moderate potential for radon gas. The existing conditions are consistent with aging housing stock, including some elevated lead levels in the soil, areas of termite damage to the wood-framing, and aging utilities and infrastructure.

Land Use

The site is located within the Community Plan, in the El Sereno neighborhood area of the City of Los Angeles. The existing public housing complex is comprised of 15 structures. Fourteen structures consist of 100-multi-family units, and one structure is an administration building with offices and a common room with a kitchen, pantry, and two bathrooms. From a localized perspective, Rose Hill Courts is located within the community of El Sereno. Land uses surrounding the project site include the Ernest E. Debs Regional Park to the north and west, along Boundary Avenue; Rose Hill Park to the north; the Rose Hill Recreation Center to the southeast. Our Lady of Guadalupe Catholic Church and Elementary School is located east of the project site, along Browne Avenue. Single-family and multi-family residential developments are located to the south and east.

Noise

The predominant source of noise in the project area is motor vehicle traffic. The Arroyo Seco Parkway (SR-110) is 4,570 feet northwest of the project site. The nearest major thoroughfare is Huntington Drive, which is classified as a Boulevard II, is southeast of the project site. On Wednesday, May 23, 2018, UltraSystems conducted ambient noise sampling at five locations in the general project area, the results of which are detailed in the noise section of this document. Ambient noise levels at all the points measured are typical of a residential setting.

Population and Housing

The project site is within the Community Plan area. Northeast Los Angeles has approximately 237,000 residents and 78,000 dwelling units (City of LA Dept Planning, 2016b). Rental units in the community house an average of 3.13 persons per unit and owner-occupied units house an average of 3.15 persons per unit. The existing project site contains 100 units and has an existing (January 2019) population of 221 residents.

Public Services

The LAFD provides fire protection and emergency services to the project site. The project site is served by LAFD Station No. 47 located at 4574 Huntington Drive South, located approximately 0.25 mile southeast of the project site. LAPD provides primary police protection services in the City of Los Angeles, an area of approximately 473 square miles with a population of approximately 4,007,905 people (LAPD 2018a).

Multiple recreational facilities exist in the project vicinity. The project site is located adjacent to (across Florizel Street) Rose Hill Park (Google Earth Pro, 2018), and is approximately 200 feet from the Rose Hill Recreation Center, located at 4530 Mercury Avenue. The recreation center offers: barbecue pits, baseball diamond, basketball courts, children's play area, picnic tables, and multipurpose sports field, as well as fitness and after-school programs (City of Los Angeles Department of Recreation and Parks, 2018c). The project site is located approximately 0.27 mile from Ernest E. Debs Regional Park, at 4235 Monterey Road (Google Earth Pro, 2018). This park offers barbecue pits, picnic tables, bike paths, hiking trails and a pond (City of Los Angeles Department of Recreation and Parks, 2018d).

Library services within the City are provided by the Los Angeles Public Library (LAPL). Approximately 6.9 million books and other materials comprise the LAPL collection (LAPL, 2018a). The project site is 1.3 miles southwest of the El Sereno Branch Library, located at 5226 S. Huntington Drive (Google Earth Pro, 2018). This 4,274 square-foot library opened in 2004. Other nearby branches include the Arroyo Seco Regional Library, the Lincoln Heights Branch Library, and the Malabar Branch Library (LAPL, 2018b). The State of California standard is based upon 0.5 square feet of library facility per capita (City of Los Angeles, 2006).

Recreation

The Northeast Los Angeles Community in which the project is located maintains 39 recreational facilities. This includes 15 parks, 23 recreation centers, and 1 golf course (City of Los Angeles Geohub, 2016). Recreational facilities within the immediate vicinity of the project include several nearby local parks and recreational centers (i.e., Ascot Hills Park, El Sereno Recreational Center, Montecito Heights Recreational Center and Senior Citizen Center, Ramona Hall Community Center, Rose Hill

Park, Rose Hill Recreation Center, and Sycamore Grove Park). Many of these recreational facilities are within walking distance of the project site, and these facilities typically include sport programs (i.e., baseball, softball), and other programs such as arts and crafts, pre-school programs, after-school programs and senior clubs.

Transportation

As detailed in the transportation section of this document, the key roadways that serve the project site are as follows: Browne Avenue, Mercury Avenue, Huntington Drive North, Huntington Drive, Topaz Street, Boundary Avenue, McKenzie Avenue, and Monterey Road. The roadway network in the vicinity of the project site is served by the Los Angeles County Metropolitan Transportation Authority (METRO). METRO lines 78, 79, 378, 252, and 256 operate within the study area. Regarding existing parking, Victorine is the driveway where current residents of Rose Hill Courts have designated parking via vehicle stickers. Victorine contains a total of 80 parking spaces. As of January 2019, 35 residents are using parking stickers to park along Victorine. Additional parking is available along the streets adjacent to the project site, which include: 1) Florizel Street to the north (both sides of the street), 2) Mercury Avenue to the south (both sides of the street), 3) Boundary Avenue to the west (one side of the street), and 4) McKenzie Avenue to the east (both sides of the street).

Tribal Cultural Resources

The Native American Heritage Commission (NAHC) in Sacramento conducted a search of their Sacred Lands File and provided a list of Native American contacts for the project area in the City of Los Angeles, Los Angeles County. The search of Sacred Lands File at the NAHC failed to identify any traditional cultural properties (refer to Attachment C of **Appendix G1**).

In April 2018, letters were sent by UltraSystems to nine Native American contacts representing seven tribes and bands on the list. The letter described the project and requested information about any traditional cultural properties, sites, or resources about which they may be concerned. Subsequent to the letters, telephone calls were made to all of the tribal contacts. There were five responses by the Native American contacts during the course of the Phase I Cultural Inventory Investigation. Refer to the Tribal Cultural Resources section of this EIR for a more detailed description of existing conditions and onsite conditions related to tribal cultural resources in the project area.

Wildfire

The project site is characterized as urban developed with ornamental trees and shrubs throughout. Land uses surrounding the site include residential development to the south and east and natural open space, regional recreational park lands, and equestrian trails to the north and west. The area is characterized by its numerous steep hills and vistas, as well as the Ernest E. Debs Regional Park to the north, which is the fourth largest park in the City of Los Angeles. The regional park contains a mosaic of native vegetation communities such as buckwheat scrub, walnut woodland, and oak woodland. The park also contains many other non-native ornamental trees, shrubs, manicured lawns, and a small community garden. However, according to the U.S. Forest Service (USFS) mapped Wildland-Urban Interface (WUI) areas, the project site is not located within a WUI area and there are no WUI areas mapped adjacent to or in the vicinity of the project site (USFS, 2019). CalFire is legally mandated to periodically map Fire Hazard Severity Zones on State Responsibility Areas (SRAs), as well as recommend Very High Fire Hazard Severity Zones in Local Responsibility Areas (LRAs). The project site is not located within an SRA Fire Hazard Severity Zone (CalFire, 2007) but it is located

within a Very High Fire Hazard Severity Zone LRA (CalFire, 2012). Refer to **Section 4.14** of the Draft EIR for additional information.

3.4 Related Projects

CEQA Guidelines § 15130(a) requires that an EIR discuss the cumulative impacts of a proposed project, when the project's incremental effect is "cumulatively considerable.". Per § 15065(a)(3) of the CEQA Guidelines: Cumulatively considerable "means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." As detailed in CEQA Guidelines § 15130(a)(3), a project's contribution is less than cumulatively considerable "if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact. The lead agency shall identify facts and analysis supporting its conclusion that the contribution will be rendered less than cumulatively considerable."

CEQA Guidelines § 15130(b) states "The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness, and should focus on the cumulative impacts to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact."

CEQA Guidelines § 15130(b) further states that the following elements are necessary to an adequate discussion of significant cumulative impacts:

(1) Either:

(A) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or

(B) A summary of projections contained in an adopted local, regional, or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such documents shall be referenced and made available to the public at a location specified by the lead agency.

The cumulative analysis conducted for the proposed project considers the growth generated by related projects, as detailed in the traffic report prepared for the proposed project (refer to **Appendix O** to this EIR).

Cumulative impacts are analyzed in terms of cumulative study areas, which can vary depending on the separate environmental impact of each environmental issue area. For example, air quality or greenhouse gas impacts would be viewed on a larger scale (such as the Southern California Air Basin), as opposed to more localized and site-specific and localized mineral resources and aesthetics impacts.

Based on a review of the planned area projects data obtained from the Los Angeles Department of Transportation Development Review, seven area projects were included in the cumulative traffic analysis. **Table 3.4-1** below provides the trip generation estimates for the area projects identified within the City of Los Angeles. The locations of the area projects are depicted in **Figure 3.4-1** below.

Table 3.4-1
ROSE HILL COURTS REDEVELOPMENT CUMULATIVE PROJECTS LIST

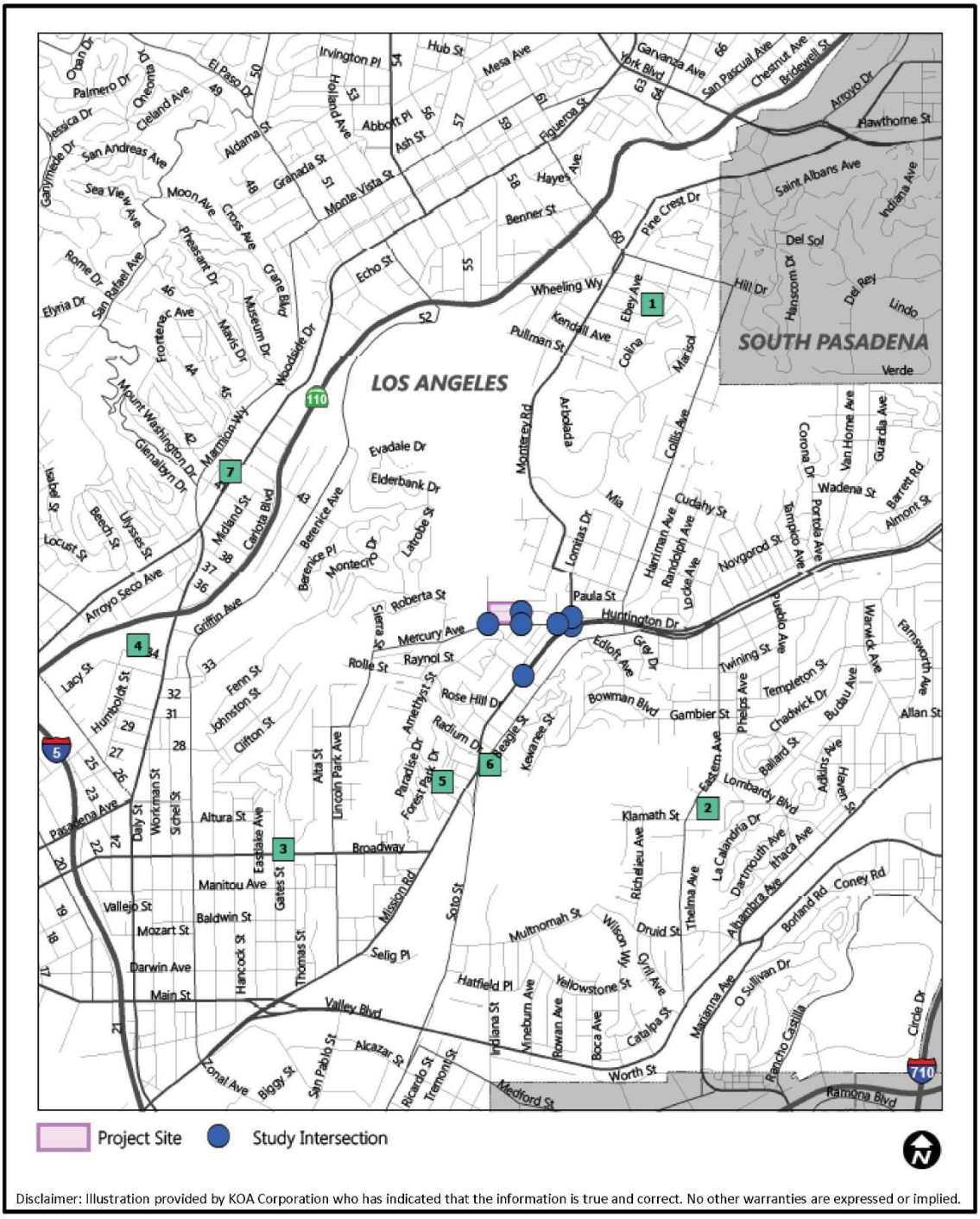
ID	Location	Land Use	Intensity	Units	Daily Total	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total
1	625 E Coleman Avenue	Private College	532	students	1,245	93	25	118	33	76	109
2	2520 N Eastern Avenue	Elementary School Apartments Restaurant	530 20 23230	students d.u. k.s.f.	1,363	167	155	322	62	59	121
3	3303 N Broadway	Medical Office	47.300	k.s.f.	1,384	74	20	94	38	103	141
4	167 W Avenue 34	Apartments Retail Office	410 10.000 30.000	k.s.f. k.s.f. k.s.f.	2,128	29	132	161	133	66	199
5	2730 N Onyx Drive	Single Family Homes	31	d.u.	358	8	23	31	23	14	37
6	4208 E Huntington Drive South	Apartments	90	d.u.	544	25	31	56	23	21	44
7	4201 N Figueroa Street	Apartments Retail	16 7.301	d.u. k.s.f.	395	3	11	14	22	13	35
TOTAL					**6,172**	**306**	**372**	**678**	**301**	**276**	**577**

Source: Location of area projects and trip generation are provided by LADOT.

Historic Architectural Resources

As discussed in the Historical Resource Technical Report prepared for the Project (GPA, 2018), GPA determined that, "including Rose Hill Courts, there are at least 34 public and private garden apartment complexes in Los Angeles, … (and that many) of the complexes are listed or identified as eligible for listing in a historical resources survey" (2018:30). Rose Hill Courts was one of the first ten projects constructed by HACLA, the others being Ramona Gardens, Pico Gardens, Pueblo del Rio, Rancho San Pedro, Aliso Village, Estrada Courts, William Mead Homes, Avalon Gardens, and Hacienda Village (now Gonzaque Village). HACLA currently has no planned projects for its other garden apartment complexes. Its "Vision Plan" identifies several for possible redevelopment and significant rehabilitation/partial redevelopment based upon the scoring criteria. As the Vision Plan is a long-range plan to preserve and expand affordable housing over the next 25 years, it is reasonably foreseeable that one or more of the HACLA complexes … could be redeveloped, partially redeveloped, and/or significantly rehabilitated" (GPA, 2018:30).

Figure 3.4-1
CUMULATIVE PROJECT LOCATIONS



Sources: KOA Corporation, July 2018

UltraSystems
environmental•management•planning

Rose Hill Courts Redevelopment

Cumulative Project Locations

SECTION 4.0 - ENVIRONMENTAL IMPACT ANALYSIS

4.1 Aesthetics

4.1.1 Introduction

This section of the Draft EIR provides an analysis of the Project's potential impacts with regard to aesthetics and visual resources. Specifically, this section analyzes the Project's impacts on existing visual character or quality of public views of the site and its surroundings. This section also evaluates the Project's consistency with applicable regulations governing scenic quality.

4.1.2 Environmental Setting

4.1.2.1 Regulatory Framework

Federal

There are no federal regulations that pertain to this issue area.

State

There are no state regulations that pertain to this issue area.

Local

<u>City of Los Angeles General Plan</u>

The City of Los Angeles' Citywide General Plan Framework Element establishes the broad overall policy and direction for the entire General Plan and provides a citywide context and a comprehensive long-range strategy to guide the comprehensive update of the General Plan's other elements (City of Los Angeles Department of City Planning, 2018a).

The General Plan Framework Element is a strategy for long-term growth that sets a citywide context to guide the subsequent amendments of the City's community plans, zoning ordinances, and other pertinent programs. This element of the City's General Plan includes Chapter 5, Urban Form and Neighborhood Design. The Urban Form and Neighborhood Design chapter contains a goal of creating a livable city for existing and future residents.

The General Plan Framework Element defines "urban form" as (a) the "general pattern of building height and development intensity" and (b) the "structural elements" that define the City physically, such as natural features, transportation corridors (including the planned fixed rail transit system), open space, public facilities, as well as activity centers and focal elements. "Neighborhood design" is defined as "the physical character of neighborhoods and communities within the city.". The Urban Form and Neighborhood Design Chapter of the Framework Element's intent is to build on each neighborhood's attributes, emphasize livability for existing and future residents, and reinforce the connectivity of the neighborhoods to a citywide structure (City of Los Angeles Department of City Planning, 2018a). The Framework Element does not address the design of individual neighborhoods or communities, directly. It provides neighborhood design and implementation programs that guide local community planning.

City of Los Angeles Walkability Checklist

The City of Los Angeles Walkability Checklist for Site Plan Review (i.e., Walkability Checklist) is a program for implementation of the urban design principles identified in the Urban Form and Neighborhood Design Chapter of the Framework Element. The Walkability Checklist encourages pursuit of high-quality City form and has been incorporated into the Citywide Design Guidelines. It informs stakeholders about the tools and techniques that improve curb appeal, beauty, and usability through a location-specific approach (City of Los Angeles Department of City Planning, 2008). The purpose of the Walkability Checklist is to guide the City of Los Angeles Department of City Planning staff, developers, architects, engineers, and all community members in creating enhanced pedestrian movement, access, comfort, and safety–contributing to the walkability of the City. The Walkability Checklist provides a list of recommended strategies that projects should employ to improve the pedestrian environment in the public right-of-way and on private property. The checklist is not a requirement and is not part of the zoning code. However, it serves as a guide for consistency relating to the policies contained in the General Plan Framework Element (City of Los Angeles Department of City Planning, 2008, p. 1). Different components related to walkability and pedestrian experience discussed in the Walkability Checklist include building orientation, building frontages, signage and lighting, landscaping, off-street and on-street parking, driveways, sidewalks, cross-streets/street crossings, utilities, street connectivity, access to transit, aesthetics, and street furniture.

Residential Citywide Design Guidelines

The City's General Plan Framework Element and each of the City's 35 Community Plans promote architectural and design excellence in buildings, landscape, open space, and public space. They also stipulate that preservation of the City's character and scale, including its traditional urban design form, shall be emphasized in consideration of future development. To this end, the Citywide Design Guidelines have been created to carry out the common design objectives that maintain neighborhood form and character while promoting design excellence and creative infill development solutions. (City of Los Angeles Urban Design Studio, n.d.).

The Citywide Design Guidelines implement the 10 Urban Design Principles, a part of the Framework Element. These principles are a statement of the City's vision for the future of Los Angeles and provide guidance for new development. The principles encourage projects to complement existing urban form to enhance the built environment in Los Angeles. While called "urban," the Urban Design Principles reflect citywide values to be expressed in the built environment of the City, establishing a design program for the City (Los Angeles Department of City Planning, 2011, p. 3). The 10 principles of urban design identified in the Citywide Design Guidelines are as follows:

1. Develop inviting and accessible transit areas.
2. Reinforce walkability, bikeability, and well-being.
3. Nurture neighborhood character.
4. Bridge the past and the future.
5. Produce great green streets.
6. Generate public open space.

7. Stimulate sustainability and innovation in the city.

8. Improve equity and opportunity.

9. Emphasize early integration, simple processes, and maintainable solutions.

10. Ensure connections.

City of Los Angeles Municipal Code Lighting Requirements

Lighting is regulated by several chapters of the Los Angeles Municipal Code (City of Los Angeles Municipal Code, 2018). Applicable lighting regulations include:

- Chapter 1, Article 2, § 12.21-A,5(k). All lights used to illuminate a parking area shall be designed, located and arranged so as to reflect the light away from any streets and adjacent premises.

- Chapter 1, Article 7, § 17.08-C. Plans for street lighting shall be submitted to and approved by the Bureau of Street Lighting.

- Chapter 1, Article 4.4, § 14.4.4(E). No sign shall be arranged and illuminated in a manner that will produce a light intensity of greater than three foot-candles above ambient lighting, as measured at the property line of the nearest residentially zoned property.

- Chapter 9, Article 3, § 93.0117(b). No person shall construct, establish, create, or maintain any stationary exterior light source that may cause the following locations to be either illuminated by more than two foot-candles of lighting intensity or receive direct glare from the light source. Direct glare, as used in this subsection is a glare resulting from high luminances or insufficiently shielded light sources that is in the field of view: 1. Any exterior glazed window or sliding glass door on any other property containing a residential unit or units. 2. Any elevated habitable porch, deck or balcony on any other property containing a residential unit or units. 3. Any ground surface intended for use but not limited to recreation, barbecue, or lawn areas on any other property containing a residential unit or units.

Northeast Los Angeles Community Plan

The Project Site is located within the Northeast Los Angeles Community Plan Area (Community Plan), which encompasses the hills and valleys lying east of the Los Angeles River and north of the Boyle Heights Community Plan area (City of Los Angeles, 2016, p. I-1). The Community Plan is one of 35 Community Plans in the City of Los Angeles. These plans guide the physical development of neighborhoods by establishing goals and policies for land use. As a whole, the community plans provide the specific, neighborhood-level detail, relevant policies, and implementation strategies required to achieve the objectives of the City's General Plan.

One of the purposes of the Community Plan is to: preserve and enhance the positive characteristics of existing uses and ensuring that future developments improve the identity and appearance of neighborhoods and communities by providing guidance regarding scale, height, bulk, setbacks, design, and landscaping (City of Los Angeles, 2016, p. III-3).

The Community Plan contains Chapter V, Urban Design, which states that improvement to lack of functional and aesthetic integration can be achieved if new development is guided by the principles of the Community Plan's Urban Design chapter and through the Community Design Overlay Ordinance enacted by the City Council. The Community Plan includes community design and landscaping policies, which pertain to greenway improvement and landscaping in public spaces and rights-of-way. The design policies for individual projects includes policies for individual multiple-residential, commercial, and industrial projects (City of Los Angeles, 2016, p. V-1).

4.1.2.2 Existing Conditions

Project Site Characteristics

The Project Site is located in the community of El Sereno, in the northeastern part of City of Los Angeles, which is characterized by hilly topography and dense urban development. Dominant natural visual resources in the Project vicinity comprise scenic vistas of numerous hillsides in the Project area, natural open spaces and park lands including the Ernest Debs Regional Park and Rose Hill Park to the north and Rose Hill Recreation Center to the south.

Due to hilly topography, scenic views incorporating the Project Site are available from public thoroughfares and open spaces in the vicinity of the Project. In general, public views include scenic views and vistas of nearby and distant hillsides incorporating the built environment and natural open spaces in the surrounding area. Private views in the Project vicinity (i.e., views from surrounding developments), are similar to public views, but are more restricted by landscaping, numerous trees and existing structures.

As discussed in **Section 4.4**, Cultural Resources, the existing buildings are designed in the modern style typical of public housing complexes of the period, generally with low-pitched side gable roofs with slightly overhanging eaves and exposed rafter tails. The roofs were originally covered with tar and gravel, but are now covered with a rolled composition material. Exterior walls are sheathed with stucco. Front and rear entrances are typically situated in pairs and feature a shared concrete stoop sheltered by a non-original flared mansard hood; originally the hoods were flat. The doors have been replaced throughout and metal security doors have been installed. The stoops are surrounded by simple metal railings. The fenestration consists of original steel multi-paned casement windows throughout all of the buildings, except one which has had windows replaced. Window openings are generally stacked vertically.

Past alterations to the property include the replacement of the hoods above the entrances, the replacement of the windows in one apartment building on the south block, and the construction of a handicap access ramp on the administration building. Further alterations that have taken place include the replacement of doors on the front and rear elevations of the administration building. Originally, these doors were partially-glazed and presumably wood; they were replaced with metal slab doors at an unknown date for security reasons. A portion of the original maintenance yard was enclosed for a building addition at the southwest corner at an unknown date. The original wood paneled doors in the apartment buildings have been replaced with metal slab doors and metal security doors were installed as well. A detailed history and description of Rose Hill Courts is included in the Historical Resource Technical Report prepared by GPA Consulting, 2019 (**Appendix L)**.

Refer to **Figure 4.1-1a** below which is a photographic key map for the photos of the Project Site and surrounding areas depicted in **Figure 4.1-1b** through **Figure 4.1-1f**. These photographs show the

existing conditions both on the Project Site as well as in the Project area. As shown in these photographs, the surrounding Project area is a mix of residential, open space/recreational, and educational land uses. Refer to **Table 4.1-1** below, which describes the existing visual character and land uses in the Project area.

Figure 4.1-1a
PHOTOGRAPHIC KEY MAP

Figure 4.1-1b
VISUAL CHARACTER OF PROJECT AREA

PHOTO 1: View from existing homes above Florizel Street looking towards the area located east of the project site, where Our Lady of Guadalupe Catholic School is located.

PHOTO 2: View from vacant lot north of Browne Avenue, looking towards Our Lady of Guadalupe Catholic School.

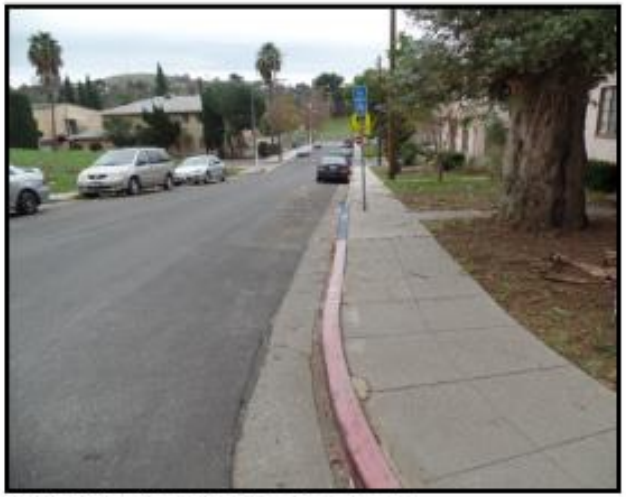


PHOTO 3: View from Florizel Street looking south.

PHOTO 4: View of from eastern side of the project site looking northeast towards Our Lady of Guadalupe Catholic School parking lot.

Figure 4.1-1c
VISUAL CHARACTER OF PROJECT AREA

PHOTO 5: View of the Rose hill Recreation Center located southeast of the project site.

PHOTO 6: Rose Hill sign located at the intersection of Mercury Avenue and McKenzie Avenue.

PHOTO 7: View of the Rose Hill Court two-story buildings located on Mercury Avenue, looking north.

PHOTO 8: Rose Hill Courts two-story buildings located on Mercury Avenue looking northeast.

Figure 4.1-1d
VISUAL CHARACTER OF PROJECT AREA

PHOTO 9: View of existing homes along Mercury Avenue located south of the project site.

PHOTO 10: View looking toward the project site at the corner Boundary Avenue and Mercury Avenue.

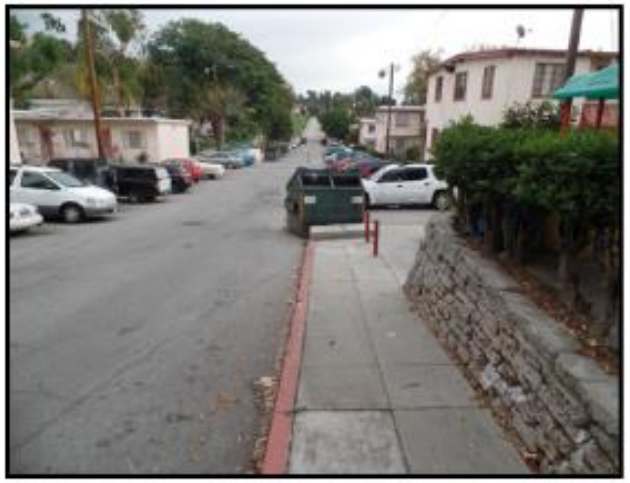


PHOTO 11: View from within the project site facing east.

PHOTO 12: View from within the project site facing west.

Figure 4.1-1e
VISUAL CHARACTER OF PROJECT AREA

PHOTO 13: View from within the project site on Victorine Street facing east.

PHOTO 14: View of existing playground within the project site facing south.

PHOTO 15: View of the playground at Rose Hill Park, located north of the project site.

PHOTO 16: Rose Hill Court administrative building on Florizel Street.

Figure 4.1-1f
VISUAL CHARACTER OF PROJECT AREA

PHOTO 17: View of the project site from Florizel Street facing south.

PHOTO 18: View from Florizel Street facing east with the project site on the right.

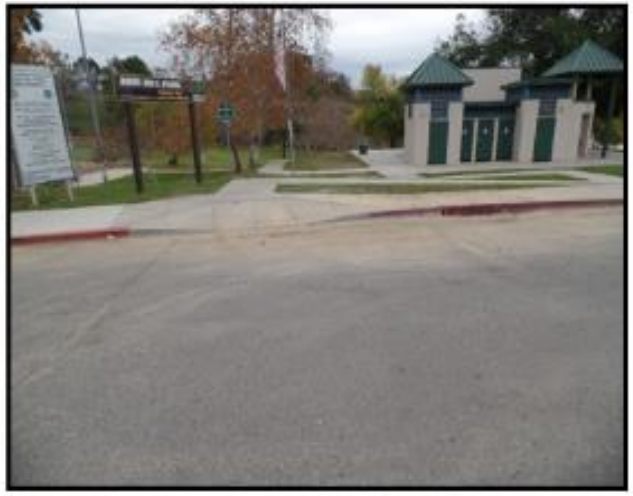


PHOTO 19: View of Rose Hill Park north of the project site.

PHOTO 20: View of the baseball field in Rose Hill Park, north of the project site.

Table 4.1-1
EXISTING VISUAL CHARACTER AND LAND USES IN THE PROJECT AREA

Location	Land Use Designation[1]	General Characteristics[2]	Existing Lighting[2]	Building Materials and colors[2]	Building Design	Landscaping
North of the Project Site	Low Single Family Residential	Rose Hill Park	Lighting for the baseball field for Rose Hill Park. Street lighting along Florizel Street.	White cement and brick building with blue and green roof.	A one-story bathroom facility for Rose Hill Park.	Large grass area and trees.
South of the Project Site	Low Single Family Residential	Single-family residential. Overhead utility lines and sidewalks along both sides of Mercury Avenue.	Lights from residences. Street lights along Mercury Avenue.	Wood, brick, stucco: homes with white trim and grey roofs; tan and brown homes, white home with tan roof/ red brick.	One-story and two-story single-family residences. No distinct architectural style.	Trees, grasses, and shrubs.
East of the Project Site	Open Space Low Single Family Residential	Our Lady of Guadalupe Catholic Church/Elementary School. Additionally, there is an empty lot located north of Browne Avenue.	Lights from building and parking lot lighting across McKenzie Avenue from the Project Site.	Wood, windows, brick, stucco: grey roofs on tan buildings, and white church with black trim and grey roof.	One-story and two-story church/elementary school buildings. No distinct architectural style.	Trees and shrubs.
West of the Project Site	Open Space	The Ernest E. Debs Regional Park Native American Terraced Garden.	Street lighting along Boundary Avenue.	Not Applicable	Not Applicable	A terraced garden with trees and vegetation.
Project Site	Low Single Family Residential	15 buildings, comprised of 14 residential buildings with 100-multi-family units, and one administration building.	Lights from onsite residences, pole mounted lights along Florizel Street, Boundary Avenue, Mercury Avenue and McKenzie Avenue.	Wood frame construction, concrete slab foundations, and composition roofing.	Residential buildings are two stories tall. The administration building is one story tall.	Grass, trees, and shrubs.

Source: UltraSystems, 2018
[1]City of Los Angeles General Plan Land Use Map.
[2] Google Earth Pro, 2018 and site visit to Rose Hill Courts in July 2018 by UltraSystems staff.

4.1.3 Project Impacts

4.1.3.1 Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, the Project would have a significant impact related to aesthetics if it would:

Threshold (a): ***Have a substantial adverse effect on a scenic vista; or***

Threshold (b): ***Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway; or***

Threshold (c): ***In nonurbanized 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; or***

Threshold (d): ***Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.***

4.1.3.2 Methodology

A "visual environment" includes the built environment (development patterns, buildings, parking areas, and circulation elements) and natural environment (such as hills, vegetation, rock outcroppings, drainage pathways, and soils) features. Visual quality, viewer groups and sensitivity, duration, and visual resources characterize views. Visual quality refers to the general aesthetic quality of a view, such as vividness, intactness, and unity. Viewer groups identify who is most likely to experience the view. High-sensitivity land uses include residences, schools, playgrounds, religious institutions, and passive outdoor spaces such as parks, playgrounds, and recreation areas. Duration of a view is the amount of time that a particular view can be seen by a specific viewer group. Visual resources refer to unique views, and views identified in local plans, from scenic highways, or of specific unique structures or landscape features. Scenic vistas generally include extensive panoramic views of natural features, unusual terrain, or unique urban or historic features, for which the field of view can be wide and extend into the distance, and focal views that focus on a particular object, scene or feature of interest.

For the purpose of analysis of impacts on aesthetics provided in this section, UltraSystems staff conducted a photographic inventory to document existing visual quality of the site and its surroundings. The existing conditions related to aesthetics are discussed in **Section 4.1.2.2** above. Proposed Project features were analyzed for their visual compatibility (in terms of land use and overall architectural design) with existing visual character of the surrounding developments in the Project area. An analysis of the shade and shadows cast by the proposed Project on surrounding shadow sensitive uses was also conducted.

The Project would demolish the existing Rose Hill Courts Project and provide 185 new housing units in place of the existing over 75-year-old housing complex. With the exception of some potential work in the street right-of-way for utilities, the Project would remain within the boundaries of the Project Site.

4.1.3.3 Analysis of Project Impacts

Threshold (a): Would the Project have a substantial adverse effect on a scenic vista?

As discussed in the Initial Study prepared for the Project, included as **Appendix B** of this Draft EIR, there are no scenic views or vistas afforded on or through the Project Site and thus development of the proposed Project would not result in impacts to scenic vistas or views. Distant views of hills to the southeast from McKenzie Avenue and Florizel Street would remain. **Therefore, the Project would have no impact with respect to Threshold (a) and no mitigation is required.**

Threshold (b): Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Rose Hill Courts originated as a public housing complex developed by HACLA in 1942. The complex was formally determined eligible for listing in the National Register of Historic Places (NRHP) as a historic district in 2003 through the federal review process under Section 106 of the National Historic Preservation Act. As such, it was automatically listed in the California Register of Historical Resources (CRHR). Properties that are listed in the CRHR are defined by CEQA as historic resources. The history of Rose Hill Courts is discussed in further detail in **Section 3.0**, Environmental Setting, and **Section 4.4**, Cultural Resources. Since the existing Rose Hill Courts complex is listed in the CRHR because the buildings are historic, the historic building complex is therefore considered to be a scenic resource.

As discussed in the Initial Study prepared for the Project, included as **Appendix B** of this Draft EIR, the Project Site is not located along or within a state scenic highway. The closest officially designated scenic highway is State Route 110 (Arroyo Seco Historic Parkway) located approximately one mile to the east of the Project Site. Furthermore, the Project Site is surrounded by steep hills to the east and the northeast, which obstruct views to and from the Arroyo Seco Scenic Parkway. As such, the existing historic buildings on the site are not considered a scenic resource within a state scenic highway. The Project would be consistent with the City's General Plan (2035) and Zoning Ordinances which impose development guidelines and standards to preserve scenic resources and reduce the obstruction of public views from locally designated scenic highways. Therefore, no impact would occur to scenic resources specifically within a state scenic highway and no mitigation would be required for impacts to scenic resources within a state scenic highway.

However, although the Project Site is not located within a state scenic highway, it is considered a scenic resource since the buildings are historic. The proposed demolition of the existing buildings would substantially damage a scenic resource, which would be considered a significant adverse impact. Mitigation measures **CUL-1** and **CUL-2** would be implemented to comply with CEQA regarding historic cultural resources. However, as discussed in Section 4.4, Cultural Resources (specifically Section 4.4.4, Analysis of Project Impacts) in this DEIR, in most circumstances, the demolition of a historic resource cannot be mitigated to a less than significant level. **Therefore, impacts, after implementation of mitigation measures, to aesthetics with regards to the historic buildings (and thus a scenic resource) would remain significant and unavoidable.**

Threshold (c): ***In nonurbanized areas, would the Project 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?***

The Project Site is located in an urban setting characterized by a mix of single family and multi-family residential buildings, low-scale commercial, recreational, civic/institutional buildings, natural open spaces and park lands. Views of the existing streetscape are characterized by low height (one or two-story) buildings, aging infrastructure and scenic views and vistas of nearby and distant hillsides and natural open spaces in the surrounding area.

As discussed in Section 2.0, Project Description, of this Draft EIR, the Project Site is located in the Northeast Los Angeles Community Plan (Community Plan) area and has a designated land use of low density residential (which corresponds to RE9, RS, R1, RU, RD6, RD5 zones). The Project Site is zoned by the Los Angeles Municipal Code as [Q]R1-1D (One Family Dwelling, Height District 1D). The One Family Zone permits one- and two-family dwellings, parks, playgrounds and community centers. Therefore, the Rose Hill Courts development is an existing "non-conforming" use because the existing development has multi-family housing units which were constructed before the site's zoning was downzoned to R1 in the year 2000. The project is requesting deviations under the LAMC §14.00B including a density bonus in excess of that permitted in LAMC §12.22 A.25 as well as increasing the maximum height limitation from 30 feet (required by Ordinance 180,403, and the associated "D" Limitation A1.a) to 56 feet and changing the front yard setback from 20 feet (required by the R1 zone) to a range of 14-20 feet.

The Project is also requesting an Affordable Housing Density Bonus as identified in LAMC §12.22 A.25 and filed per LAMC §11.5.7. The request is to allow a Density Bonus project with off-menu incentives. As discussed in Section 2.0, the Project includes a total of seven (a through g) requested off-menu incentives. Five of those (a through e) would affect aesthetics or scenic quality. These include:

h. To Allow an affordable housing project to calculate its buildable area based on the "Buildable Area" definition in LAMC §12.03 rather than the "Floor Area, Residential" and "Base Floor" definitions referenced in Ordinance 180,403, and "Q" Condition 2.d. (1), and LAMC §12.03.
i. To Allow an affordable housing project to deviate from the "step-back" provisions of Ordinance 180,403, and "Q" Condition 2.d. (2). This deviation shall additionally require no limitation on the percentage of exterior walls facing a front lot line.
j. To Allow an affordable housing project to consist of one (1) building type and roof form in lieu of the three (3) or more identified in Ordinance 180,403, and "Q" Condition 2.d. (3).
k. To Allow new hardscape areas to utilize both permeable and impermeable paving systems in lieu of the language requiring projects to utilize only permeable paving systems identified in Ordinance 180,403, and "Q" Condition 2.f. and "Q" Condition 5.e.
l. To Allow the construction of retaining walls that exceed the total quantity and linear footage identified in Ordinance 180,403, and "Q" Condition 3.a.

Details regarding the Project design are discussed in Section 2.0 of this Draft EIR. Based on extensive outreach to the existing residents on the site and in the community, the Project has been designed to provide high quality, multi-family housing, at a scale that is contextual and appropriate for the site and the community. The architectural plan is based on creating a development with multiple building

and unit types with shared amenities. Refer to **Figures 4.1-3** through **4.1-7**, which show the preliminary conceptual renderings for the Project. As shown in these figures, the Project proposes a variety of building materials (including stucco, and composite siding) that would conform to current regulations.

Additionally, the Project proposes buildings that would range from one story in height to four stories, with a maximum height of 56 feet. Buildings A & B would be four-story buildings and would be no more than 56 feet above the proposed grade. Buildings C & D would be three-story buildings as viewed from the street and would be no more than 46 feet above the proposed grade when viewed from lowest point. Buildings E & F would be three-story buildings and would be no more than 40 feet above the proposed grade; and Buildings G andH would be two-story buildings and would be no more than 30 feet above the proposed grade. Building I would be a two-story building and would be no more than 36 feet above the proposed grade. Building J is the proposed Management Office/Community Building and it would only be a one-story building, no more than 25 feet above the proposed grade.

Consistency with Applicable Plans and Policies

The Project would not conflict with regulations governing scenic quality. The Urban Form and Neighborhood Design Chapter of the Framework Element's intent is to build on each neighborhood's attributes, emphasize livability for existing and future residents, and reinforce the connectivity of the neighborhoods to a citywide structure (City of Los Angeles Department of City Planning, 2018a). The Project's consistency with applicable General Plan and Community Plan Urban Design policies and the City's Walkability Checklist policies is analyzed in **Section 4.8** of this document. The Project has been designed to be compatible with the existing development in the Project vicinity. The Project would be consistent with goals, objectives and policies contained in existing planning documents that regulate urban design and development in the Project area. The proposed redevelopment would improve the visual quality and aesthetics in addition to the use of the site.

Compared to existing conditions, there would be fewer buildings on the Project Site, however some of those buildings would be up to three and four stories in height. In addition to the more modern looking four-story buildings, the Project also proposes two- and three-story buildings with a cottage look. The existing over 75-year-old structures onsite would be replaced with new buildings. The Project would construct new dwelling units with new building materials and landscaping throughout. The Project has been designed to provide up to 185 dwelling units onsite and the new development would provide better quality housing conditions within a well-designed and attractively landscaped housing complex compared to the existing over 75-year-old Rose Hill Courts housing development currently located on the Project Site. **Therefore, the Project would not conflict with applicable zoning and other regulations governing scenic quality and impacts would be less than significant regarding Threshold (c).**

Threshold (d): Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Shade and Shadows

For the purposes of analyzing shade/shadow impacts, a significant impact would occur when shadow-sensitive uses (such as residential structures, schools, churches, parks, etc.) would be shaded by a proposed Project building. Refer to **Figure 4.1-2**, which shows the shadow exhibit prepared by the Project architect for the Project. As depicted in **Figure 4.1-2**, shadows produced by the Project

would not impact adjacent land uses because the furthest extent of shadows offsite (on December 21st at 3:00 PM) would not fall on any buildings located east of the Project Site. Shadows would fall onto the sidewalk located on the eastern side of McKenzie Avenue and would not impact the building located at the southeast corner of McKenzie Avenue and Browne Avenue. **Therefore, the Project would have a less than significant impact regarding generation of shade and shadow on adjacent land uses and structures.**

Light and Glare

As discussed in the Initial Study prepared for the Project, included as **Appendix B** of this Draft EIR, artificial lighting is currently utilized onsite and in the surrounding area for security, parking, signage, architectural highlighting, and landscaping/decorative purposes. The lights currently on the Project Site are not energy efficient and comprised of older lighting. The Project proposes new lighting that is energy efficient and that would shield light from spilling offsite. Glare could be produced from glass windows, and from parked cars, however the Project would not result in significant glare impacts because it does not propose highly reflective building materials **with respect to Threshold (d)**. Furthermore, the Project would be required to comply with the City of Los Angeles Municipal Code lighting requirements (Chapter 1 [Article 2, § 12.21-A,5(k), Article 7, § 17.08-C, and Article 4.4, § 14.4.4(E)] and Chapter 9, Article 3, § 93.0117(b)). as discussed in Section 4.1.2. **Therefore, the Project would have a less than significant impact related to lighting and glare.**

4.1.4 Cumulative Impacts

As discussed in **Section 3.0** of this Draft EIR, there are seven related projects that were considered in the cumulative analysis for the proposed Project. The related projects generally consist of infill development including apartments, single family homes, mixed use, retail, office and school uses (KOA, 2019, Attachment F). Similar to the proposed Project, the cumulative projects would be required to comply with relevant policies and regulations related to aesthetics and would be subject to CEQA review. As discussed in Section 4.4, Cultural Resources, although there are no known related projects involving historical resources within a similar context or property type as Rose Hill Courts, it is reasonably foreseeable that HACLA could redevelop, partially redevelop, or significantly rehabilitate other public housing complexes in the future. If those public housing projects were historical resources, the project could potentially contribute to cumulative impacts on historical resources (GPA Consulting, 2018, p. 1). Since historical buildings are considered scenic aesthetic resources, the proposed Project, when considered with other potential projects, would have a significant cumulative impact on historical resources. **Therefore, implementation of the proposed Project along with the cumulative projects considered for the purpose of this analysis would have cumulatively significant aesthetic impacts regarding historical resources.**

4.1.5 Mitigation Measures

As discussed above, the historic buildings onsite would be demolished and replaced with new buildings. Although the existing buildings are in poor condition, they are listed as historic on the CRHR and therefore considered to be scenic aesthetic resources**.**

As discussed in **Section 4.4.6.1,** Mitigation Measures**,** Historic Architectural Resources, HACLA will implement mitigation measures **CUL-1** and **CUL-2** to comply with CEQA regarding historic cultural resources. **However, the mitigation measures would not reduce potentially significant impacts on built environment resources to a less than significant level. Therefore, impacts after**

implementation of mitigation measures to aesthetics with regards to the historic buildings would remain significant and unavoidable.

4.1.6 Level of Significance After Mitigation

Significant impacts related to aesthetics (with regards to historical resources) would occur as a result of the proposed Project. The Project would not be consistent with applicable General Plan Urban Design policies regarding historic resources. After implementation of mitigation measures **CUL-1** and **CUL-2**, impacts on historical resources and thus impacts on aesthetic resources would remain significant and unavoidable. Cumulative impacts associated with aesthetics with regards to historical resources would be cumulatively significant and unavoidable.

Figure 4.1-2
PROPOSED PROJECT SHADOW ANALYSIS

Disclaimer: Illustration provided by Withee Malcolm Architects, who has indicated that the information is true and correct. No other warranties are expressed or implied

Source: Withee Malcolm Architects, March 2019

UltraSystems
environmental•management•planning

Rose Hill Courts Redevelopment

Shadow Analysis

Figure 4.1-3
PRELIMINARY CONCEPTUAL RENDERING FOR BUILDING A

Figure 4.1-4
PRELIMINARY CONCEPTUAL RENDERING FOR BUILDING B

Figure 4.1-5
PRELIMINARY CONCEPTUAL PROJECT RENDERING FOR BUILDINGS C & D

Figure 4.1-6
PRELIMINARY CONCEPTUAL PROJECT RENDERING FOR BUILDINGS G, H & I

Figure 4.1-7
PRELIMINARY CONCEPTUAL PROJECT RENDERING FOR BUILDING J

4.2 Air Quality

4.2.1 Introduction

This section addresses the Project's impacts on regional and local air quality. After discussing the factors that influence air quality in the South Coast Air Basin (SCAB or Basin), it identifies air pollutants of concern and summarizes their health effects. The section identifies and describes relevant federal, state, regional and municipal air quality regulations, standards, policies, and plans; characterizes ambient air quality near the Project Site, and defines criteria for significance of impacts. Emissions are estimated for both construction and project operations and compared with significance thresholds. Inputs to and outputs from CalEEMod, the emissions model used for this analysis, are provided in **Appendix G**.

4.2.2 Environmental Setting

4.2.2.1 Air Quality Background

Air quality is affected by both the rate and location of pollutant emissions, and by meteorological conditions that influence movement and dispersal of pollutants. Atmospheric conditions such as wind speed, wind direction, and air temperature gradients, along with local topography, provide the link between air pollutant emissions and air quality.

The Project Site is in the City of Los Angeles, which is in the SCAB. The Basin includes all of Orange County and the non-desert portions of Los Angeles County, most of Riverside County, and the western portion of San Bernardino County—including some portions of what was previously known as the Southeast Desert Air Basin. The distinctive climate of the Basin is determined by its terrain and geographic location. The Basin is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the southwest and high mountains around its remaining perimeter. The general region lies in the semi-permanent high-pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average wind speeds. The usually mild climatological pattern is interrupted occasionally by periods of extremely hot weather, winter storms, or Santa Ana winds.

The vertical dispersion of air pollutants in the Basin is hampered by the presence of persistent temperature inversions. An upper layer of dry air that warms as it descends characterizes high-pressure systems, such as the semi-permanent high-pressure zone in which the Basin is located. This upper layer restricts the mobility of cooler marine-influenced air near the ground surface and results in the formation of subsidence inversions. Such inversions restrict the vertical dispersion of air pollutants released into the marine layer and, together with strong sunlight, can produce worst-case conditions for the formation of photochemical smog.

The atmospheric pollution potential of an area is largely dependent on winds, atmospheric stability, solar radiation, and terrain. The combination of low wind speeds and low inversions produces the greatest concentration of air pollutants. On days without inversions, or on days of winds averaging over 15 miles per hour (mph), smog potential is greatly reduced (SCAQMD, 1993).

The nearest National Weather Service station to the Project Site is in Pasadena, approximately 5.13 miles northeast of the Project Site, at 34.148°N, 118.14°W. At the Pasadena station (WRCC, 2018), the National Climatic Data Center period of record is 1893 through 2016. During the period of record, the average annual rainfall measured 20.24 inches, which occurs mostly during the

winter and relatively infrequently during the summer. Monthly precipitation averages approximately 4.02 inches during the winter (December, January, and February), approximately 1.74 inches during the spring (March, April, and May), approximately 0.91 inch during the fall (September, October, and November), and approximately 0.08 inch during the summer (June, July, and August).

The average maximum and minimum monthly temperatures during the period of record were 76.8 and 51.0 degrees Fahrenheit (°F), respectively. Average winter (December, January, and February) high and low temperatures are approximately 67.2°F and 43.3°F, respectively and average summer (June, July, and August) high and low temperatures are approximately 86.4°F and 58.6°F, respectively (WRCC, 2018).

Winds in the Basin are generally light, tempered by afternoon sea breezes. Severe weather is uncommon in the Basin, but strong easterly winds known as the Santa Ana winds can reach 25 to 35 mph below the passes and canyons. During the spring and summer months, air pollution is carried out of the region through mountain passes in wind currents or is lifted by the warm vertical currents produced by the heating of the mountain slopes. From the late summer through the winter months, because of the average lower wind speeds and temperatures in the proposed Project area and its vicinity, air contaminants do not readily disperse, thus trapping air pollution in the area.

4.2.2.2 Air Pollution and Potential Health Effects

Short- and/or long-term exposure to air pollution has been associated with a wide range of human health effects, including increased respiratory symptoms, hospitalization for heart or lung diseases, and even premature death (USEPA, 2018a). Hazardous (or toxic) air pollutants may cause cancer or other serious health effects, such as reproductive effects or birth defects. Specific groups within the general population may have a greater risk of pollution effects due to a variety of factors. For example, children often are more vulnerable to pollutants. The following are summaries of the health effects of the air pollutants typically emitted during construction and operation of multi-family housing developments.

Criteria pollutants are air pollutants for which acceptable levels of exposure can be determined and an ambient air quality standard (AAQS) has been established by the U.S. Environmental Protection Agency (USEPA) and/or the California Air Resources Board (ARB). The criteria air pollutants of concern are nitrogen dioxide (NO_2), carbon monoxide (CO), particulate matter (PM), sulfur dioxide (SO_2), lead, and ozone, and their precursors. Since the proposed Project would not generate appreciable SO_2 or lead emissions,[6] it is not necessary for the analysis to include those two pollutants. Federal and state AAQS are listed in **Table 4.2-1**. Presented below is a description of the air pollutants of concern and their known health effects.

6 Sulfur dioxide emissions will be about 0.045 pound per day during construction and about 0.006 pound per day during operations.

Table 4.2-1
AMBIENT AIR QUALITY STANDARDS FOR CRITERIA AIR POLLUTANTS

Pollutant	Averaging Time	California Standards[1]		National Standards[2]		
		Concentration[3]	Method[4]	Primary[3,5]	Secondary[3,6]	Method[7]
Ozone (03)[8]	1 Hour	0.09 ppm (180 μg/m³)	Ultraviolet Photometry	---	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 μg/m³)		0.070 ppm (137 μg/m³)		
Respirable Particulate Matter (PM_{10})[9]	24 Hour	50 μg/m³	Gravimetric or Beta Attenuation	150 μg/m³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 μg/m³		---		
Fine Particulate Matter ($PM_{2.5}$)[9]	24 Hour	No Separate State Standard		35 μg/m³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 μg/m³	Gravimetric or Beta Attenuation	12 μg/m³	15 μg/m³	
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m³)	Non-Dispersive Infrared Photometry (NDIR)	35 ppm (40 mg/m³)	---	Non-Dispersive Infrared Photometry (NDIR)
	8 Hour	9.0 ppm (10 mg/m³)		9 ppm (10 mg/m³)		
Nitrogen Dioxide (NO_2)[10]	1 Hour	0.18 ppm (339 μg/m³)	Gas Phase Chemiluminescence	100 ppm (188 μg/m³)	---	Gas Phase Chemiluminescence
	Annual Arithmetic Mean	0.030 ppm (57 μg/m³)		0.053 ppm (100 μg/m³)	Same as Primary Standard	
Sulfur Dioxide (SO_2)[11]	1 Hour	0.25 ppm (655 μg/m³)	Ultraviolet Fluorescence	75 ppm (196 μg/m³)	---	Ultraviolet Fluorescence; Spectrophotometry (Pararosaniline Method)
	3 Hour	---		---	0.5 ppm (1300 μg/m³)	
	24 Hour	0.04 ppm (105 μg/m³)		0.14 ppm (for certain areas)[11]	---	
	Annual Arithmetic Mean	---		0.030 ppm (for certain areas)[11]	---	
Lead[12,13]	30 Day Average	1.5 μg/m3	Atomic Absorption	---	---	---
	Calendar Quarter	---		1.5 μg/m³ (for certain areas)[12]	Same as Primary Standard	High Volume Sampler and Atomic Absorption
	Rolling 3-Month Average	---		0.15 μg/m³		
Visibility Reducing						
Visibility Reducing Particles[14]	8 Hour	See footnote 14	Beta Attenuation and Transmittance through Filter Tape	**No National Standards**		
Sulfates	24 Hour	25 μg/m³	Ion Chromatography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 μg/m³)	Ultraviolet Fluorescence			
Vinyl Chloride[12]	24 Hour	0.01 ppm (26 μg/m³)	Gas Chromatography			

1. California Standards for ozone, carbon monoxide, sulfur dioxide (1 and 24 hour), nitrogen dioxide, suspended particulate matter–PM_{10}, $PM_{2.5}$, and visibility reduction particles, are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in § 70200 of Title 17 of the California Code of Regulations.
2. National Standards (other than ozone, particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration in a year, averaged over 3 years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar with a 24-hour average concentration above 150 μg/m³ is equal to or less than one. For $PM_{2.5}$, the 24-hour standard is attained when 98% of the daily concentrations, averaged over 3 years, are equal to or less than the standard.
3. Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

Pollutant	Averaging Time	California Standards[1]		National Standards[2]		
		Concentration[3]	Method[4]	Primary[3,5]	Secondary[3,6]	Method[7]

4. Any equivalent procedure which can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.
5. National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
6. National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
7. Reference method as described by the EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by EPA.
8. On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.
9. As of December 14, 2012, the annual primary $PM_{2.5}$ standard changed from 15 μg/m^3 to 12 μg/m^3. The existing national 24-hour $PM_{2.5}$ standards (primary and secondary) were retained at 35 μg/m^3, as was the annual secondary standard of 15 μg/m^3. The existing 24-hour PM_{10} standards (primary and secondary) of 150 μg/m^3 also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
10. To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.
11. On June 2, 2010, a new 1-hour SO_2 standard was established, and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

    * Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.
12. The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
13. The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 μg/m^3 as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.
14. In 1989, the ARB converted the general statewide 10-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer".

Criteria Pollutants

Ozone (O_3)

Ozone is a secondary pollutant produced through a series of photochemical reactions involving ROG and NOX. Ozone creation requires ROG and NOX to be available for approximately three hours in a stable atmosphere with strong sunlight. Because of the long reaction time, peak ozone concentrations frequently occur downwind of the sites where the precursor pollutants are emitted. Thus, ozone is considered a regional, rather than a local, pollutant.

Individuals working outdoors, children (including teenagers), older adults, people with preexisting lung disease, such as asthma, and individuals with certain nutritional deficiencies are considered to be the subgroups most susceptible to ozone effects. Short-term exposures (lasting for a few hours) to ozone at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes. Elevated ozone levels are associated with increased school absences and daily hospital admission rates, as well as increased mortality. An increased risk for asthma has been found in children who participate in multiple sports and live in high-ozone communities. Ozone exposure under exercising conditions is known to increase the severity of respiratory symptoms. Although lung volume and airway resistance changes observed after a single exposure diminish with repeated exposures, biochemical and cellular changes appear to persist, which can lead to subsequent lung structural changes (SCAQMD, 2017, p. 2-17).

Particulate Matter (PM_{10} and $PM_{2.5}$)

PM is a general term used to describe a complex group of airborne solid, liquid, or semi-volatile materials of various sizes and composition. Primary PM is emitted directly into the atmosphere from activities such as agricultural operations, industrial processes, construction and demolition activities, and entrainment of road dust into the air. Secondary PM is formed in the atmosphere from predominantly gaseous combustion by-product precursors, such as sulfur oxides, NO_X, and ROGs.

Particle size is a critical characteristic of PM that primarily determines the location of PM deposition along the respiratory system (and associated health effects) as well as the degradation of visibility through light scattering. In the United States, federal and state agencies have established two types of PM air quality standards, as shown in **Table 4.2-1.** PM_{10} corresponds to the fraction of PM no greater than 10 micrometers in aerodynamic diameter and is commonly called respirable PM, while $PM_{2.5}$ refers to the subset of PM_{10} of aerodynamic diameter smaller than 2.5 micrometers, and is commonly called fine PM.

PM_{10} and $PM_{2.5}$ deposition in the lungs results in irritation that triggers a range of inflammation responses, such as mucus secretion and bronchoconstriction, and exacerbates pulmonary dysfunctions, such as asthma, emphysema, and chronic bronchitis. Sufficiently small particles may penetrate the bloodstream and impact functions such as blood coagulation, cardiac autonomic control, and mobilization of inflammatory cells from the bone marrow. Individuals susceptible to higher health risks from exposure to PM_{10} airborne pollution include children, the elderly, smokers, and people of all ages with low pulmonary/cardiovascular function. For these individuals, adverse health effects of PM_{10} pollution include coughing, wheezing, shortness of breath, phlegm, bronchitis, and aggravation of lung or heart disease, leading for example to increased risks of hospitalization and mortality from asthma attacks and heart attacks.

In the 2020 ARB projected emission inventory (EI) (ARB, 2018a), the primary sources of PM_{10} are in the category labeled Miscellaneous Processes, with 59% of the total PM_{10}, primarily from paved road dust and construction and demolition activity. Since $PM_{2.5}$ is finer and results more from combustion processes, the primary sources of $PM_{2.5}$ are still from the Miscellaneous Processes category but come mostly from managed burning and disposal (33%), paved road dust (26%), and residential fuel combustion (17%).

***Carbon Monoxide* (CO)**

CO is a colorless and odorless gas formed by the incomplete combustion of fossil fuels. CO is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. In urban areas, such as the project location, automobile exhaust accounts for most CO emissions. CO is a non-reactive air pollutant that dissipates relatively quickly; therefore, ambient CO concentrations generally follow the spatial and temporal distributions of vehicular traffic. CO concentrations are influenced by local meteorological conditions; primarily wind speed, topography, and atmospheric stability. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, a typical situation at dusk in urban areas between November and February. The highest levels of CO typically occur during the colder months of the year when inversion conditions are more frequent.

Individuals with a deficient blood supply to the heart are the most susceptible to the adverse effects of CO exposure. (SCAQMD, 2017, p. 2-38) The effects observed include earlier onset of chest pain with exercise, and electrocardiograph changes indicative of worsening oxygen supply delivery to the heart. Inhaled CO has no known direct toxic effect on the lungs but exerts its effect on tissues by interfering with oxygen transport, by competing with oxygen to combine with hemoglobin present in the blood to form carboxyhemoglobin (COHb). Hence, people with conditions requiring an increased oxygen supply can be adversely affected by exposure to CO. Individuals most at risk include patients with diseases involving heart and blood vessels, fetuses, and patients with chronic hypoxemia (oxygen deficiency), such as is seen at high altitudes.

Reductions in birth weight and impaired neurobehavioral development have been observed in animals chronically exposed to CO resulting in COHb levels similar to those observed in smokers. Recent studies have found increased risks for adverse birth outcomes with exposure to elevated CO levels, including preterm births and heart abnormalities.

Per the 2020 projected EI, 43% of the total CO in the Los Angeles County portion of the Basin comes from onroad motor vehicles, primarily light-duty autos and trucks. Other offroad engines and vehicles (primarily construction equipment) will contribute another 49%.

***Nitrogen Dioxide* (NO_2)**

Nitrogen oxides (NO_X) serve as integral participants in the process of photochemical smog production. The two major forms of NO_X are nitric oxide (NO) and NO_2. NO is a colorless, odorless gas formed from atmospheric nitrogen and oxygen when combustion takes place under high temperature and/or high pressure. NO_2 is a reddish-brown irritating gas formed by the combination of NO and oxygen. NO_X is an ozone precursor. A precursor is a directly emitted air contaminant that, when released into the atmosphere, forms, causes to be formed, or contributes to the formation of a secondary air contaminant for which an AAQS has been adopted, or whose presence in the atmosphere will contribute to the violation of one or more AAQS. When NO_X and reactive organic gases (ROG) are

released in the atmosphere, they can chemically react with one another in the presence of sunlight to form ozone.

Experimental studies have found that NO_2 exposures increase responsiveness of airways, pulmonary inflammation, and oxidative stress, and can lead to the development of allergic responses. (SCAQMD, 2017, p. 2-43). These biological responses provide evidence of a plausible mechanism for NO_2 to cause asthma. Additionally, results from controlled exposure studies of asthmatics demonstrate an increase in the tendency of airways to contract in response to a chemical stimulus (airway responsiveness) or after inhaled allergens. Animal studies also provide evidence that NO_2 exposures have negative effects on the immune system, and therefore increase the host's susceptibility to respiratory infections. Epidemiological studies showing associations between NO_2 levels and hospital admissions for respiratory infections support such a link, although the studies examining respiratory infections in children are less consistent.

A review of the projected 2020 EI shows that 45% of the total NO_X emissions in Los Angeles County portion of the Basin are projected to come from onroad vehicles, primarily from heavy-duty diesel trucks and from light-duty autos and trucks, and another 17% come from offroad vehicles, primarily from construction equipment, ocean-going vessels, and aircraft.

Volatile Organic Compounds (VOCs)

The term *reactive organic gases* (ROG) is used by the California ARB for this air quality analysis and is defined the same as the federal term "volatile organic compound" (VOC). ROGs are defined as any compound of carbon, excluding CO, carbon dioxide (CO_2), carbonic acid, metallic carbides or carbonates, and ammonium carbonate, which participate in atmospheric photochemical reactions. It should be noted that there are no state or national AAQS for ROG because ROGs are not classified as criteria pollutants. They are regulated, however, because a reduction in ROG emissions reduces certain chemical reactions that contribute to the formation of ozone. ROGs are also transformed in the atmosphere into organic aerosols, which contribute to higher PM_{10} and lower visibility.

According to the 2020 projected EI, over 29% of the total ROG in the Los Angeles County portion of the Basin in 2020 will be contributed by solvent evaporation, primarily from consumer products; another 25% will come from onroad vehicles, predominantly light-duty cars and trucks; and almost 19% will come from other mobile sources, such as recreational boats and offroad recreational vehicles.

Toxic Air Contaminants (TACs)

In addition to the above-listed criteria pollutants, toxic air contaminants (TACs) are another group of pollutants of concern. Assembly Bill (AB) 1807[7] sets forth a procedure for the identification and control of TACs in California. It defines a TAC as an air pollutant which may cause or contribute to an increase in mortality or an increase in serious illness, or which may pose a present or potential hazard to human health. Almost 200 compounds have been designated as TACs in California. The ten TACs posing the greatest known health risk in California, based primarily on ambient air quality data, are acetaldehyde, benzene, 1,3-butadiene, carbon tetrachloride, hexavalent chromium, formaldehyde, methylene chloride, para-dichlorobenzene, perchloroethylene, and diesel particulate matter (DPM).

7 Enacted in September 1983. Health and Safety Code § 39650 et seq., Food and Agriculture Code § 14021 et seq.

TACs do not have AAQS. Since no safe levels of TACs can be determined, there are no air quality standards for TACs. Instead, TAC impacts are evaluated by calculating the health risks associated with a given exposure. TAC concentrations in the SCAB and near the Project Site are discussed in **Section 4.2.2.4**.

4.2.2.3 Regulatory Framework

Criteria Pollutants

Federal

The Federal Clean Air Act (FCAA), passed in 1970, established the national air pollution control program. The basic elements of the FCAA are the NAAQS for criteria air pollutants, hazardous air pollutants standards, state attainment plans, motor vehicle emissions standards, stationary source emissions standards and permits, acid rain control measures, stratospheric ozone protection, and enforcement provisions.

The NAAQS are the maximum allowable concentrations of criteria pollutants, over specified averaging periods, to protect human health. The FCAA requires that the USEPA establish NAAQS and reassess, at least every five years, whether they are adequate to protect public health, based on current scientific evidence. The NAAQS are divided into primary and secondary standards; the former standards are set to protect human health within an adequate margin of safety, and the latter to protect environmental values, such as plant and animal life.

Data collected at permanent monitoring stations are used by the USEPA to classify regions as "attainment" or "nonattainment," depending on whether the regions have met the requirements stated in the primary NAAQS. Nonattainment areas are subject to additional restrictions, as required by the USEPA.

The FCAA Amendments in 1990 substantially revised the planning provisions for those areas not currently meeting NAAQS. The Amendments identify specific emission reduction goals that both require a demonstration of reasonable further progress and attainment and incorporate more stringent sanctions for failure to attain the NAAQS or to meet interim attainment milestones.

State

<u>California Clean Air Act (CCAA)</u>

The State of California began to set CAAQS in 1969 under the mandate of the Mulford-Carrell Act. There were no attainment deadlines for the CAAQS originally. However, the State Legislature passed the California Clean Air Act (CCAA) in 1988 to establish air quality goals, planning mechanisms, regulatory strategies, and standards of progress to promote their attainment. The ARB, which became part of the California Environmental Protection Agency (CalEPA) in 1991, is responsible for ensuring implementation of the CCAA, responding to the federal CAA, and for regulating emissions from motor vehicles and consumer products.

The CCAA requires attainment of CAAQS by the earliest practicable date. The state standards are generally more stringent than the corresponding federal standards. Attainment plans are required for air basins in violation of the State ozone, PM_{10}, CO, SO_2, or NO_2 standards. Responsibility for achieving state standards is placed on the ARB and local air pollution control districts. District plans

for nonattainment areas must be designed to achieve a 5% annual reduction in emissions. Preparation of and adherence to attainment plans are the responsibility of the local air pollution districts or air quality management districts.

California Code of Regulations

The California Code of Regulations (CCR) is the official compilation and publication of regulations adopted, amended or repealed by the state agencies pursuant to the Administrative Procedure Act (APA). The CCR includes regulations that pertain to air quality emissions. Specifically, Section 2485 in Title 13 of the CCR states that the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location. In addition, Section 93115 in Title 17 of the CCR states that operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.

Regional

South Coast Air Quality Management District

The South Coast Air Quality Management District (SCAQMD) is responsible for maintaining and improving air quality in all of Orange County and the urbanized portions of Los Angeles, Riverside and San Bernardino Counties. Through its regulations and rules, it implements state and federal laws and regulations within its geographic distribution.

The SCAQMD is required to produce plans to show how air quality will be improved in the region. The CCAA requires that these plans be updated triennially to incorporate the most recent available technical information.[8] A multi-level partnership of governmental agencies, at the federal, state, regional, and local levels, implements the programs contained in these plans. Agencies involved include the USEPA, the ARB, local governments, Southern California Association of Governments (SCAG), and the SCAQMD. The SCAQMD and the SCAG are responsible for formulating and implementing the Air Quality Management Plan (AQMP) for the Basin. The SCAQMD updates its AQMP every three years.

The 2016 AQMP was adopted by the SCAQMD Board on March 3, 2017, and was submitted to the ARB on March 10, 2017 to become part of the State Implementation Plan (SIP) (SCAQMD, 2017). The ARB adopted the 2016 AQMP, and the 2016 State SIP Strategy with its complementary commitments, on March 23, 2017 and submitted them to USEPA as revisions to the California SIP on April 27, 2017 (ARB, 2017a; ARB, 2018b). The 2016 AQMP focuses largely on reducing NO_X emissions as a means of attaining the 1979 1-hour ozone standard by 2022, the 1997 8-hour ozone standard by 2023, and the 2008 8-hour standard by 2031 (SCAQMD, 2017). The AQMP prescribes a variety of current and proposed new control measures, including a request to the USEPA for increased regulation of mobile source emissions. The NO_X control measures will also help the Basin attain the 24-hour standard for $PM_{2.5}$.

All projects are subject to SCAQMD rules and regulations in effect at the time of construction. Specific rules applicable to the construction of the project may include, but are not limited to, the following:

8 CCAA of 1988.

Rule 403 – Visible Emissions
This Rule prohibits discharge into the atmosphere from any single source of emission whatsoever of any air contaminant for a period or periods aggregating more than three minutes in any one hour which is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines.

Rule 403 – Nuisance
This Rule prohibits discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause injury or damage to business or property. The provisions of this rule do not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

Rule 403 – Fugitive Dust
This rule is intended to reduce the amount of PM entrained in the ambient air from anthropogenic (man-made) fugitive dust sources by requiring actions to prevent, reduce, or mitigate fugitive dust emissions. Rule 403 applies to any activity or man-made condition capable of generating fugitive dust. Some specific requirements of Rule 403 that apply to all construction projects, regardless of the size of their disturbed areas, are addressed below:[9]

- No person shall cause or allow emissions of fugitive dust to remain visible in the atmosphere beyond the property line of the emission source or to exceed 20% opacity if the dust emission is a result of a moving motorized vehicle.

- Apply applicable Best Available Control Measures in Table 1 of Rule 403 to minimize fugitive dust emissions during active operation.

- No person shall cause or allow PM_{10} levels to exceed 50 micrograms per cubic meter when determined as the difference between upwind and downwind samples collected on high-volume PM samplers or other USEPA approved equivalent method for PM_{10} monitoring at the project limits for a five-hour period during the time of Active Operations. Sampling will only occur if a complaint is reported to the SCAQMD, in which case the decision to conduct sampling will be made by SCAQMD, and SCAQMD will conduct sampling.

- No person shall allow track-out to extend 25 feet or more in cumulative length from the point of origin from an active operation, and all track-out from an active operation shall be removed at the end of each workday or evening shift.

- No person shall conduct an active operation with a disturbed surface area of five or more acres, or with a daily import or export of 100 cubic yards or more of bulk material without at least one of the measures listed under subparagraph (d)(5) of Rule 403 at each vehicle egress.

9 SCAQMD Rule 403(d), as Amended June 3, 2005.

Rule 445 – Wood-burning Devices
The purpose of this rule is to reduce the emission of PM from wood-burning devices. Section (d)(1) requires that no person shall permanently install a wood-burning device into any new development.[10]

Rule 1113 – Architectural Coatings
The purpose of this rule is to limit the VOC content of architectural coatings used in the District and applies to any person who supplies, sells, markets, offers for sale, or manufactures any architectural coating that is intended to be field applied within the District and any person who applies, stores at a worksite, or solicits the application of any architectural coating within the District.[11]

Southern California Association of Governments

The SCAG is the federally-designated metropolitan planning agency for Ventura, Los Angeles, Riverside, San Bernardino and Imperial Counties. It works together with the SCAQMD to prepare he above-described AQMP.

Local

City of Los Angeles General Plan

The City of Los Angeles General Plan (GP) includes a Framework Element (LACPD, 1995), which establishes the broad overall policy and direction for the entire GP and provides a citywide context and a comprehensive long-range strategy to guide the comprehensive update of the GP's other elements. The GP is a dynamic document consisting of several elements, as well as the Land Use Element, which consists of the plans for each of the City's 35 Community Plan Areas.

Air Quality Element
The GP's Air Quality Element was adopted in 1992 (LACPD, 1992) as one of the GP's Primary Citywide Elements, which interact to affect the type, location, and intensity of land uses and the timing and phasing of development in the City. Goals and objectives presented in the Air Quality Element that are relevant to the Project are listed below:

Goal 1: Good air quality and mobility in an environment of continued population growth and healthy economic structure.

- Objective 1.1: to reduce air pollutants consistent with the Regional AQMP, increase traffic mobility, and sustain economic growth citywide.
- Objective 1.3: to reduce particulate air pollutants emanating from unpaved areas, parking lots, and construction sites.

Goal 4: Minimal impact of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.

10 SCAQMD Rule 445(d), as Adopted May 3, 2013.
11 SCAQMD Rule 1113, as Amended February 5, 2016.

- Objective 4.1: to include the regional attainment of AAQS as a primary consideration in land use planning.

- Objective 4.2: to reduce vehicle trips and vehicle miles traveled (VMT) associated with land use patterns.

- Objective 4.3: to ensure that land use plans separate major sources of air pollution from sensitive receptors such as schools, hospitals and parks.

Goal 5: Energy efficiency through land use and transportation planning, the use of renewable resources and less polluting fuels, and the implementation of conservation measures including passive methods such as site orientation and tree planting.

- Objective 5.1: to increase energy efficiency of City facilities and private developments.

Goal 6: Citizen awareness of the linkages between personal behavior and air pollution. and participation in efforts to reduce air pollution.

- Objective 6.1: to make air quality education and citizen participation a priority in the City's effort to achieve clean air standards.

Mobility Plan 2035

The Mobility Plan 2035 (MP2035) was adopted September 7, 2016 (LADCP, 2016) and is now an Element of the GP. The MP2035 provides the policy foundation for achieving a transportation system that balances the needs of all road users. As an update to the City's GP Transportation Element (last adopted in 1999), MP2035 incorporates "complete streets" principles and lays the policy foundation for how future generations of Angelenos interact with their streets. The MP2035 Clean Environments & Healthy Communities Goal contains objectives important to air quality such as decreasing VMT per capita by 5% every five years, to 20% by 2035 and reducing the number of unhealthy air quality days to zero by 2025. The following policies aid in reaching those goals and objectives:

- Policy 5.1 Sustainable Transportation: allowing people to make more environmentally sustainable and physically beneficial transportation choices by making other options like walking, biking, and transit seen as a safe, attractive, and convenient mode choice.

- Policy 5.2 VMT: support ways to reduce VMT per capita such as:

    - Land use policies aimed at shortening the distance between housing, jobs, and services that reduce the need to travel long distances daily.

    - Increasing the availability of affordable housing options with proximity to transit stations and major bus stops.

    - Offering more attractive nonvehicle alternatives, including transit, walking, and bicycling.

    - Transportation demand management programs that encourage ride-sharing.

- Pricing mechanisms that encourage commuters to consider alternatives to driving alone, including congestion or cordon pricing, which would charge vehicles entering a congested area (such as downtown during rush hour).

Community Plan

While the GP sets out a long-range vision and guide to future development, the 35 Community Plans provide the specific, neighborhood-level detail, relevant policies, and implementation strategies necessary to achieve the GP objectives. The Project is in the area of the Community Plan, which was last revised in 1999 and amended in 2016 with a Mobility Plan 2035 Update. The Community Plan area encompass the hills and valleys lying east of the Los Angeles River and north of the Boyle Heights Community Plan area, within the City of Los Angeles. It contains goals, objectives and policies that may affect the project:

Public Transportation Goal 11: Develop a public transportation system that improves mobility with convenient alternatives to automobile travel.

- Objective 11-1: To encourage improved local and express bus service throughout the community and bus routes that connect with freeways and rail facilities.
    - Policy 11-1.2: Encourage the expansion, wherever feasible, of programs aimed at enhancing the mobility of senior citizens, disabled persons, and the transit-dependent population.

Toxic Air Contaminants

State

California's air toxics control program was established by two pieces of legislation in the 1980s: the Toxic Air Contaminant Identification and Control Act (AB 1807) and the Air Toxics "Hot Spots" Information and Assessment Act of 1987 (AB 2588). Under AB 1807, the ARB uses a two-step process of risk identification and risk management to address the potential health effects from air toxic substances and protect the public health of Californians (ARB, 2017a). The first step is to determine which compounds and compound classes are to be considered as TACs. After considering criteria relating to "the risk of harm to public health, amount or potential amount of emissions, manner of, and exposure to, usage of the substance in California, persistence in the atmosphere, and ambient concentrations in the community,"[12] the ARB identifies candidate TACs. The Office of Environmental Health Hazard Assessment (OEHHA) then obtains and evaluates information on the health effects of exposure to each candidate compound. The scientific accuracy of the work of the ARB and OEHHA is reviewed by an independent Scientific Review Panel (SRP). After SRP approval, the substances are formally designated as TACs. The second step is for the ARB to develop air toxics control measures (ATCMs) to reduce emissions in the state. Local agencies, including the SCAQMD, may adopt the ATCMs as is, or develop more stringent rules.

The purpose of AB 2588 is to identify individual facilities whose TAC emissions pose a significant health risk to the surrounding community. Using procedures prescribed by the ARB, OEHHA, and (in the SCAB) the SCAQMD, the facility first prepares an air toxics emission inventory. The inventory includes emission from permitted sources and from sources that do not require permits. Then the

12 Health and Safety Code § 39666(f).

facility uses dispersion modeling to estimate maximum one-hour and 70-year annual average exposures at sensitive receptor points, such as residences, schools and hospitals. Exposure of workers in nearby businesses are also estimated. Using concentration-based risk factors from OEHHA, the facility then estimates cancer risk and acute and chronic non-cancer risk. If the cancer risk is above 10 in one million or the non-cancer risk is above a certain threshold, then the facility must prepare and implement a risk reduction plan.

Regional

SCAQMD Regulation XIV, Toxics and Other Non-Criteria Pollutants, comprises 26 rules governing emissions of TACs in the SCAB. As with most other SCAQMD rules, these apply whether or not a facility has a permit. Review of all 26 rules indicates that only one is applicable to the Project:

Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
The purpose of this rule is to specify work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM). The requirements for demolition and renovation activities include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and clean-up procedures, and storage, disposal, and landfilling requirements for asbestos-containing waste materials.[13]

4.2.2.4 Existing Conditions

Regional Air Quality

Table 4.2-2 shows the attainment status of the SCAB for each criteria pollutant for both the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS). The region is currently nonattainment for ozone and $PM_{2.5}$.

13 SCAQMD Rule 1403, as Amended October 5, 2007.

Table 4.2-2
FEDERAL AND STATE ATTAINMENT STATUS

Pollutants	Federal Classification	State Classification
Ozone (O_3)	Nonattainment (Extreme)	Nonattainment
Particulate Matter (PM_{10})	Maintenance (Serious)	Nonattainment
Fine Particulate Matter ($PM_{2.5}$)	Nonattainment (Moderate)	Nonattainment
Carbon Monoxide (CO)	Maintenance (Serious)	Attainment
Nitrogen Dioxide (NO_2)	Maintenance	Attainment
Sulfur Dioxide (SO_2)	Attainment	Attainment
Sulfates	No Federal Standards	Attainment
Lead (Pb)		Attainment
Hydrogen Sulfide (H_2S)		Attainment
Visibility Reducing Particles		Unclassified

Sources:
USEPA, 2018a, USEPA, 2018b, USEPA, 2018c, USEPA, 2018d, USEPA, 2018e.
ARB, 2018b.

Local Air Quality

Existing Pollutant Levels at Nearby Monitoring Stations

The SCAQMD has divided the Basin into source receptor areas (SRAs), based on distinctive meteorological and topographical features. The proposed Project Site is located just inside SCAQMD's Central Los Angeles SRA (SRA 1). The station most representative of the site is the Los Angeles-North Main Station, which is located at 1630 North Main Street, Los Angeles, CA 90012. This station is 2.4 miles southwest of the Project Site. It monitors NO_2, ozone, PM_{10} and $PM_{2.5}$. CO has not been monitored in the Basin since 2012 and no station within a reasonable distance measures SO_2. The ambient air quality data in the proposed Project vicinity as recorded at this station for 2014 to 2016 and the applicable federal and state standards are shown in **Table 4.2-3**.

Existing Health Risk in the Surrounding Area

Since 1986–87 the South Coast Air Quality Management District (SCAQMD) has been conducting Multiple Air Toxics Exposure Studies (MATES) to evaluate regional air toxics health risks in the Basin. While the SCAQMD is currently working on the fifth iteration (MATES V), the last published study is MATES IV (SCAQMD, 2015). The objective of MATES IV was to update the characterization of ambient air toxic concentrations and potential exposures to air toxics in the Basin. The MATES IV report focuses on carcinogenic risks from exposures to air toxics and does not include an analysis of noncancer mortality from exposure to PM.

Since MATES II, ten fixed monitoring sites were located to include areas varying in land use types to obtain a good spatial representation of the Basin, including expected areas of possible elevated toxics levels (e.g., industrial and commercial) and those areas that are not directly near source emissions

(neighborhoods). The monitoring site nearest the Project Site is in Los Angeles at 1630 North Main Street, approximately 2.5 miles southwest.

The average basinwide cancer risk was estimated at 418 per million, with DPM the major contributor. The bulk of the reductions in risk from MATES III results can be attributed to lower levels of ambient DPM. On average, DPM contributes about 68% of the total air toxics risk. The next two largest contributors are benzene and 1,3-butadiene (approximately 8% each), which are, as with DPM, predominately from fossil-fueled combustion. Onroad and offroad mobile sources contribute nearly 92% of the weighted carcinogenic risks in the Basin. None of the annual averages of pollutants measured were above the chronic reference exposure levels (RELs) for noncancer health effects developed by the Office of Environmental Health Hazard Assessment (OEHHA) (SCAQMD, 2015).

The nearest MATES IV site (Central Los Angeles) is located at the Los Angeles-North Main Station, as is the criteria pollutant monitoring activity discussed above. Regional modeling analysis shows carcinogenic risk from air toxics in the grid cell containing Rose Hill Courts is 801 to 1,000 per million.

Table 4.2-3
AMBIENT AIR QUALITY MONITORING DATA

Air Pollutant	Standard/Exceedance	Year		
		2015	2016	2017
Ozone (O_3)	Max. 1-hour Concentration (ppm)	0.104	0.103	0.116
	Max. 8-hour Concentration (ppm)	0.074	0.078	0.086
	# Days > Federal 8-hour Std. of 0.075 ppm	ND	1	9
	# Days > Federal 8-hour Std. of 0.070 ppm *	6	4	14
	# Days > State 1-hour Std. of 0.09 ppm	2	2	6
	# Days > State 8-hour Std. of 0.070 ppm	6	4	16
Respirable Particulate Matter (PM_{10})	State Max. 24-hour Concentration (μg/m³)	88.5	74.6	96.2
	# Days > Fed. 24-hour Std. of 150 μg/m³	0	0	0
	# +Estimated Days > State 24-hour Std. of 50 μg/m³	13.8	ND	ND
	State Annual Average (μg/m³)	27.0	ND	ND
Fine Particulate Matter ($PM_{2.5}$)	Federal Max. 24-hour Concentration (μg/m³)	56.4	44.3	54.9
	State Annual Average (μg/m³)	12.6	12.0	16.3
	# Measured Days > Fed. 24-hour Std. of 35 μg/m³	7	2	6
	Federal Annual Average (μg/m³)	12.3	11.7	12.0
Nitrogen Dioxide (NO_2)	Federal Max. 1-hour Concentration (ppb)	79.1	64.7	80.6
	Annual Average (ppb)	22	20	20
	# Days > Federal 1-hour Std. of 100 ppb	0	0	0
	# Days > State 1-hour Std. of 0.18 ppm	0	0	0

Sources: https://www.arb.ca.gov/adam/topfour/topfour1.php. Accessed November 8, 2018.
* Federal 8-hour standard was changed to 0.070 ppm in 2015.
** ND – There were insufficient (or no) data available to determine the value.

Surrounding Uses and Sensitive Receptors

Some people, such as individuals with respiratory illnesses or impaired lung function because of other illnesses, persons over 65 years of age, and children under 14, are particularly sensitive to certain pollutants. Facilities and structures where these sensitive people live or spend considerable amounts of time are known as sensitive receptors. For the purposes of a CEQA analysis, the SCAQMD

considers a sensitive receptor to be a receptor such as a residence, hospital, or convalescent facility where it is possible that an individual could remain for 24 hours. Commercial and industrial facilities are not included in the definition of sensitive receptor because employees typically are present for shorter periods of time, such as eight hours. Therefore, applying a 24-hour standard for PM_{10} is appropriate not only because the averaging period for the state standard is 24 hours, but because the sensitive receptor would be present at the location for the full 24 hours.

The Project Site is zoned [Q]R-1-1D, and its GP Land Use Map designation is Low Residential (LR).[14] The surrounding and adjacent properties have land use designations for LR and Open Space. The nearest sensitive receptors to the proposed Project Site, with the highest potential to be adversely affected by the proposed Project, are listed in **Table 4.2-4**.

Table 4.2-4
SENSITIVE RECEPTORS NEAR PROJECT SITE

#	Sensitive Receiver Name	Location	Approximate Distance from Proposed Project (Feet)
1	**Nearest Residence** 4357 Sardonyx Street Los Angeles, CA 90032	Latitude: 34.085797 Longitude: -118.192601	78
2	**Huntington Drive Elementary School** 4435 Huntington Drive, N Los Angeles, CA 90032	Latitude: 34.082668 Longitude: -118.191834	1,211
3	**Our Lady of Guadalupe Rose Hill (School)** 4522 Browne Avenue Los Angeles, CA 90032	Latitude: 34.086300 Longitude: -118.190587	151

Existing Project Site Emissions

Existing criteria pollutant emissions from the Project Site were estimated with the CalEEMod model, which is described in **Section 4.2.3.2**. Results are shown in **Table 4.2-5**. Existing emissions were subtracted from Project emissions to obtain net changes in emissions from the site.[15]

14 See Initial Study **Section 2.0,** Environmental Setting, **Figure 2.2-4** and **Figure 2.2-6** for General Plan land use designations and zoning in the project area.
15 See **Table 4.2-8**.

Table 4.2-5
EXISTING CRITERIA POLLUTANT EMISSIONS FROM PROJECT SITE

Criteria Pollutant	Emissions	
	Maximum Pounds/Day	Tons/Year
Reactive Organic Gases	6.9	**1.19**
Nitrogen Oxides	8.3	1.43
Carbon Monoxide	31.1	**4.73**
Respirable Particulate Matter (PM_{10})	5.4	**0.88**
Fine Particulate Matter ($PM_{2.5}$)	**1.5**	0.25

Source: *OB-1 Air Analyses, February, 2019.*

4.2.3 Project Impacts

4.2.3.1 Thresholds of Significance

State CEQA Guidelines Appendix G

In accordance with *State CEQA Guidelines* Appendix G, implementation of the project would result in a potentially significant impact related to air quality if it would:

Threshold (a): ***Conflict with or obstruct implementation of the applicable air quality plan; or***

Threshold (b): ***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; or***

Threshold (c): ***Expose sensitive receptors to substantial pollutant concentrations; or***

Threshold (d): ***Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.***

2006 L.A. CEQA Thresholds Guide

To assist in answering the Appendix G Threshold questions above and the thresholds provided by the AQMD, this analysis utilizes factors and considerations identified in the 2006 City of Los Angeles CEQA Thresholds Guide (City of Los Angeles, 2006), as appropriate. The City of Los Angeles Thresholds Guide identifies criteria to evaluate impacts related to air quality during project construction and operation.

SCAQMD's *CEQA Air Quality Handbook*

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the significance determinations. As will be discussed in the next section, the SCAQMD has developed a *CEQA Air Quality Handbook* to provide a protocol for air quality analyses that are prepared under the requirements of CEQA.

To assist in implementing the air quality plans, the SCAQMD developed criteria for determining whether emissions from a project are regionally significant. They are useful for estimating whether a project is likely to result in a violation of the NAAQS and/or whether the project is in conformity with plans to achieve attainment. The SCAQMD no longer has "indirect source" rules,[16] e.g., rules that place restrictions on housing or commercial development, or require reductions in trip generation and/or VMT to developed commercial or industrial sites. Instead, the District has published guidance on conducting air quality analyses under CEQA (SCAQMD, 1993).

Emission Thresholds for Regional Air Quality Impacts

SCAQMD's significance thresholds are summarized in **Table 4.2-6** for criteria pollutant emissions during construction activities and project operation. A project is considered to have a regional air quality impact if emissions from its construction and/or operational activities exceed the corresponding SCAQMD significance thresholds.

Table 4.2-6
SCAQMD EMISSIONS THRESHOLDS FOR SIGNIFICANT REGIONAL IMPACTS

Pollutant	Mass Daily Thresholds (Pounds/Day)	
	Construction	Operation
Nitrogen Oxides (NOx)	100	55
Volatile Organic Compounds (VOC)	75	55
Respirable Particulate Matter (PM_{10})	150	150
Fine Particulate Matter ($PM_{2.5}$)	55	55
Sulfur Oxides (SOx)	150	150
Carbon Monoxide (CO)	550	550
Lead	3	3

Source: SCAQMD 2015. Accessed March 16, 2018.

Emission Thresholds for Localized Air Quality Impacts

As part of its environmental justice program to address localized air quality impacts of development projects, the SCAQMD developed localized significance thresholds (LSTs) in 2003 and revised them in 2008 (Chico and Koizumi, 2008). Since the original LST Guidance did not include $PM_{2.5}$, in 2006,

16 Two indirect source rules (1501 – Work Trip Reduction Plans and 1501.1 – Alternatives to Work Trip Reduction Plans) were repealed in 1995.

the SCAQMD published a method to calculate LSTs for $PM_{2.5}$ (Krause and Smith, 2006). LSTs represent the maximum NO_X, CO, PM_{10}, and $PM_{2.5}$ emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state AAQS. NO_X and CO LSTs are based on the ambient concentrations of that pollutant for each SRA[17] and distance to the nearest offsite receptor. For PM_{10}, LSTs were based on requirements in SCAQMD Rule 403. Note that the LST analysis does not apply to VOC emissions, since there is no AAQS for VOC. Also note that the use of LSTs is voluntary, to be implemented at the discretion of the lead agency pursuant to CEQA.

For the purposes of a CEQA analysis, the SCAQMD considers a sensitive receptor to be a receptor such as a residence, hospital, or convalescent facility where it is possible that an individual could remain for 24 hours. Commercial and industrial facilities are not included in the definition of sensitive receptor, because employees typically are present for shorter periods of time, such as eight hours. Therefore, applying a 24-hour standard for PM_{10} is appropriate not only because the averaging period for the state standard is 24 hours, but because the sensitive receptor would be present at the location for the full 24 hours. Localized significance thresholds for the Project Site are shown in **Table 4.2.7**. They are discussed further in **Sections 4.2.4** and **4.2.5**.

Table 4.2-7
LOCALIZED SIGNIFICANCE THRESHOLDS FOR PROJECT

Pollutant	Maximum Emissions (lb/day)
Nitrogen Oxides	108
Carbon Monoxide	1,048
Respirable Particulate Matter (PM_{10})	8
Fine Particulate Matter ($PM_{2.5}$)	5

In addition, the SCAQMD has defined the following significance thresholds for exposure to TACs:

- Maximum Incremental Cancer Risk ≥ 10 in 1 million.
- Cancer Burden > 0.5 excess cancer cases (in areas where risk ≥ 1 in 1 million).
- Chronic & Acute Hazard Index[18] ≥ 1.0 (project increment).

Impacts of Carbon Monoxide Hotspots

Increased local vehicle traffic may contribute to offsite air quality impacts. The traffic increases in nearby intersections may contribute to traffic congestion, which may create "pockets" of CO called hotspots. These pockets have the potential to exceed the state 1-hour standard of 20 parts per million (ppm) and/or the 8-hour standard of 9.0 ppm, thus affecting sensitive receptors that are close to these roadways or intersections. CO hotspots historically were found at busy intersections but could

17 The SCAQMD has defined 38 source receptor areas for various regulatory purposes. Each SRA is assumed to have a unique set of geographic and meteorological characteristics.
18 The hazard index is the ratio between the modeled concentration of a specific TAC and a threshold value set by OEHHA for that TAC.

also occur along congested major arterials and freeways. They occurred mostly in the early morning hours when winds are stagnant and ambient CO concentrations are elevated.

It has long been recognized that CO exceedances are caused by vehicular emissions,[19] primarily when vehicles are idling at intersections.[20,21] Accordingly, vehicle emissions standards have become increasingly more stringent. Before the first vehicle emission regulations, cars in the 1950s were typically emitting about 87 grams of CO per mile.[22] Currently, the CO standard in California is a maximum of 3.4 grams/mile for passenger cars (with provisions for certain cars to emit even less).[23] With the turnover of older vehicles, introduction of cleaner fuels and implementation of control technology on industrial facilities, CO concentrations in the Air Basin have steadily declined.

An analysis prepared for CO attainment in the SCAB by the SCAQMD can be used to assist in evaluating the potential for CO exceedances due to development projects. CO attainment was thoroughly analyzed as part of the SCAQMD's 2003 Air Quality Management Plan (2003 AQMP) and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan).[24] In the 1992 CO Plan, a CO hot spot analysis was conducted for the four worst-case scenario intersections in Los Angeles County at the peak morning and afternoon time periods. The intersections evaluated included Long Beach Boulevard and Imperial Highway (Lynwood); Wilshire Boulevard and Veteran Avenue (Westwood); Sunset Boulevard and Highland Avenue (Hollywood); and La Cienega Boulevard and Century Boulevard (Inglewood). These analyses did not predict a violation of CO standards. The peak modeled CO concentrations due to vehicle emissions occurred at the intersection of Wilshire Boulevard and Veteran Avenue, which had a daily traffic volume of approximately 100,000 vehicles. The 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 ppm, which indicates that the most stringent 1-hour CO standard (20.0 ppm) would likely not be exceeded until the daily traffic at the intersection exceeded more than 400,000 vehicles per day.[25] The AQMP CO hotspots modeling also took into account worst-case meteorological conditions and background CO concentrations. The Los Angeles County Metropolitan Transportation Authority (Metro) evaluated the level of service (LOS) in the vicinity of the Wilshire Boulevard and Veteran Avenue intersection and found it to be Level E for peak morning traffic and Level F for peak afternoon traffic.[26,27] If a project intersection does not exceed 400,000 vehicles per day, then the project does not need to prepare a detailed CO hotspots analysis using California LINE Source Dispersion Model, version 4 (CALINE4), which is a model used to assess air quality impacts near transportation facilities (i.e., roadways, intersections, street canyons, and parking facilities).

19 USEPA. 2000. Air Quality Criteria for Carbon Monoxide. EPA 600/P-099/001F.
20 SCAQMD. 1993. CEQA Air Quality Handbook. Section 4.5.
21 SCAQMD. 2003. Air Quality Management Plan.
22 USEPA, Timeline of Major Accomplishments in Transportation, Air Pollution, and Climate Change, www.epa.gov/air-pollution-transportation/timeline-major-accomplishments-transportation-air-pollution-and-climate, accessed January 17, 2018.
23 California Air Resources Board. California 2015 and Subsequent Model Criteria Pollutant Exhaust Emission Standards and Test Procedures and 2017 and Subsequent Model Greenhouse Gas Exhaust Emission Standards and Test Procedures for Passenger Cars, Light-Duty Trucks, and Medium-Duty Vehicles. Adopted March 22, 2012.
24 SCAQMD, 1992. Federal Attainment Plan for Carbon Monoxide.
25 Based on the ratio of the CO standard (20.0 ppm) and the modeled value (4.6 ppm).
26 The Metropolitan Transportation Authority measured traffic volumes and calculated the LOS for the intersection of Wilshire Blvd./ Sepulveda Ave. which is a block west along Wilshire Blvd., still east of Interstate 405.
27 Metropolitan Transportation Authority. 2004. Congestion Management Program for Los Angeles County. Exhibit 2-6 and Appendix A.

Asbestos

The threshold of significance for asbestos is the presence of the material in friable form. Due to the age of the buildings to be demolished, the presence of asbestos is highly probable. Therefore, the owner or operator of any demolition activity must comply with SCAQMD Rule 1403. Compliance must include a facility survey for the presence of asbestos prior to any demolition activity; notification of the SCAQMD of the intent to conduct any demolition activity; and, if asbestos is discovered, removal of the asbestos according to an asbestos removal schedule. Asbestos presence and abatement are discussed further in **Section 4.7**.

4.2.4 Methodology

Construction

Regional Emissions

Methodologies incorporated in the California Emissions Estimator Model® (CalEEMod) Version 2016.3.2 (CAPCOA, 2017) and onroad emission factors from EMFAC2014 (v1.0.7) for applicable calendar years in the Los Angeles County portion of the SCAB were used to estimate construction emissions for offroad equipment exhaust; onroad exhaust emissions from construction employee commute and vendor activity; and onroad exhaust emissions from hauling activity. (CalEEMod outputs are presented in **Appendix G** to this document.)

Construction activities in each project phase will be divided into five non-overlapping subphases. **Table 4.2-8** shows the off-road equipment use in each subphase, for both Phase I and II. The "load factor" in the rightmost column is the fraction of the time that a given type of equipment is operating in a way to emit air pollutants.

Table 4.2-8
CONSTRUCTION EQUIPMENT FOR PHASES I AND II

Subphase	Equipment Type	No. of Pieces	Hours/ Day	Horse-power	Load Factor
Demolition	Concrete/Industrial Saws	1	8	81	0.73
	Excavators	3	8	158	0.38
	Rubber-Tired Dozers	1	8	247	0.40
	Tractors/Loaders/Backhoes	3	8	97	0.37
Grading	Excavators	1	8	158	0.38
	Graders	1	6	187	0.41
	Rubber-Tired Dozers	1	6	247	0.40
	Tractors/Loaders/Backhoes	1	7	97	0.37
Building Construction	Cranes	1	6	231	0.29
	Forklifts	1	6	89	0.20
	Generator Sets	1	8	84	0.74
	Tractors/Loaders/Backhoes	1	6	97	0.37
	Welders	3	8	46	0.45
Paving	Cement and Mortar Mixers	1	6	9	0.56
	Pavers	1	6	130	0.42
	Paving Equipment	1	8	132	0.36
	Rollers	1	7	80	0.38
	Tractors/Loaders/Backhoes	1	8	97	0.37

Architectural Coating	Air Compressors	1	6	78	0.48

[a]The same equipment types, numbers of pieces, and equipment characteristics apply to both phases.

It was assumed in the modeling that all applicable provisions of SCAQMD Rule 403 would be followed. CalEEMod considers these control measures to be "mitigation," although, being legally mandatory, they are not considered as such in this EIR.

Localized Significance Analysis for Criteria Pollutants

The purpose of this analysis is to estimate whether ambient air quality standards for NO_2, CO, PM_{10} or $PM_{2.5}$ would be violated in the immediate vicinity of the Project. To facilitate impact analysis, the SCAQMD developed a methodology for modeling for the many combinations of project footprint area, source-receptor distance, and local meteorology in the SCAB (Chico and Koizumi, 2008). From the results of the analysis, SCAQMD developed mass rate look-up tables that can be used to determine whether a project's emissions may generate significant localized air quality impacts on offsite receptors (including sensitive receptors). Based on the SRA number, the distance to the receptor and the site area, the output of the modeling is a set of pollutant-specific emission thresholds.

Toxic Air Contaminants

The chief toxic air contaminant during construction is diesel particulate matter (DPM), a carcinogen. The SCAQMD's significance thresholds for carcinogens are based upon 30 years of continuous exposure. Since construction exposure will be a tiny fraction of that duration, the thresholds will not be reached. Risk threshold for non-cancer risks of DPM have not been established. For these reasons, the analysis of TAC emissions during construction was mainly qualitative. TAC emissions are discussed in more detail in **Section 4.2.5.1**.

Operation

For the operational emissions calculations, CalEEMod's "default" assumptions were used, except for the following:

- The trip generation rates were for affordable housing, as defined by the City of Los Angeles Department of Transportation. These rates are lower than for "Multifamily Residential (ITE 220)," which is the CalEEMod default. (See **Section 4.12**.)

- Project design features that reduce energy use and consequently reduce emissions of certain air pollutants were incorporated into the CalEEMod analysis. A list of project design features is in **Greenhouse Gas Emissions Section 4.6.3.3**.

4.2.4.1 Analysis of Project Impacts

Threshold (a): Would the Project conflict with or obstruct implementation of the applicable air quality plan?

The SCAQMD's 2016 AQMP, discussed above, is based upon population, employment and housing projections in SCAG's 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (SCAG, 2016). The RTP/SCS is in turn based upon local plans and policies, including the City of Los Angeles General Plan. According to an analysis of data in the RTP/SCS, the forecasted

population of the City of Los Angeles subregion in the baseline year[28] of 2018 and the first fully operational year of 2024 will be 4,009,193 and 4,172,886, respectively.[29] The growth in population thus would be 163,693 persons. As discussed in **Section 4.10.2**, the population of the Project is expected to grow from 221 residents at the end of 2018 to 656 at full occupancy, an increase of 435. For purposes of highly conservative analysis, it is assumed that all the new residents are from outside the City of Los Angeles subregion. The Project's growth represents 0.265% of the population growth forecast for the subregion.

The Project would be consistent with the growth projections in both the AQMP and the 2016-2040 RTP/SCS. This means that these two documents took into account developments such as the Project in their modeling and analyses and the 2016-2040 RTP/SCS vehicle trip and VMT reduction goals and policies. Since these growth assumptions are built into the 2016 AQMP demonstration of attainment with NAAQS and CAAQS, it is also expected that the Project would not delay the attainment of those standards.

Additionally, to assist the implementation of the AQMP, projects must not create regionally significant emissions of regulated pollutants from either short-term construction or long-term operations. As demonstrated under Threshold (b) below, neither short-term (construction) nor long-term (operational) emissions would exceed the significance thresholds established by the SCAQMD.

Based on the discussion above, project impacts related to consistency with applicable air quality plans would be less than significant.

Threshold (b): ***Would the Project 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?***

Short-Term Construction

The Project will be built in two phases.[30] During Phase I, 20 units and a community center would be demolished and during Phase II, 80 units would be demolished. Phase I construction activity will consist of construction of 89 units and a surface parking area. Phase II will consist of construction of 96 units along with a community building, surface-level parking areas, and tuck-under parking. Phase I construction activity is expected to begin in March 2021 and take approximately 18 months to complete and Phase II is expected to begin in December 2022 and take approximately 19 months to complete. The Project is proposed to be fully operational in 2024.

Since the existing site will probably have construction material that contains asbestos, the resulting construction debris would have to be disposed of at a landfill that can accept asbestos. The nearest acceptable landfill would be Waste Management Inc.'s Azusa Land Reclamation site at 1211 W. Gladstone in Azusa, (Waste Management, 2018) approximately 23 miles from the Project Site.

28 Per CEQA Guidelines § 15125(a)(1), the baseline year for an EIR is the date of the Notice of Preparation, which was filed on September 19, 2018.

29 The populations reported here were calculated by a linear interpolation between the RTP/SCS' forecasts for 2012 and 2040.

30 The construction phases will not overlap in time, so their maximum daily emissions are not additive.

As shown in **Table 4.2-9,** all construction emissions associated with the Project would be below the regional significance thresholds. **Therefore, impacts related to air quality during project construction would be less than significant.**

Table 4.2-9
ESTIMATED CONSTRUCTION EMISSIONS

Construction Phase/Year	Maximum Daily Emissions (lbs)				
	ROG	NO_X	CO	PM_{10}	$PM_{2.5}$
Phase I – Year 2021	2.8	**26.6**	**25.0**	**3.3**	**1.8**
Phase I – Year 2022	35.1	13.6	15.3	1.4	0.8
Phase II – Year 2022	2.4	**23.1**	**24.5**	**1.8**	**1.2**
Phase II – Year 2023	2.1	**19.7**	**24.0**	**3.1**	**1.5**
Phase II – Year 2024	**54.8**	11.9	14.9	1.3	0.7
SCAQMD Daily Regional Threshold	*75*	*100*	*550*	*150*	*55*
Exceed Thresholds?	*No*	*No*	*No*	*No*	*No*

Source: *OB-1 Air Analyses, April 2019.*

Long-Term Operational Emissions

The primary source of operational emissions would be vehicle exhaust emissions generated from project-induced vehicle trips, known as "mobile source emissions." Other emissions, identified as "energy source emissions," would be generated from energy consumption for water, space heating, and cooking equipment while "area source emissions" would be generated from structural maintenance and landscaping activities, and use of consumer products. No hearths or fireplaces will be included in the Project.

Since the existing site is currently producing operational emissions that would be eliminated prior to constructing the proposed Project, the environmental effect of the project would be the net emissions difference. Operational emissions from the existing configuration of buildings and the built-out configuration of the proposed Project were estimated using the operational module of CalEEMod. Default values generated by CalEEMod, including trip rate, expected vehicle fleet mix, and vehicle traveling speed and distance assumptions, were used in each model run. The model-predicted area source, energy source, and mobile source emissions for net effect of the proposed Project are presented in **Table 4.2-10**. Detailed output sheets are provided in **Appendix G**.

As seen in **Table 4.2-10**, for each criteria pollutant, net operational emissions would be below the pollutant's SCAQMD significance threshold. In addition, ROG and NO_x emissions would decrease from existing levels. **Therefore, operational criteria pollutant emissions would be less than significant.**

Table 4.2-10
MAXIMUM DAILY PROJECT OPERATIONAL EMISSIONS

Emission Source	Pollutant (lbs/day)				
	ROG	NO_X	CO	PM_{10}	$PM_{2.5}$
Area Sources	4.44	0.18	15.25	0.08	0.08
Energy Sources	0.07	0.59	0.25	0.05	0.05
Mobile Sources	1.13	5.02	15.33	5.59	1.52
Project Total Emissions	**5.6**	**5.8**	**30.8**	**5.7**	**1.7**
Minus Existing Emissions	3.4	4.8	21.3	3.1	0.9
Project Net Emissions	**2.2**	**1.0**	**9.5**	**2.6**	**0.8**
SCAQMD Significance Thresholds	*55*	*55*	*550*	*150*	*55*
Significant (Yes or No)	**No**	**No**	**No**	**No**	**No**

Source: *OB-1 Air Analyses, February 2019.*

According to the CEQA Guidelines, a lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved air quality attainment or maintenance plan.[31] As described above, the Project would not exceed any of the SCAQMD daily criteria pollutant thresholds. In general, cumulative *regional* impacts of construction and operation of all projects in the SCAB at any given time are accounted for in the AQMP. The proposed Project is compliant with the AQMP, so the incremental contribution of the Project would not be cumulatively considerable. The only cumulative impacts with the potential for significance would be localized impacts during construction. **The analysis for Threshold (c) shows that localized impacts from the Project would be less than significant and therefore would not contribute to a cumulative impact.**

Threshold (c): Would the Project expose sensitive receptors to substantial pollutant concentrations?

Following SCAQMD LST Guidance (Chico and Koizumi, 2008), only onsite construction emissions were considered in the localized significance analysis. It was estimated that the largest area of construction activity on a single day would be two acres. As seen in **Table 4.2-4**, the nearest sensitive receptor to the Project is about 78 feet (24 meters) away. The SCAQMD LST Guidance recommends using 25 meters for cases in which the distance is less than that value. The activity with the largest emissions of NO_x and CO would be demolition during Phase I. The activity with the largest emissions of PM_{10} and $PM_{2.5}$ would be grading during Phase I. LSTs were obtained from tables in Appendix C of the SCAQMD's LST Guidance. **Table 4.2-11** shows the results of the localized significance analysis for the proposed Project. Emissions of no criteria pollutant would exceed its threshold for significance.

31 CEQA Guidelines, § 15064(h)(3).

Therefore, localized air pollution impacts from construction activity would be less than significant.

Table 4.2-11
RESULTS OF LOCALIZED SIGNIFICANCE ANALYSIS

Nearest Sensitive Receptor	Maximum Onsite Emissions (lbs/day)			
	NO_x	CO	PM_{10}	$PM_{2.5}$
Residence	26.2	24.3	3.1	1.7
SCAQMD LST for 2 acres @ 25 meters	*108*	*1,048*	*8*	*5*
Significant (Yes or No)	**No**	**No**	**No**	**No**

Sources:
OB-1 Air Analyses, April 2019.
[a] Thresholds are for source-receptor area 1 (Central Los Angeles)

Although sensitive receptors would be exposed to diesel exhaust from construction equipment, which has been associated with lung cancer (OEHHA, 1998), the duration of exposure would not be sufficient to result in a significant cancer risk. Carcinogenic health risk assessments are based upon an assumption of 30 years continuous residential exposure,[32] while the exposure in the present case would be for about 6,488 hours during construction.[33] Additionally, the SCAQMD CEQA guidance does not require a health risk assessment for short-term construction emissions. Therefore, no cancer health risk assessment was necessary. Acute non-cancer risk assessments are based upon one-hour maximum exposures, but acute RELs for diesel exhaust and DPM have not been established by the OEHHA (OEHHA, 2016).

The localized significance analysis that was done here for construction is not normally done for the operational phase of projects of this type. The reason, as explained by the SCAQMD (Krause and Smith, 2006), is that by far the highest emissions from operations are from onroad motor vehicles, which travel over a large geographical area. "Local" receptors are highly dispersed, so that each one receives a tiny fraction of the emissions. Meanwhile, emissions from onsite sources are minor.

Asbestos

Many buildings constructed before the late 1990s contain asbestos.[34] Asbestos was widely used in the construction industry in thousands of materials. Some asbestos containing materials (ACM) are judged to be more dangerous than others due to the species of asbestos, amount of ACM and the material's friable nature. Sprayed coatings, pipe insulation, and asbestos insulating board are thought to be the most dangerous due to their high content of amphibole asbestos and friable nature. Since the existing buildings were built in 1942, asbestos will be expected and must be abated to comply

32 South Coast Air Quality Management District. 2018. AB 2588 and Rule 1402 Supplemental Guidelines. (Supplemental Guidelines for Preparing Risk Assessments for the Air Toxics "Hot Spots" Information and Assessment Act). Diamond Bar, CA. September. http://www.aqmd.gov/docs/default-source/planning/risk-assessment/ab-2588-supplemental-guidelines-201809.pdf?sfvrsn=6.
33 This constitutes about 2.5% of a 30-year continuous exposure.
34 Asbestos is also discussed in **Section 4.7**.

with SCAQMD Rule 1403. To comply with this Rule, the contractor is required to have an asbestos survey performed by a Cal/OSHA Certified Asbestos Consultant (CA Department of Industrial Relations, 2018) and to submit an asbestos notification form with a fee to the SCAQMD at least 10 working days prior to any demolition activity.[35] **Compliance will result in a less than significant effect from exposure to asbestos.**

CO Hotspots

As discussed in **Section 4.2.3.1**, if a project intersection does not exceed 400,000 vehicles per day, then the project does not need to prepare a detailed CO hotspots analysis.

At buildout of the Project, the highest number of average daily trips at an intersection under the "Future Post Project (With Project) Conditions"[36] would be approximately 15,510 at the Monterey Road and Huntington Drive intersection (KOA, 2019),[37] which is significantly below the daily traffic volumes that would be expected to generate CO exceedances as evaluated in the 2003 AQMP.[38] This daily trip estimate is based on the peak hour conditions of the intersection. There is no reason unique to the Air Basin meteorology to conclude that the CO concentrations at the Monterey Road and Huntington Drive intersection would exceed the 1-hour CO standard if modeled in detail, based on the studies undertaken for the 2003 AQMP.[39] Therefore, the Project does not trigger the need for a detailed CO hotspots model and would not cause any new or exacerbate any existing CO hotspots. **As a result, impacts related to localized mobile-source CO emissions are considered less than significant.**

Threshold (d): Would the Project result in other emissions (such as odors or dust) adversely affecting a substantial number of people?

The CEQA guidelines indicate that a significant impact would occur if the proposed project would create objectionable odors affecting a substantial number of people. Construction activities for the proposed project would generate airborne odors and dust associated with the operation of construction vehicles (i.e., diesel exhaust), asphalt patching operations, and the application of paints and coatings. These emissions would occur during daytime hours only and would be isolated to the immediate vicinity of the construction site and activity. Therefore, they would not affect a substantial number of people. When Project construction is completed, odors from the proposed uses of the proposed project would generally be regarded as similar to those of the existing housing.

35 Additional compliance information was published in a SCAQMD Advisory Notice dated March 27, 2019 and titled "Important Notice to all Facility Owners and Contractors Performing Renovations or Demolitions Re: Asbestos." http://www.aqmd.gov/docs/default-source/compliance/Asbestos-Demolition-/rule-1403-compliance-advisory.pdf?sfvrsn=8 .

36 Defined in **Section 4.12.3**.

37 The maximum peak hour traffic (AM) at this intersection is estimated to be 1,551. An estimate of daily traffic through the intersection was obtained by multiplying the peak hour value by 10. Personal communication from Brian Marchetti, KOA Corporation to Michael Rogozen, UltraSystems Environmental Inc. March 26, 2019.

38 The 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 ppm, which indicates that the most stringent 1-hour CO standard (20.0 ppm) would likely not be exceeded until the daily traffic at the intersection exceeded more than 400,000 vehicles per day.

39 It should be noted that CO background concentrations within the vicinity of the modeled intersection have substantially decreased since preparation of the 2003 AQMP. In 2003, the 1-hour background CO concentration was 5 ppm and has decreased to 2 ppm in 2014.

development; there would be no change. **Therefore, the impact of odors would be less than significant.**

4.2.5 Cumulative Impacts

According to the CEQA Guidelines, a lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved air quality attainment or maintenance plan.[40] As described in **Section 4.2.3.3**, the Project would not exceed any of the SCAQMD daily criteria pollutant thresholds. In general, cumulative *regional* impacts of construction and operation of all projects in the SCAB at any given time are accounted for in the AQMP. **The proposed Project is compliant with the AQMP, so the incremental contribution of the project would not be cumulatively considerable.**

Based on SCAQMD guidance, individual construction projects that exceed the recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment. As shown above, construction-related daily emissions at the Project Site would not exceed any of SCAQMD's regional or localized significance thresholds including NO_X, CO, PM_{10} and $PM_{2.5}$ **Therefore, the Project's contribution to cumulative air quality impacts due to localized emissions would not be cumulatively considerable and, therefore, would be less than significant.**

As discussed above, while diesel particulate matter and other TACs are emitted during construction, the duration of exposure would not be sufficient to result in a significant cancer risk or noncancer health risk. TAC emissions from operations would be negligible. **The incremental contribution of the Project would not be cumulatively considerable.**

Finally, odors from project operations will be typical of those from residential areas, and will not differ from those under baseline conditions. **The incremental contribution of the Project would not be cumulatively considerable.**

4.2.6 Mitigation Measures

As discussed above, the Project would result in less than significant impacts related to air quality and no mitigation measures are required. The Project would comply with all applicable requirements of the SCAQMD Rule 403.

4.2.7 Level of Significance After Mitigation

No significant impacts related to regional or localized emissions during construction or operation are anticipated to occur as a result of the Project. Through compliance with state mandates and other applicable regulatory requirements, impacts related to air quality would be less than significant.

40 CEQA Guidelines, § 15064(h)(3).

4.3 Biological Resources

4.3.1 Introduction

This section of the Draft EIR provides an analysis of the Project's potential impacts with regard to biological resources. The analysis is based on the Biological Resources Evaluation (BRE) conducted for the Project. The BRE report (UltraSystems, 2019a) is included in **Appendix H** of this Draft EIR.

4.3.2 Environmental Setting

4.3.2.1 Regulatory Framework

Federal

Federal Endangered Species Act (ESA)

The Federal Endangered Species Act (ESA) of 1973 (Title 16, United States Code [U.S.C.] §§ 1531-1543), as amended, designates and provides for protection of listed threatened and endangered plant and animal species, and their critical habitat. The United States Fish and Wildlife Service (USFWS), in the Department of the Interior, and the National Oceanic and Atmospheric Administration's National Marine Fisheries Service (NMFS), in the Department of Commerce, share responsibility for administration of the ESA. These responsibilities include listing and delisting species, designating critical habitat, and formulating recovery plans. The USFWS has primary responsibility for terrestrial and freshwater organisms, while the responsibilities of NMFS are mainly marine wildlife.

Migratory Bird Treaty Act (MBTA)

The Migratory Bird Treaty Act (MBTA) of 1918 (Title 16, U.S.C. §§ 703-712), as amended, includes provisions for protection of migratory birds, including basic prohibitions against any take not authorized by federal regulation. The administering agency for the above authority is the USFWS. The law contains no requirement to prove intent to violate any of its provisions. Wording in the MBTA makes it clear that most actions that result in "take" or possession (permanent or temporary) of a protected species can be a violation of the act. The word "take" is defined as "pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to pursue, hunt, shoot, wound, kill, trap, capture, or collect (including nests, eggs, and feathers)." The provisions of the MBTA are nearly absolute; "except as permitted by regulations" is the only exception.

Clean Water Act of 1977: § 401

Pursuant to § 401 of the Clean Water Act (CWA), a water quality certification is required from the California State Water Resources Control Board (SWRCB) for § 404 permit activities in multiple regions. The SWRCB certifies that the discharge complies with state water quality standards and ensures that there is no net loss of wetlands through impact avoidance, minimization, and mitigation.

Clean Water Act of 1977; § 404

Waters of the U.S. including wetlands are subject to U.S. Army Corps of Engineers (USACE) jurisdiction under § 404 of the CWA. A § 404 permit is required for the discharge of dredged or fill material into Waters of the U.S. The Los Angeles District of the USACE would provide review and

permitting services for this Project. Section 401 CWA requires project owners or proponents to obtain a Water Quality Certification which requires their project to prevent the discharge or dredge and fill material in quantities that would violate federal water quality standards. In the State of California, the SWRCB) and its nine Regional Water Quality Control Boards (RWQCBs) have been given the authority to issue § 401 Water Quality Certifications (WQCs).

The SWRCB and its RWQCBs may, at their discretion, use the § 401 WQC Program to also implement the California Porter-Cologne Water Quality Control Act since both § 401 and *Porter-Cologne* require that a proposed discharge will comply with water quality standards, which include numeric and narrative water quality objectives applicable to identified surface and ground waters in the State of California. These water quality objectives are designated in the Water Quality Control Plans (Basin Plan) that are prepared, updated, and implemented by each RWQCB.

Executive Order 11990, Protection of Wetlands (May 24, 1977)

This order provides for the protection of wetlands. The administering agency is the USACE. If impacts on wetlands cannot be avoided, then all practicable measures to minimize harm to those wetlands must be included and documented in the final environmental document for the proposed project or activity.

Executive Order 13112. Invasive Species (February 3, 1999)

This order requires Executive Branch agencies to work to prevent and control the introduction and spread of invasive species. Non-native flora and fauna can cause substantial changes to native ecosystems, upset native ecological balances, and have the potential to also cause economic harm. Roads and highways provide opportunities for the movement and spread of non-native, invasive species through an area, from the local to the national level.

State

California Endangered Species Act (CESA) of 1984, California Fish and Game Code §§ 2050-2098

This act includes provisions for the protection and management of wildlife species listed by the State of California as endangered or threatened, or designated as candidates for such listings. This act includes a requirement for consultation "to ensure that any action authorized by a state lead agency is not likely to jeopardize the continued existence of any endangered or threatened species…or result in the destruction or adverse modification of habitat essential to the continued existence of the species" (§ 2090). Plants of California declared to be endangered, threatened, or rare are listed under 14 CCR § 670.2. Animals of California declared to be endangered, threatened, or rare (also referred to as "sensitive" wildlife species) are listed under 14 CCR § 670.5. The administering agency for the above authority is the CDFW.

Native Plant Protection Act of 1977; California Fish and Game Code § 1900 et. seq.

The Native Plant Protection Act prohibits import of rare and endangered plants into California, take of rare or endangered plants, and sale of rare and endangered plants. CESA defers to the California Native Plant Protection Act (CNPPA), which ensures that plant species listed by the State as endangered, threatened, or rare ('sensitive' plant species) are protected when state agencies are

involved in projects or activities subject to CEQA. In this instance, plants listed as rare under the CNPPA are not protected under CESA, but rather under CEQA.

California Fish and Game Code § 3503 and § 3503.5

This act provides for the protection and enhancement of birds by declaring "It is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto (§ 3503), and that "It is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto (§ 3503.5).

California Fish and Game Code §§ 1930-1940

These code sections provide the Significant Natural Areas program and database. The administering agency for the above authority is the CDFW.

California Fish and Game Code §§ 1600–1616 Lake or Streambed Alteration

Section 1600-1616 of the California Fish and Game Code protects the natural flow, bed, channel, and bank of any river, stream, or lake designated by the CDFW, in which there is at any time an existing fish or wildlife resource, or from which ecosystem these resources derive benefit. General project plans must be submitted to CDFW in sufficient detail to indicate the nature of a project for construction, if the project would: divert, obstruct, or change a streambed; use material from the streambed; result in the disposal or deposition of debris, waste, or other material containing crumbled, flaked, or ground pavement where it can pass into a stream.

Any person or entity whose project or activity may result in any of the above must first notify CDFW in writing. CDFW will review the project or activity and decide if it may continue or if they must issue an Agreement, which would stipulate mitigation measures for the protection of the aquatic resource in question.

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act defines "water quality objectives" as the allowable "limits or levels of water quality constituents or characteristics which are established for the reasonable protection of beneficial uses of water or the prevention of nuisance within a specific area". Thus, water quality objectives are intended to protect the public health and welfare, and to maintain or enhance water quality in relation to the existing and/or potential beneficial uses of the water. Water quality objectives apply to both Waters of the United States and Waters of the State.

Construction General Permit Order 2009-009-DWQ (as amended)

The SWRCB and its nine RWQCBs implement water quality regulations under the federal CWA and California Porter Cologne Water Quality Control Act. Existing water quality regulations require compliance with the National Pollutant Discharge Elimination System (NPDES) for discharges of storm water runoff associated with construction activity.

Dischargers whose projects disturb one or more acres of soil are required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity

(Construction General Permit, 2009-009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ). Construction activity subject to this permit includes clearing, grading, and disturbances to the ground such as stockpiling or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility.

The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP should contain a site map(s) which shows the construction site perimeter, existing and proposed buildings, lots, roadways, storm water collection and discharge points, general topography both before and after construction, and drainage patterns across the project. The SWPPP must list BMPs the discharger will use to protect storm water runoff and the placement of those BMPs. Additionally, the SWPPP must contain a visual monitoring program, a chemical monitoring program for non-visible pollutants to be implemented if there is a failure of BMPs, and a sediment monitoring plan if the site discharges directly to a water body listed on the 303(d) list for sediment.

Local

City of Los Angeles General Plan Conservation Element

As detailed in the Conservation Element of the City of Los Angeles General Plan, the element surveys laws, requirements and procedures which have been established for protection of natural resources. It primarily is an informational document which is designed to help readers understand the context, history and opportunities for protection and improvement of the city's natural resources (City of Los Angeles Department of City Planning, 2018a, p. viii).

Northeast Los Angeles Community Plan

The Northeast Los Angeles Community Plan (Community Plan) was established to preserve and enhance the character of Northeast Los Angeles by strengthening the viability and identity of its neighborhoods and communities and to improve the quality of life for its residents within the hills and valleys lying east of the Los Angeles River and north of the Boyle Heights Community Plan area. The Community Plan consists of nine neighborhoods that include Atwater Village, Cypress Park, Eagle Rock, El Sereno, Glassell Park, Highland Park, Lincoln Heights and Montecito Heights, Monterey Hills, and Mount Washington. The Community Plan area serves as a transition between the downtown center of Los Angeles and the neighboring cities of Glendale, Pasadena, South Pasadena and Alhambra to the north and east, as well as the City of Monterey Park and the unincorporated community of City Terrace on the south (City of Los Angeles, 2016).

Los Angeles Municipal Code (LAMC)

The Los Angeles Municipal Code (LAMC) (Sections 12.21, 17.02, 17.05, 17.06, 46.01, and 46.02) includes regulations regarding the relocation, removal, and replacement for City-protected trees. As currently defined in the LAMC, a Protected Tree is any of the following Southern California native tree species which contain a single trunk that measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree: all Southern California native oak trees including Valley Oak (*Quercus lobate*) and California Live Oak (*Quercus agrifolia*), but excluding the Scrub Oak (*Quercus dumosa*); Southern California Black Walnut (*Juglans California* var. *californica*); Western Sycamore (*Platanus racemosa*); and California Bay (*Umbellularia californica*). In 2018, the Department of City Planning recommended to revise the regulations to "Protected Tree and Shrub Regulations" and include two species of shrubs: the Mexican Elderberry (*Sambucus*

mexicana) and Toyon (*Heteromeles arbutifolia*). Protected tree removal requires a removal permit be obtained from the Department of Public Works, Bureau of Street Services, Urban Forestry Division. City policy requires all protected private property trees be replaced on a 4:1 basis in the same location and the removal of three or more trees requires notices and a 30-day public comment period.

4.3.2.2 Existing Conditions

The Project Site is located in the Los Angeles Basin approximately 5.2 miles south of Flint Peak in the Verdugo Mountains. This area is classified by the U.S. Geological Survey as the Los Angeles Plain Ecoregion, which is described as "…on nearly level floodplains and terraces and very gently to gently sloping alluvial fans that include the San Fernando and San Gabriel valleys (Griffith et.al., 2016).

The Project Site is characterized as urban developed with ornamental trees and shrubs throughout. Land uses surrounding the site include residential development to the south and east and natural open space, regional recreational park lands, and equestrian trails to the north and west. The area is characterized by its numerous steep hills and vistas, as well as the Ernest E. Debs Regional Park to the north, which is the fourth largest park in the City of Los Angeles. The regional park contains a mosaic of native vegetation communities such as buckwheat scrub, walnut woodland, and oak woodland. The park also contains many other non-native ornamental trees, shrubs, manicured lawns, and a small community garden.

A literature review and a general biological assessment were conducted within the Project Site and a 500-foot buffer around the Project footprint: together, the Project Site plus the buffer form the biological study area (BSA). Because plants may spread from one site to another and wildlife may inhabit one site but forage, hunt, etc. in another site the BSA is used to assess the potential presence of special-status plant and wildlife species; to identify plant communities; to identify the potential presence of waters of the U.S. or State, USFWS-designated critical habitat, and potential wildlife corridors. Results of the literature review and field surveys are then used to identify potential impacts to biological resources that may result from construction or operation of the Project.

The literature review and field survey methods are described in the BRE for the Rose Hill Courts Project (**Appendix H**) and in **Section 4.3.3** of this EIR. No sensitive plant or wildlife species were observed within the BSA during the field survey (UltraSystems, 2019a). Furthermore, a preliminary tree survey was conducted in December 2016, Jan C. Scow, Arborist, on the Project Site (Scow, 2016) (see the Initial Study in **Appendix B** of this Draft EIR). Based on that survey, no protected native trees or heritage/historic trees were observed within the Project Site.

This section describes the existing conditions within the BSA based on the literature review and biological field survey.

Characteristics

<u>Soils</u>

As discussed in **Section 4.5**, Geology and Soils, the BSA contains four soil map units: Urban Land-Ballona-Typic Xerorthents, Zaca-Apollo warm complex, Counterfeit-Urban Land complex and Counterfeit Nacimiento, warm Urban land association, as depicted in **Figure 4.5-2** (in **Section 4.5** of this EIR). None of the soil map units are listed on the State Soil Data Access (SDA) Hydric Soils List (SDA, 2019) as hydric.

Land Cover Types

This section describes the land cover types present within the BSA as determined by the literature review, field survey, and augmented by examining aerial imagery (Google Earth, 2019). Five different land cover types were observed and mapped within the BSA. Descriptions of vegetation types and habitats within the biological survey areas were based on the dominant perennial species. Generally, classifications of habitat types or vegetation communities were based on Holland's *Preliminary Descriptions of the Terrestrial Communities of California* (Holland, 1986, p. 156) and *A Manual of California Vegetation Second Edition* (Sawyer et al., 2009), with modifications to better represent existing site conditions. The classifications were then checked against California Department of Fish and Wildlife's (CDFW) List of Vegetation Alliances and Associations (or Natural Communities List) (CDFW, 2018a).

A majority of the plant communities identified and mapped within the BSA during the literature review and field survey are not considered sensitive natural communities in local or regional plans, policies, and regulations or by CDFW and USFWS. These plant communities are not considered rare by the California Natural Diversity Database (CNDDB) (CDFW, 2018a); they are dominated by non-native species; they are widespread in the Project Site vicinity; they generally are considered common enough not to be of concern; and/or they exhibit a moderate level of disturbance rendering them less valuable as habitat to support wildlife diversity or special-status species. However, one plant community within the BSA, California walnut woodland, is considered sensitive. California walnut woodland has been designated by NatureServe as a high-risk (G2 and S2.1) natural community. High-risk communities are on the edge of extinction or elimination due to restricted range and in steep declines, or other factors making it very vulnerable to extirpation.

Characteristics of each land cover type feature are described in detail below. Plant species associated with the onsite plant communities are also described. **Table 4.3-1** lists the land cover types with approximate acreages mapped in the Project Site and BSA. **Figure 4.3-1** depicts the location and size of each land cover type.

Table 4.3-1
ACREAGE OF MAPPED LAND COVER TYPES WITHIN THE BSA

Mapped Land Cover Type	Global and State Rank	Total Mapped Acreage within the:	
		BSA	Project Boundary
California buckwheat scrub	G5, S5	0.75	0.00
California walnut woodland	G2, S2.1	0.8	0.00
Developed lands	N/A	25.68	5.24
Ruderal/disturbed habitat	N/A	4.77	0.00
Urban park	N/A	13.93	0.00
	Totals:	**45.78**	**5.24**

Legend and Notes

Notes: The Project boundary acreage is included within the BSA acreage.
Global Rank: the global rank reflects the overall status of an element throughout its global range.

- **G2** = **Imperiled:** At high risk of extinction or elimination due to restricted range. Population often 80 or fewer with recent and widespread declines.

- **G5** = **Secure:** Common; widespread and abundant.

State Rank: the state rank refers to the imperilment status only within California's state boundaries.

- **G2** = **Imperiled:** Imperiled in the state because of rarity due to very restricted range, often 20 or fewer population, steep declines, or other factors making it very vulnerable to extirpation.
- **S5** = **Secure:** Common, widespread, and abundant in the state.

California Buckwheat Scrub

Preliminary Descriptions of the Terrestrial Communities of California (Holland, 1986) classifies this species assemblage as Diegan coastal sage scrub and *A Manual of California Vegetation Second Edition* (Sawyer et al., 2009) classifies this species assemblage among their *Eriogonum fasciculatum* Shrubland Alliance (California buckwheat scrub). California buckwheat scrub has been designated by NatureServe as a secure (G5 and S5) natural community. Secure communities are common, widespread, and abundant in the state. This scrub community is considered low priority for inventory by CDFW and is not considered sensitive.

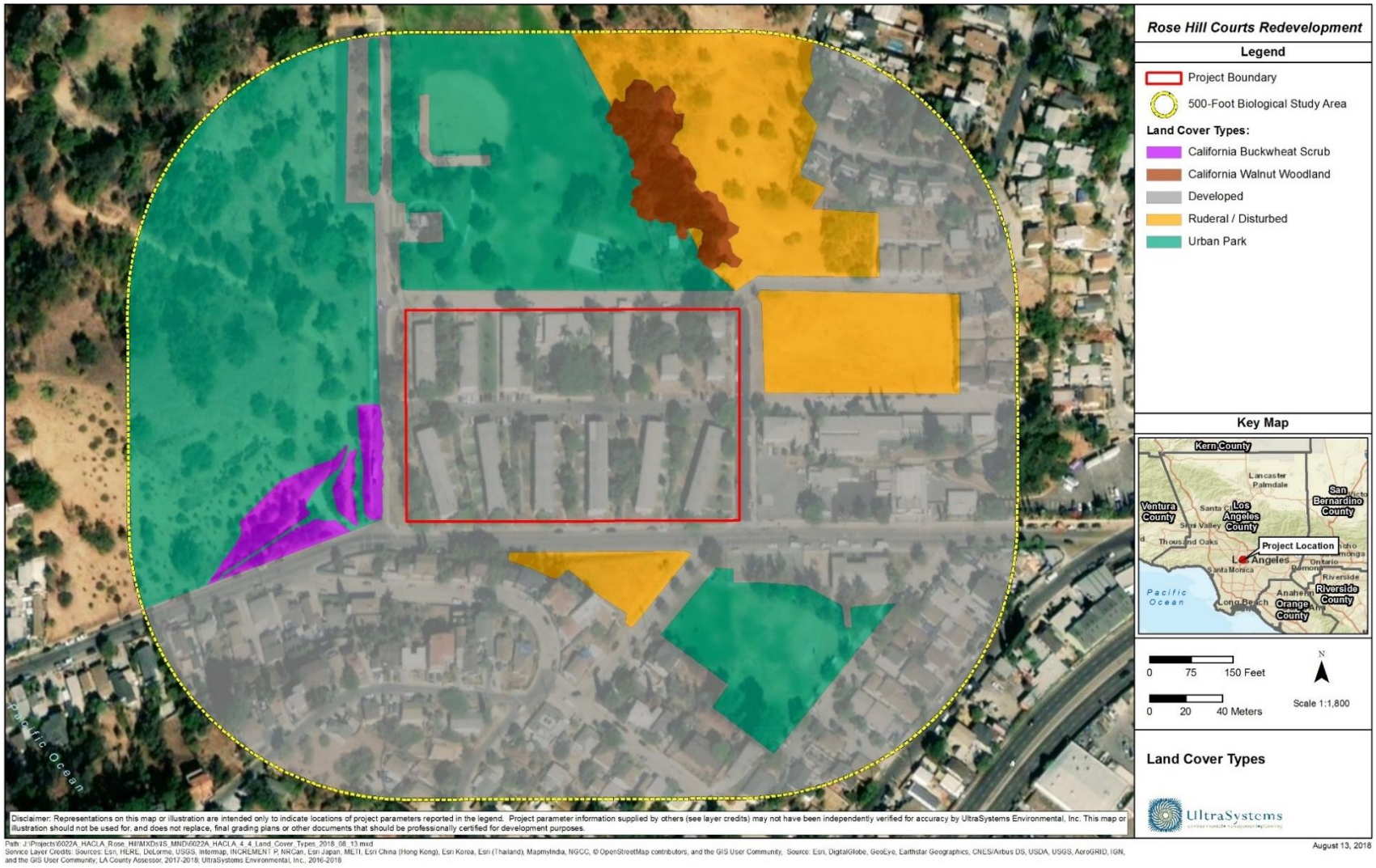
This vegetation community was observed within the BSA west of the Project Site, in the Ernest E. Debs Regional Park Native American Terraced Garden, and separated from the Project Site by Boundary Avenue and Mercury Avenue. This community was dominated by California buckwheat (*Eriogonum fasciculatum*), a native shrub, but it also included laurel sumac (*Malosma laurina*), purple sage (*Salvia leucophylla*) lemonade berry (*Rhus integrifolia*), and sugar bush (*Rhus ovata*).

California Walnut Woodland

The California Walnut Groves Series, as described by Sawyer and Keeler-Wolf (1995), is dominated by the California walnut (*Juglans californica*) with more than 50 present relative cover in the tree canopy or 30 present relative cover with coast live oak (*Quercus agrifolia*), or co-dominant in the tree canopy with white alder (*Alnus rhombifolia*), California ash (*Fraxinus dipetala*), toyon (*Heteromeles arbutifolia*), coast live oak (*Quercus agrifolia*), valley oak (*Quercus lobata*), red willow (*Salix laevigata*), arroyo willow (*Salix lasiolepis*), black elderberry (*Sambucus nigra*), and California bay (*Umbellularia californica*). This series often exists on moist, fine-textured soils of valley slopes and bottoms and rocky outcrops. The floristic composition of this vegetation community matches the walnut woodland described by Holland (1986); this community has a sparse to intermittent shrub layer and sparse to grassy herbaceous layers. The California Walnut Grove Series is typically found on the south side of the San Gabriel Mountains to the Santa Ana Mountains at elevations ranging between 500 and 3,000 feet above mean sea level. California walnut woodland has been designated by NatureServe as a high-risk (G2 and S2.1) natural community. High-risk communities are on the edge of extinction or elimination due to restricted range and in steep declines, or other factors making it very vulnerable to extirpation.

This vegetation community was observed in the BSA north of the Project Site. This community is dominated by California walnuts and coast live oaks and is separated from the Project Site by Florizel Street and the community garden in between the urban park and the ruderal/disturbed area; therefore, this vegetation community would not be affected by the proposed Project.

Figure 4.3-1
LAND COVER TYPES



Developed Lands

Residential properties comprise approximately 56 percent of the BSA and are located in the south, east, and northeast portions of the BSA. Developed lands are either non-vegetated features that are occupied by man-made structures or other impermeable surfaces that cannot support vegetation, or are vegetated by ornamental or landscape vegetation. These developed areas provide virtually no habitat for wildlife species; however, birds could use the ornamental vegetation for foraging and nesting. Developed lands and ornamental vegetation do not have a global or state rank and are not considered sensitive plant communities.

Ruderal/Disturbed Habitat

Ruderal/disturbed habitats contain areas that are heavily to sparsely vegetated by non-native ruderal weedy species or lack vegetation completely. They provide little to no habitat value for wildlife. The ruderal/disturbed habitats observed within the BSA do not fit any classification described in *Preliminary Descriptions of the Terrestrial Communities of California* (Holland, 1986) or *A Manual of California Vegetation Second Edition* (Sawyer et al., 2009). Ruderal/disturbed habitat does not have a global or state rank and is not considered a sensitive plant community. Ruderal vegetation is adapted to frequent disturbances. Ruderal habitats are persistent in California where habitat has been affected by human activities, resulting in a dominance of weedy annual, non-native species (ruderal plants). Ruderal plants can easily colonize areas that are devoid of vegetation. Ruderal habitats can also include remnant patches of native vegetation.

The characteristic ruderal plant species observed within the BSA (north, northeast, and south of the Project Site) include: Russian thistle (=tumbleweed) (*Salsola tragus*), red-stemmed filaree, castor bean (*Ricinus communis)*, and exotic grasses. Despite the presence of native species, the ruderal/disturbed sites are dominated by invasive non-native vegetation. Disturbed habitat refers to bare areas which have little to no vegetation growing on them. These areas contain compacted soils and are generally the result of severe or repeated mechanical perturbation.

Urban Park

This land cover type was observed north and west of the Project Site and consists of the Rose Hill Park ball fields that are within Rose Hill Park. Some of the vegetation found on this land cover type within the BSA consisted of lawn (non-native grass), western sycamore (*Platanus racemosa)*, and oaks (*Quercus sp.*) that were individually scattered within the park; therefore, not identified by its characteristics to be a separate vegetation type. The Park also contains native California walnut woodland and California buckwheat scrub.

Weeds

California Invasive Plant Council (Cal-IPC) is a nonprofit organization that is dedicated to protecting California's lands and waters from ecologically-damaging invasive plants through science, education and policy. It maintains an inventory that categorizes non-native invasive plants that threaten the state's wildlands. Forty of the 63 plant species recorded are non-native. Thirteen of the 40 non-native plant species recorded have a Cal-IPC rating (Cal-IPC, 2006). They are considered highly invasive, competing successfully with – and displacing – native plants. They include the following listed below in **Table 4.3-2**.

Table 4.3-2
RECORDED EXOTIC PLANTS WITH A CAL-IPC RATING

Scientific Name (=Synonym)	Common Name (=Synonym)	Cal-IPC Rating
Ailanthus altissima	Tree of heaven	Moderate
Avena fatua	wild oat	Moderate
Carpobrotus edulis	hottentot fig (=freeway iceplant)	High
Erodium cicutarium	red-stemmed filaree	Limited
Eucalyptus globulus	blue gum eucalyptus	Limited
Ficus carica	edible fig (=common fig)	Moderate
Marrubium vulgare	horehound	Limited
Olea europaea	common olive	Limited
Pennisetum setaceum	fountain grass (=African fountain grass)	Moderate
Ricinus communis	castor bean	Limited
Salsola tragus	Russian thistle (=tumbleweed)	Limited
Schinus molle	Peruvian peppertree	Limited
Washingtonia robusta	Mexican fan palm	Moderate

Ornamental and landscaped vegetation was observed within the BSA during the field survey. Some are considered Cal-IPC species that are highly invasive. However, removal of these non-native species will only be limited within the developed Project Site, and the Project Site is well divided by streets surrounding it; thus, there is little potential for this non-native vegetation to spread to open space and become a nuisance.

4.3.3 Project Impacts

4.3.3.1 Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, the Project would have a significant impact related to biological resources if it would:

Threshold (a): ***Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service; or***

Threshold (b): ***Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service; or***

Threshold (c): ***Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means; or***

Threshold (d): ***Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites; or***

Threshold (e): ***Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or***

Threshold (f): ***Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.***

For this analysis, the Appendix G Thresholds listed above are relied upon.

4.3.3.2 Methodology

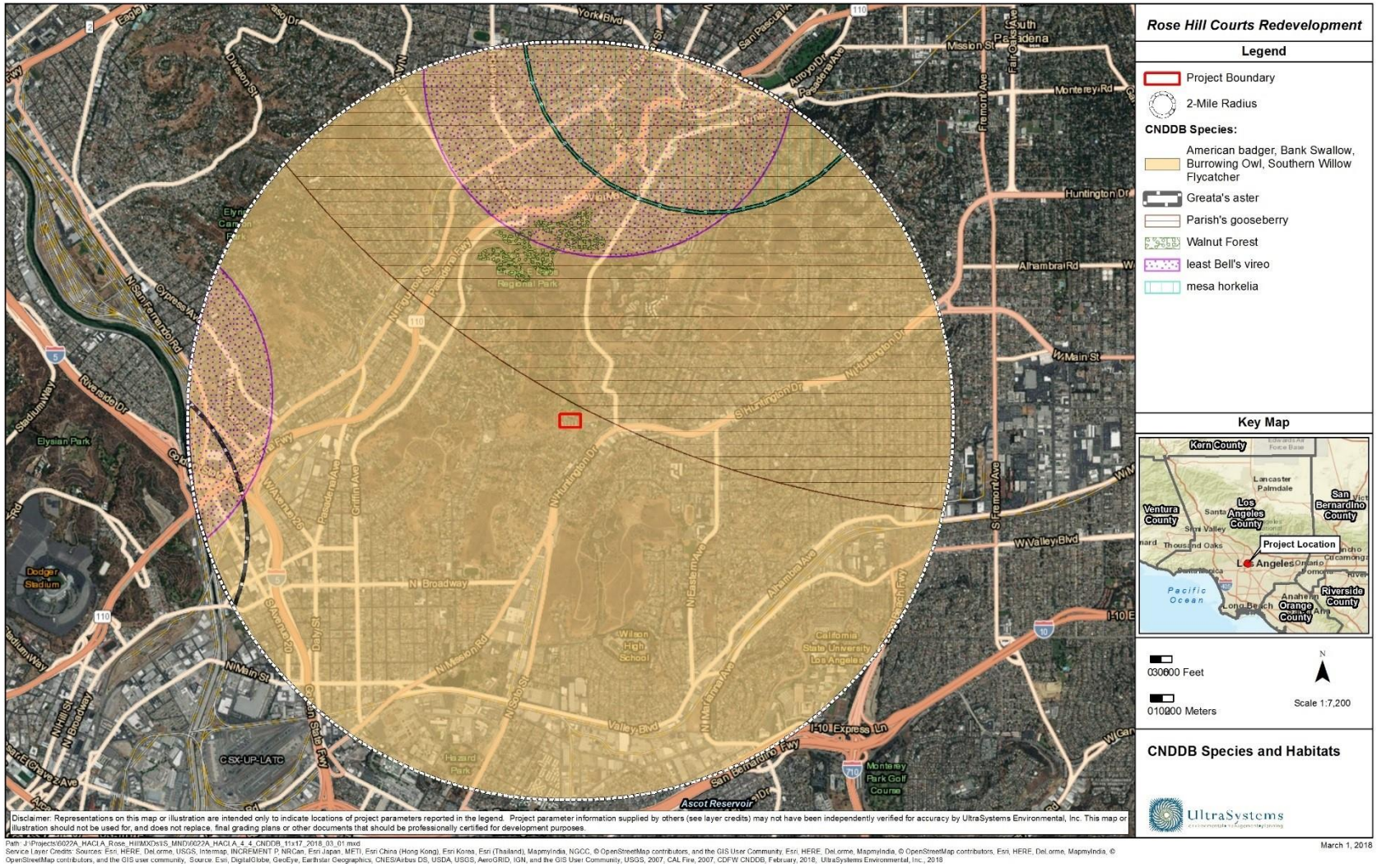
The analysis is based on the preliminary tree survey that was conducted in December 2016 (Scow, 2016), the BRE conducted for the Project in 2018 and the BRE technical report prepared by UltraSystems in March 2019 (UltraSystems, 2019a). The BRE report is included in **Appendix H** of this Draft EIR.

Relevant literature, maps, databases, agency web sites, Geographic Information System (GIS) data, and aerial imagery were obtained to: (1) assess habitats, special-status plant and wildlife species, jurisdictional waters, critical habitats, and wildlife corridors that potentially may occur on and near the Project Site; and (2) identify local or regional plans, policies, and regulations that may apply to the Project (UltraSystems, 2019a).

A reconnaissance-level field survey of the BSA was conducted on May 23, 2018. The purposes of the survey were to evaluate the initial results of the literature review and to collect additional data on baseline site conditions. The general biological surveys covered all accessible areas of the BSA, including the Project Site. Pertinent regional aerial imagery (field maps) of the BSA, and flora and fauna field guides were used to help navigate in the field, assist in identifying habitats and physical features, and assist in identifying and recording special-status species if present. A Global Positioning System (GPS) unit was used to collect locational data to record relevant attributes of features or species encountered. Digital color photographs were also taken in the field to record site conditions at the time of the biological surveys.

Prior to biological field surveys, a search of the CNDDB was conducted and mapped within a two-mile radius of the Project Site to determine which special-status plants and special-status wildlife have the potential to occur in the vicinity of and within the BSA based on distribution and elevation range. See **Figure 4.3-2**.

Figure 4.3-2
CNDDB SPECIES AND HABITATS



The CNDDB search resulted in one sensitive habitat (walnut forest) and three sensitive plant species known to occur within two miles of the Project Site. None of these plant species are listed as endangered or threatened but all are endemic to California. These include:

- mesa horkelia (*Horkelia cuneata* var. *puberula*) (rare in California and considered seriously threatened)
- Parish's gooseberry (*Ribes divaricatum* var. *parishii*) (presumed extirpated or eliminated from California)
- Greata's aster (*Symphyotrichum greatae*) (rare in California and considered not very threatened)

The CNDDB search resulted in six sensitive wildlife species known to occur within two miles of the Project Site. These include:

- southwestern willow flycatcher (*Empidonax traillii extimus*) (Federal- and State-Endangered)
- least Bell's vireo (*Vireo bellii pusillus*) (Federal- and State-Endangered)
- coastal California gnatcatcher (*Polioptila californica*) (Federally Threatened)
- bank swallow (*Riparia riparia*) (State- Threatened)
- burrowing owl (*Athene cunicularia*) (Species of Special Concern)
- American badger (*Taxidea taxus*) (Species of Special Concern)

The USFWS list of threatened and endangered species only included one species, the federally threatened coastal California gnatcatcher, as having the potential to occur in the Project Site or the potential to be affected by the proposed Project.

No federal or state listed endangered, threatened, candidate, or rare plant species were observed within the BSA during the field surveys. Both literature review and field surveys concluded that the species in the plant inventory do not occur within the BSA because the BSA is located outside the plant species' known current distribution, elevation range, and/or the BSA lacks suitable habitats and/or soils to support the plant species.

No sensitive plant species were observed within the BSA during the field surveys. Both literature review and field surveys concluded that the listed sensitive species in the plant inventory do not occur within the BSA because the BSA is located outside the plant species' known current distribution, elevation range, and/or the BSA lacks suitable habitats and/or soils to support the plant species.

Approximately 63 plant species from 36 plant families were observed within the BSA during the biological surveys. None of these observed species were federal or state listed endangered, threatened, candidate, or rare plant species, or otherwise sensitive plants species. A list of the plant species observed during field survey can be found in Attachment C of the BRE.

No federal or state listed Endangered, Threatened, or Candidate wildlife species were observed within the BSA during the field surveys. Similarly, no sensitive wildlife species were observed within the BSA during the field surveys.

The BSA supports a limited assortment of wildlife and provides foraging, nesting, breeding, and cover habitats to amphibians, reptiles, birds (year-round residents, seasonal residents, migrants), and mammals. The number of individual birds and the diversity of bird species observed/detected within

the BSA during the field surveys were low. During the field surveys 21 birds, three mammals, and one reptile species were recorded within the BSA. A list of the wildlife species observed during field survey can be found in **Attachment C of the BRE (included in Appendix H of this DEIR).**

The Project Site and the BSA are not situated on or near any waters of the United States; therefore, a jurisdictional delineation is not required and was not conducted for this Project.

4.3.3.3 Analysis of Project Impacts

Threshold (a): ***Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?***

The Project Site is located in a highly-urbanized setting which provides low habitat value for special-status plant and wildlife species. The literature review and reconnaissance biological survey conducted in May 2018 assessed that the Project Site contains structures, sidewalks, and multiple paved surface areas with impervious surfaces that lacks suitable soils, biological resources, and physical features to support any candidate, sensitive, or special-status plant and animal species. The Special-Status Plants and Wildlife Occurrence Potential table within the BRE (refer to **Appendix H**) also indicates that there is no potential for these special-status species to occur within the Project Site (due to lack of suitable habitat). Additionally, no special-status plants or wildlife were observed within the Project Site during site surveys. A preliminary tree survey was conducted in December 2016 by Jan C. Scow, Arborist, on the grounds of Rose Hill Courts. Five *Quercus suber* (cork oak) were identified onsite, which are not a protected species of oak. There are no protected trees onsite (Scow, 2016). **Therefore, no direct or indirect impacts on special-status plant or animal species would occur as a result of the Project activities.**

Native bird species such as the mourning doves, California towhee (*Melozone crissalis*), house finch (*Haemorhous mexicanus*), etc. are protected by the MBTA (described in **Section 4.3.2.1**), and the California Fish and Game Code which render it unlawful to take native breeding birds, their nests, eggs, and young. The Project Site contains ornamental vegetation and building structures that could potentially provide cover and nesting habitat for common bird species that have adapted to urban areas, such as rock pigeons (*Columba livia*) and mourning doves (*Zenaida macroura).* Indirect impacts on nesting birds could occur from increased noise, vibration, and dust during construction, which could adversely affect the breeding behavior of some birds, and lead to the loss (take) of eggs and chicks, or nest abandonment. The Project would remove all vegetation and demolish building structures currently onsite; as a result, the Project has the potential to impact migratory non-game breeding birds, and their nests, young and eggs. Mitigation is required to reduce potential impacts. **Section 4.3.5** includes mitigation measures to reduce potential impacts regarding Threshold (a) to less than significant.

In compliance with the MBTA (see Section 4.3.2.1, Regulations, Plans, and Standards: Migratory Bird Treaty Act), in vegetation removal, ground disturbance, or any other construction activity is scheduled to begin during the nesting bird season (generally February 1 – August 31), mitigation measures BR-1 and BR-2 (refer to Section 4.3.5) would be implemented, and impacts on nesting bird species protected by the MBTA would be less than significant.

With the implementation of mitigation measures BR-1 and BR-2 in Section 4.3.5, potential impacts on biological resources would be reduced to less than significant levels.

Threshold (b): ***Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?***

As discussed in the Initial Study prepared for the Project, included as **Appendix B** of this Draft EIR, the dominant land use in the Project vicinity is developed and urban park which includes structures, paving, and other impervious surfaces and or areas where landscaping has been installed and maintained. Both the literature review and results of the reconnaissance-level field survey, conducted in May 2018, indicate that riparian habitat or other sensitive natural communities do not exist on or adjacent to the Project Site. For this reason, no direct or indirect impacts to riparian habitat or other sensitive natural communities are anticipated as a result of the Project, and as such, the Project would have no impact **with respect to Threshold (b). Therefore, no impact would occur and no further analysis is required.**

Threshold (c): ***Would the Project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?***

As discussed in the Initial Study prepared for the Project, included as **Appendix B** of this Draft EIR, no wetlands occur in or adjacent to the Project Site. For this reason, no direct or indirect impacts to federally protected wetlands as defined by § 404 of the Clean Water Act (CWA) are anticipated through direct removal, filling, hydrological interruption, or other means, as a result of Project activities, and therefore, no impacts would result. The Project would have no impact **with respect to Threshold (c). Therefore, no impact would occur and no further analysis is required.**

Threshold (d): ***Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?***

As discussed in the Initial Study prepared for the Project, included as **Appendix B** of this Draft EIR, the Project Site and surrounding areas do not support resident or migratory fish species or wildlife nursery sites. No established resident or migratory wildlife corridors occur on the Project Site or in the surrounding areas. As a result, the Project would not interfere substantially with or impede: (1) the movement of any resident or migratory fish or wildlife species, (2) established resident or migratory wildlife corridors, or (3) the use of wildlife nursery sites. Therefore, there would be no impacts **with respect to Threshold (d). Therefore, no impact would occur and no further analysis is required.**

Threshold (e): ***Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?***

As discussed in the Initial Study prepared for the Project, included as **Appendix B** of this Draft EIR, the Project Site is located in a developed area, and there were not any native trees or shrubs protected by local policies or ordinances observed on the Project Site during the reconnaissance-level field

survey. The Project would not conflict with local policies or ordinances protecting biological resources and therefore would not result in any impacts. There are no protected trees onsite. There would be no impact **with respect to Threshold (e). Therefore, no impact would occur and no further analysis is required.**

Threshold (f): ***Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?***

As discussed in the Initial Study prepared for the Project, included as **Appendix B** of this Draft EIR, the Project Site is not located in a Habitat Conservation Plan (HCP), Natural Communities Conservation Plan (NCCP), or another approved HCP area. For this reason, the Project would not conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state HCP and therefore, no impacts would result. The Project would have no impact **with respect to Threshold (f). Therefore, no impact would occur and no further analysis is required.**

4.3.4 Cumulative Impacts

The Project Site is located in a highly-urbanized setting which provides low habitat value for special-status plant and wildlife species. The literature review and reconnaissance biological survey conducted in May 2018 assessed that the Project Site contains structures, sidewalks, and multiple paved surface areas with impervious surfaces that lacks suitable soils, biological resources, and physical features to support any candidate, sensitive, or special-status plant and animal species. The Project has the potential to impact migratory non-game breeding birds, and their nests, young and eggs. With implementation of mitigation measures **BR-1** and **BR-2** (refer to **Section 4.3.5**), potential impacts would be reduced to less than significant levels. **After implementation of mitigation, cumulative impacts on nesting birds would be less than significant.**

4.3.5 Mitigation Measures

As analyzed above in Threshold (a), indirect impacts on nesting birds could occur from increased noise, vibration, and dust during construction, which could adversely affect the breeding behavior of some birds, and lead to the loss (take) of eggs and chicks, or nest abandonment. The Project has the potential to impact migratory non-game breeding birds, and their nests, young and eggs. Therefore, the following measures are provided to reduce the construction-related impacts to migratory non-game breeding birds, their nests, young and eggs:

BR-1: Nesting Bird Surveys

If Project activities begin during nesting bird season (generally February 1 – August 31), no earlier than one week prior to ground-disturbing activities, a qualified biologist shall conduct preconstruction nesting bird clearance surveys within the Project Site and within a 100-foot buffer around the Project Site for nesting birds, and other sensitive species.

To maintain compliance with the Migratory Bird Treaty Act and California Fish and Game Code, and to avoid or minimize direct and indirect effects on migratory non-game nesting birds, and their nests, young, and eggs, the following measures shall be implemented.

- Project activities that will remove or disturb potential nest sites should be scheduled outside the nesting bird season, if feasible. The nesting bird nesting season is typically from

February 1 through August 31, but can vary slightly from year to year, usually depending on weather conditions. Raptors are known to begin nesting early in the year and ends late. The raptor nesting bird season begins January 1 to September 15.

- If Project activities that will remove or disturb potential nest sites cannot be avoided during February 1 through August 31, a qualified biologist shall conduct a pre-construction survey for nesting birds within the limits of Project disturbance up to seven days prior to mobilization, staging and other disturbances. Preconstruction surveys shall be conducted no more than three days prior to vegetation, substrate, and structure removal and/or disturbance.

- If neither nesting birds nor active nests are observed during the pre-construction survey(s), or if they are observed and will not be affected (i.e. outside the buffer zone described below), then Project activities may begin and no further nesting bird monitoring will be required.

- If an active bird nest is located during the pre-construction survey and will potentially be affected, a no-activity buffer zone shall be delineated on maps and marked in the field by fencing, stakes, flagging, or other means up to 500 feet for raptors, or 100 feet for non-raptors. Materials used to demarcate the nests will be removed as soon as work is complete or the fledglings have left the nest. The biologist will determine the appropriate size of the buffer zone based on the type of activities planned near the nest and bird species. Buffer zones shall not be disturbed until a qualified biologist determines that the nest is inactive, the young have fledged, the young are no longer being fed by the parents, the young have left the area, or the young will no longer be affected by Project activities. Periodic monitoring by a biologist will be performed to determine when nesting is complete. After the nesting cycle is complete, Project activities may begin within the buffer zone.

BR-2: Biological Monitor

- The applicant shall retain a qualified Biological Monitor to conduct pre-construction surveys and biological monitoring during construction. If special-status wildlife species or protected nesting birds are observed and determined present within the BSA during the pre-construction breeding bird surveys, then the qualified biological monitor shall be onsite to monitor throughout the duration of construction activities that result in tree or vegetation removal, to minimize the likelihood of inadvertent impacts on nesting birds and other wildlife species. Monitoring shall also be conducted periodically during construction activities to ensure no new nests occur during vegetation removal or building demolition activities between February 1 through August 31. The biological monitor shall ensure that biological mitigation measures, best management practices, avoidance, and protection measures and mitigation measures described in the relevant project permits and reports are in place and are adhered to.

- The Biological Monitor shall have the authority to halt all construction activities and all non-emergency actions if sensitive species and/or nesting birds are identified and would be directly impacted. The monitor will notify the appropriate resource agency and consult if needed. If necessary, the monitoring biologist shall relocate the individual outside of the work area where it will not be harmed. Work can continue at the location if the applicant and the consulted resource agency determine that the activity will not result in impacts on the species.

- The appropriate agencies shall be notified if a dead or injured protected species is located within the Project Site. Written notification shall be made within 15 days of the date and time of the finding or incident (if known) and must include: location of the carcass, a photograph, cause of death (if known), and other pertinent information.

4.3.6 Level of Significance after Mitigation

Mitigation measures **BR-1** and **BR-2** would reduce the potential indirect impacts on nesting birds and their young from increased noise, vibration, and dust during construction. The Project has the potential to impact migratory non-game breeding birds, and their nests, young and eggs. Mitigation measures **BR-1** and **BR-2** would reduce **potential impacts on biological resources to a less than significant level.**

4.4 Cultural Resources

4.4.1 Introduction

This section provides an overview of cultural resources that may be present within the study area. Cultural resources are artifacts of human activity, occupation, or use (see **Appendix I1** for UltraSystems' cultural resources report). They include expressions of human culture and history in the physical environment, such as archaeological sites, historic buildings and structures, or other culturally significant places. This section also provides an analysis of the Projects potential impacts on historic resources that could result from development of the proposed Project. The analysis is based on investigations of the Project Site by cultural resources and historical resources specialists. This section is based on record searches and other investigation methods provided in **Appendix I1** (Phase I Cultural Resources Survey) and **Appendix L** (Historical Resource Technical Report).

Historic buildings and structures generally must be 50 years or older and are typically identified through archival and library research, followed by field reconnaissance and recordation. Historic buildings and structures are architecturally, historically, or artistically important individual and groups of residential, commercial, industrial, and transportation properties.

Archaeological resources refer to surface or buried material remains, buried structures, or other items used or modified by people. Prehistoric archaeological resources predate European presence in Los Angeles, and can include villages or campsites, food remains, basketry fragments, shell and stone tools and tool-making debris. Ethnohistoric or protohistoric archaeological resources are those that can be attributed to native cultures, but include evidence of European contact, such as trade beads in a site that otherwise appears to be prehistoric. Historic archaeological sites are those deposits that post-date European contact.

Traditional cultural properties (TCPs) are places associated with the cultural practices or beliefs of a living community. The significance of these places is derived from the role the property plays in a community's cultural identity, as defined by its beliefs, practices, history, and social institutions. Examples include natural landscape features, plant gathering places, sacred sites, and Native American burial locations.

4.4.2 Environmental Setting

4.4.2.1 Regulatory Framework

The treatment of cultural resources is governed by federal, state, and local laws and guidelines. There are specific criteria for determining whether prehistoric sites or objects are significant and thus protected by law. Federal and state significance criteria generally focus on the integrity and uniqueness of the resource, its relationship to similar resources, and its potential to contribute information important to scholarly research. Some resources that do not meet federal significance criteria may be considered significant by state criteria. The laws and regulations seek to mitigate Project impacts on significant prehistoric and historical-period resources.

Federal

National Historic Preservation Act (NHPA) of 1966

The NHPA of 1966 authorized the NRHP and coordinates public and private efforts to identify, evaluate, and protect the Nation's historic and archaeological resources. The NRHP includes districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture. Section 106 (Protection of Historic Properties) of the NHPA requires federal agencies to take into account the effects of projects on historic properties.

National Register of Historic Places

The National Register is "an authoritative guide to be used by Federal, State, and local governments, private groups and citizens to identify the Nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment." (Title 36 Code of Federal Regulations, Part 60.2)

Criteria

The National Historic Preservation Act, enacted in 1966, established the National Register of Historic Places program under the Secretary of the Interior. The National Register established four criteria to evaluate significance and eligibility for listing. They are:

11. Property is associated with events that have made a significant contribution to the broad patterns of our history.

12. Property is associated with the lives of persons significant in our past.

13. Property embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components lack individual distinction.

14. Property has yielded, or is likely to yield, information important in prehistory or history. (City of Los Angeles Office of Historic Resources, 2019a).

Context

To qualify for the National Register, "a property must be significant; that is, it must represent a significant part of the history, architecture, archaeology, engineering, or culture of an area, and it must have the characteristics that make it a good representative of properties associated with that aspect of the past."(National Register Bulletin #15, 1997, p. 7). Additionally, National Register Bulletin #15 states that the significance of a historic property can be judged and explained only when it is evaluated within its historic context. The Bulletin defines Historic contexts as: "…historical patterns that can be identified through consideration of the history of the property and the history of the surrounding area" (National Register Bulletin #15, 1997. p. 7).

Integrity

In addition to context, a property must have integrity, which is defined as: "…the ability of a property to convey its significance" (National Register Bulletin #15, 1997. p. 44). The seven aspects of integrity include; location, design, setting, materials, workmanship, feeling, and association. "To retain historic integrity a property will always possess several, and usually most, of the aspects" (National Register Bulletin #15, 1997. p. 44).

Historic Districts

A Historic District *"…possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development. A district derives its importance from being a unified entity, even though it is often composed of a wide variety of resources. The identity of a district results from the interrelationship of its resources, which can convey a visual sense of the overall historic environment or be an arrangement of historically or functionally related properties"* (National Register Bulletin #15, 1997, p. 5).

As detailed in Title 36 of the Code of Federal Regulations Part 60.3(d): A District is a geographically definable area, urban or rural, possessing a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united by past events or aesthetically by plan or physical development. A district may also comprise individual elements separated geographically but linked by association or history.

State

<u>California Register of Historical Resources (Public Resource Code § 5024.10 et seq.)</u>

State law protects cultural resources by requiring evaluations of the significance of historical resources in CEQA documents. A cultural resource is an important historical resource if it meets any of the criteria found in § 15064.5(a) of the *State CEQA Guidelines*. These criteria are similar to those used in federal law. The California Register of Historical Resources (CRHR) is maintained by the state Office of Historic Preservation. Properties listed, or formally designated eligible for listing, on the NRHP are automatically listed on the CRHR, as are state historical landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

As detailed in Public Resources Code § 5024.1, the California Register is an authoritative guide in California to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change.

For purposes of CEQA, a historical resource is any object, building, structure, site, area, place, record, or manuscript listed in or eligible for listing in the CRHR (PRC § 21084.1). A resource is eligible for listing in the CRHR if it meets any of the following criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

2. Is associated with the lives of persons important in our past;

3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values;

4. Has yielded, or may be likely to yield, information important in prehistory or history.

Properties formally determined eligible for the NRHP are automatically listed in the CRHR.

The California Code of Regulations (CCR) further provides that cultural resources of local significance are CRHR-eligible (Title 14 CCR, § 4852).

California Environmental Quality Act (CEQA)

CEQA requires the lead agency to consider whether the Project will have a significant effect on unique archaeological resources and to avoid unique archaeological resources when feasible or mitigate any effects to less-than-significant levels per California Public Resources Code (PRC) § 21083.2. CEQA (PRC § 21083.2(g)) defines a unique archaeological resource as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.

2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.

3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

CEQA Guidelines (Title 14 of the California Code of Regulations § 15064.5) states that historical resources include:

1. A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Public Resources Code § 5024.1, Title 14 CCR, Section 4850 et seq.);

2. A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements of section 5024.1(g) of the Public Resources Code; and

3. Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historic resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record.

The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources, or identified

in an historical resources survey does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code §§ 5020.12(j) or 5024.1.

A significant impact would occur under CEQA if the Project results in a substantial adverse change in the significance of a historical resource as defined in § 15064.5(a). A substantial adverse change in the significance of a historical resource, per CEQA Guidelines, means: "…physical demolition, destruction, relocation, or alternation of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired. "

The significance of an historical resource is materially impaired when a project:

(A) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resources that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or

(B) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

(C) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA

Section 15064.5(b)(3) of CEQA states that: "*Generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historical resource*."

Local

<u>City of Los Angeles General Plan</u>

The "Conservation Element of the City of Los Angeles General Plan" (2018a; adopted and approved, 2001), Section 5 covers "Cultural and Historical" elements (2018a:II-3 to II-6), concerned with the modern aspects of the City's heritage, which dates from the establishment of the pueblo in 1781 to recent times. It states that procedures "to identify, protect and preserve historic sites and structures for the enrichment of future generations" have been established. There are five types of historic designations: (1) Historic-Cultural Monument; (2) placement on the California Register of Historic Resources; (3) placement on the NRHP; (4) designation of significance by the Community Redevelopment Agency; and (5) classification by the City Council as an Historic Preservation Overlay Zone. Under the City's CEQA guidelines, structures that fall into any of these five categories must undergo an environmental assessment.

The Conservation Element also deals with "Archaeological and Paleontological" resources in Section 3 (2018a:II-3 to II-6). The presence and importance of pre-historic and historic archaeological sites within the City is acknowledged. It states that various federal, state and local regulations protect archaeological sites and resources apply to the City of Los Angeles (2018a:II-3), among which are the Archaeological Resources Protection Act, the Native American Graves and Repatriation Act and the Native American Heritage Act provide guideline for the protection of Native American artifacts and remains. The General Plan also notes that various California Government Codes, and several provisions of the CEQA, also provide guidelines for the protection and identification of archaeological sites and artifacts as a part of local development permits.

The City's General Plan notes that the City is rich in paleontological resources, and goes on to describe the CEQA requirements for excavations if significant paleontological resources are found at a development project.

Though the General Plan states that "the city has a primary responsibility in protecting significant archaeological and paleontological resources," the Plan does not provide its own regulations for the protection and preservation of prehistoric cultural resources.

The Rose Hill Courts were determined eligible for the National Register of Historic Places, which placed it on the CRHR (see discussion below), and the potential impacts and mitigation for these are discussed in **Section 4.4.3**. The potential for impacts under CEQA to archaeological sites, Native American remains are also discussed in **Section 4.4.3** below, and paleontological resources are discussed in **Section 4.5**, Geology and Soils.

City of Los Angeles Cultural Heritage Ordinance

The Cultural Heritage Ordinance (No. 185472) was initially adopted by the Los Angeles City Council in 1962 and was last updated in 2018 (City of Los Angeles Cultural Heritage Ordinance, 2018, p. 11). This Ordinance defines the procedures for the Cultural Heritage Commission and Historic-Cultural Monument designations (City of Los Angeles Office of Historic Resources, 2019b). The purpose of the Cultural Heritage Commission is to perform functions relating to historic and cultural preservation of sites, buildings, or structures that embody the heritage, history, and culture of the City (City of Los Angeles Cultural Heritage Ordinance, 2018, p. 1). A proposed Monument may be designated by the City Council upon the recommendation of the Commission if it meets at least one of the following criteria (City of Los Angeles Cultural Heritage Ordinance, 2018, p. 2-3):

1. Is identified with important events of national, state, or local history, or exemplifies significant contributions to the broad cultural, economic, or social history of the nation, state, city of community;

2. Is associated with the lives of historic personages important to national, state, city, or local history; or

3. Embodies the distinctive characteristic of a style, type, period, or method of construction; or represents a notable work of a master designer, building, or architect whose individual genius influenced his or her age.

Section 91.106.4.4 of the City of Los Angeles Municipal Code states:

"The department shall not issue a permit to demolish, alter or remove a building or structure of historical, archaeological or architectural consequence if such building or structure has been officially designated, or has been determined by state or federal action to be eligible for designation, on the National Register of Historic Places, or has been included on the City of Los Angeles list of historic cultural monuments, without the department having first determined whether the demolition, alteration or removal may result in the loss of or serious damage to a significant historical or cultural asset. If the department determines that such loss or damage may occur, the applicant shall file an application and pay all fees for the California Environmental Quality Act Initial Study and Check List, as specified in Section 19.05 of the Los Angeles Municipal Code. If the Initial Study and Check List identifies the historical or cultural asset as significant, the permit shall not be issued without the department first finding that specific economic, social or other considerations make infeasible the preservation of the building or structure" (City of Los Angeles Municipal Code, 2019).

The Rose Hill Courts were determined eligible for the National Register of Historic Places, which placed it on the CRHR (see discussion below). The potential impacts and mitigation for these are discussed in **Section 4.4.3**.

City of Los Angeles Historic Preservation Overlay Zone Ordinance

City of Los Angeles Ordinance Number 184903, in Section 12.20.3 of the Los Angeles Municipal Code, describes the procedures for creation of new Historic Preservation Overlay Zones (HPOZs), the powers and duties of HPOZ Boards, and the review processes for projects within HPOZs (City of Los Angeles Ordinance No. 184903, 2019). The Ordinance was adopted by the Los Angeles City Council on April 25, 2017, and became effective on June17, 2017 (City of Los Angeles Office of Historic Resources, 2019c).

City of Los Angeles Historic Resources Survey

The Los Angeles Historic Resources Survey, referred to as SurveyLA, was conducted to identify and document significant historic resources. The field surveys, now complete, covered the entire city of Los Angeles -- over 880,000 legal parcels within almost 500 square miles. The survey was managed by the City of Los Angeles Department of City Planning's Office of Historic Resources. As detailed on the SurveyLA website: *"The surveys covered the period from approximately 1850 to 1980 and included individual resources such as buildings, structures, objects, natural features and cultural landscapes as well as areas and districts (archaeological resources will be included in a future survey phase) Significant resources reflect important themes in the city's growth and development in various areas including architecture, city planning, social history, ethnic heritage, politics, industry, transportation, commerce, entertainment, and others. Field surveys, conducted from 2010-2017, were completed in three phases by Community Plan Area "*(SurveyLA, 2019a).

As detailed in the SurveyLA Field Survey Results Master Report, *"The surveys identify and evaluate properties according to standardized criteria for listing in the National Register of Historic Places, California Register of Historical Resources, and for local designation as City Historic-Cultural Monuments (HCMs) and Historic Preservation Overlay Zones…SurveyLA findings are subject to updates over time as properties age, additional information is uncovered, and more detailed research and analyses are completed. Resources identified through SurveyLA are not designated resources. Designation by the City of Los Angeles and nominations to the California or National Registers are separate processes which include property owner notification and public hearings*" (SurveyLA, 2019b, p. 1).

The Rose Hill Courts were determined eligible for the National Register of Historic Places, which placed it on the CRHR (see discussion below). The potential impacts and mitigation for these are discussed in Section 4.4.3.

Northeast Los Angeles Community Plan

The City of Los Angeles' "Northeast Los Angeles Community Plan Revision" (2016; adopted June, 1999), provides recommendations for the "Preservation of Historic and Cultural Amenities" (2016:III-31 to III-33). It recommends policies to establish Historic Preservation Overlay Zones to help preserve and restore monuments, cultural resources, neighborhoods and landmarks which have historical and/or cultural significance, as well as to enhance and capitalize on the contribution of existing cultural and historic resources within the community.

The Northeast Los Angeles Community Plan calls for the preservation and maintenance of sites and structures which have been deemed culturally and/or historically significant designated thus by listing on the City of Los Angeles Historic and Cultural Monuments, as designated by the Los Angeles City Council. Rose Hill Courts would fall within the Streamline Modern (1930-1941) phase of architectural evolution listed within the Plan (2016:III-31).

There is no acknowledgement of, or recommendations for, treatment or preservation within the Northeast Los Angeles Community Plan of prehistoric archaeological cultural resources or of paleontological resources that might exist with the Northeast Los Angeles Community.

The Rose Hill Courts are listed on the CRHR (see discussion below). The potential impacts and mitigation for the Project Site are discussed in **Section 4.4.3**.

Human Remains

According to § 15064.5 of the *State CEQA Guidelines*, all human remains are a significant resource. § 15064.5 of the *State CEQA Guidelines* also assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. These procedures are discussed within PRC § 5097. Per PRC § 5.97.98(a): Whenever the commission receives notification of a discovery of Native American human remains from a county coroner pursuant to subdivision (c) of § 7050.5 of the Health and Safety Code, it shall immediately notify those persons it believes to be most likely descended from the deceased Native American. The decedents may, with the permission of the owner of the land, or his or her authorized representative, inspect the site of the discovery of the Native American remains and may recommend to the owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The descendants shall complete their inspection and make their recommendation within 24 hours of their notification by the Native American Heritage Commission. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials.

California Public Resources Code § 5097.98

California Senate Bill 297 (1982) addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and establishes the Native American Heritage

Commission to resolve disputes regarding the disposition of such remains. It has been incorporated into § 15064.5(e) of the *State CEQA Guidelines*.

California Health and Safety Code

The California Health and Safety Code § 7050.5 states that if human remains are discovered during construction on a project's site, no further disturbance shall occur until a county coroner makes a determination of origin and disposition of the remains. If the county coroner determines the remains are not subject to his or her authority and recognizes the remains to be those of Native American, the county coroner must contact the Native American Heritage Commission within 24 hours.

4.4.2.2 Existing Conditions

Natural Setting

The Project lies within the City of Los Angeles, Los Angeles County, in southern coastal California. Los Angeles is located on a hilly coastal plain with the Pacific Ocean as its southern and western boundaries. The city stretches north to the foothills of the Santa Monica Mountains and is bounded by the San Gabriel Mountains to the east. Numerous valleys, hills, coastlines and riverbeds characterize the region, making it an area of diverse micro-climates.

The predominant weather influence in the Los Angeles area is the warm, moist Pacific air, keeping temperatures mild throughout the year. Summers are dry and sunny with most of the precipitation falling during winter, receiving on average 17 inches of rain per year. The city is quite large, covering 469 square miles including a portion of the western Mojave Desert and the San Gabriel Mountains, but still averages only about 340 feet above mean sea level.

Prior to urbanization, creeks flowed across the Los Angeles Basin (better identified as a plain) from the San Gabriel Mountains to the ocean with little hindrance. These water courses often meandered across the plain to different physical locations over time. The Los Angeles Basin situated behind the coast was, in the preindustrial era, primarily grassland and coastal scrub brush. In the past, the several rivers and large creeks contained riparian habitat as well as estuaries at their ocean exits.

The City of Los Angeles today is the second most populous community in the United States (second only to New York City) and is home to about 3,976,000 people (2016 estimate). The Northeast Los Angeles Community area contains a population of 167,674 (2000 census), while the El Sereno neighborhood itself is the home to 43,766 as of the 2000 census. This community rests in the San Rafael Hills northeast of downtown Los Angeles, which range in height from 400 to 1,788 feet. Rose Hills Court itself lies at an elevation of approximately 480 to 520 feet, sloping to the east, and is just over three and a half miles northeast of the Los Angeles City Hall. The Project Site is bounded by Mercury and McKenzie Avenues that contain single and multiple family residences, and Our Lady of Guadalupe Roman Catholic Church and elementary school. Across Florizel Street and Boundary Avenue to the west and north is the semi-developed Ernest E. Debs Regional Park.

Project Site - Architectural Setting

The Rose Hills Court was formally determined eligible for the NRHP and is therefore listed in the CRHR. Located in the community of El Sereno in northeast Los Angeles, the five-acre Project Site is rectangular in shape and is bounded by East Florizel Street on the north, North McKenzie Avenue on the east, East Mercury Avenue on the south, and North Boundary Avenue on the west. The property

is bisected on an east-west axis by Victorine , a private driveway, creating a north and a south block. The property is on a slope: the northwest end of the Project Site is the highest point and the southeast end of the Project Site is the lowest point. The Project Site is surrounded by Rose Hill Park on the north and Ernest E. Debs Regional Park to the north and west. Southeast of the Project Site is Our Lady of Guadalupe Catholic Church and School, and the Rose Hill Recreation Center. The general vicinity is characterized by single-family and multi-family residential development. The landscaping on the site consists of grassy open areas with mature trees and shrubs, as well as concrete planters.

The Rose Hill Courts is a public housing complex composed of 15 structures. These include an administration building and 14 apartment buildings containing 100 dwelling units. The buildings are rectangular or square in plan and are generally arranged in parallel groupings. The north block includes the administration building facing Florizel Street. To the west of the administration building there are three rectangular apartment buildings, and to the east are one rectangular and four-square apartment buildings. The south block includes six rectangular apartment buildings. Parking for the complex consists of surface spaces situated in a paved area along Victorine.

There are five building types on the site. All of the buildings are one or two stories in height, with wood-frame construction, concrete slab foundations, and composition roofing. **Table 4.4-1** ("Building Types") below lists the types of buildings, the number of each building type, and how many residential units in each type.

Table 4.4-1
BUILDING TYPES

BUILDING TYPES		
Building Type	**Number of Building Type**	**Number of Units in Type**
A	2	10
B	1	6
C	6	10
D	4	2
E	1	6

Designed in the modern style typical of public housing complexes of the period, the apartment buildings generally have low-pitched side gable roofs with slightly overhanging eaves and exposed rafter tails. The roofs were originally covered with tar and gravel, but are now covered with a rolled composition material. Exterior walls are sheathed with stucco. Front and rear entrances are typically situated in pairs and feature a shared concrete stoop sheltered by a non-original flared mansard hood; originally the hoods were flat. The doors have been replaced throughout and metal security doors have been installed. The stoops are surrounded by simple metal railings. The fenestration consists of original steel multi-paned casement windows throughout all of the buildings, except one which has had windows replaced. Window openings are generally stacked vertically.

Building Types (See **Figure 4.4-2** below)***:***

Building Type A

This building type is two stories; because of the slope on the site, the first story is partially below-grade. Building Type A consists of ten one-room apartments—five on the first story and five on the second story. The roof on Type A is side-gabled and the exterior walls are unarticulated. The front of the building is characterized by paired entrances on single stoops; at the rear of the building, there is just one entrance per stoop. There are two of this building type on the property, located in the northwest corner. They are separated by a planted area with mature trees, succulents, and shrubs.

Building Type B

This building type is the only residential building that is one story in height. Building Type B consists of six, one-bedroom apartments. The roof on Type B is a sloping shed roof and the exterior walls are unarticulated. The front and rear of the building appear very similar; however, at the rear of the building, there are small concrete areas with clotheslines for each apartment. There are concrete walkways that lead to each entrance, terminating in a set of shallow concrete steps with a metal handrail. There is one of this building type on the property. It is located directly west of the administration building.

Building Type C

This building type is two stories in height. Building Type C consists of eight, two-bedroom apartments and two, three-bedroom apartments. The three-bedroom apartments are on the north and south ends of the building. The roof on Type C is side-gabled, and the second story has a slight overhang over the first. The front of the building is characterized by paired entrances on single stoops; at the rear of the building, there is just one entrance per stoop for each unit. There are six of this building type on the property. They are arranged symmetrically on the south block. Planters with mature trees, succulents, and shrubs separate the buildings.

Building Type D

This building type is two stories. Building Type D consists of two, three-bedroom apartments. The roof on Type D is side-gabled and the second story has a slight overhang over the first. The front of the building is characterized by paired entrances on single stoops; at the rear of the building, there is just one entrance per stoop for each unit. There are four of this building type on the site. They are arranged symmetrically in the northeastern portion of the site.

Building Type E

This building type is two stories. Building Type E consists of four, four-bedroom apartments and two, one-bedroom apartments. The roof on Type E is side-gabled and the exterior walls are unarticulated. The front and rear of the building appear very similar; however, at the rear of the building, there are small concrete areas with clotheslines for each residential unit. There is one of this building type on the property.

Administration Building

The administration building is centered on the north block, with a street address of 4466 Florizel. The primary elevation faces north towards Florizel Street. It is generally rectangular in plan and has a cross-gabled, composition roof with open eaves and exposed rafters. The exterior is clad in smooth stucco. The windows are multi-light steel casements with metal security bars installed on the exterior. The primary entrance is centered on the north elevation and consists of a pair of metal slab doors. The entrance is accessed by a set of concrete steps and a concrete handicap-accessible ramp that were constructed at an unknown date. On the east elevation, there is a secondary entrance that consists of a single metal slab door. The secondary entrance is accessed by a set of concrete steps. On the west elevation, there is a concrete block enclosure for maintenance equipment and vehicles. On the south elevation, there is a rear entrance that consists of a pair of metal slab doors. The entrance is accessed by a set of concrete steps. All of the metal slab doors are non-original. South of the building there is a children's playground area, concrete picnic tables and outdoor grills. Inside the administration building there are offices, and a common room with a kitchen, pantry, and two bathrooms.

Figure 4.4-2
BUILDING TYPES AT ROSE HILL COURTS

Figure 2: Building Types on the Site (GPA)

Past alterations to the property include the replacement of the hoods above the entrances, the replacement of the windows in one apartment building on the south block, and the construction of a handicap access ramp on the administration building. Further alterations that have taken place include the replacement of doors on the front and rear elevations of the administration building. Originally, these doors were partially-glazed and presumably wood; they were replaced with metal slab doors at an unknown date for security reasons. A portion of the original maintenance yard was enclosed for a building addition at the southwest corner at an unknown date. The original wood-paneled doors in the apartment buildings have been replaced with metal slab doors and metal security doors were installed as well. History and Description of Rose Hill Courts

(The following history and description of Rose Hill Courts is derived from the Historical Resources Report prepared by GPA Consulting, 2018 [**Appendix L**].)

Archaeological Setting

Prehistoric Overview

The term "prehistoric period" refers to the period of pre-contact Native California lifeways and traditions prior to the arrival of Euroamericans.

It is widely acknowledged that human occupation in the Americas began about 13,000 or more years ago (all dates presented here are calibrated radiocarbon ages or calendar dates). However, recent discoveries in areas outside of California have pushed that age back several thousand years more to about 15,000 or even perhaps up to nearly 20,000 years ago (Smith and Barker, 2017).

To describe and understand the cultural processes that occurred during prehistory, archaeologists have routinely developed a number of chronological frameworks to correlate technological and cultural changes recognized in the archaeological record. These summaries bracket certain time spans into distinct archaeological horizons, traditions, complexes, and phases.

There are many such models even for the various sub-regions of Southern California (cf. Grayson, 2011; Warren, 1984; Jones and Klar, 2007). Given the variety of environments and the mosaic of diverse cultures within California, prehistory is typically divided into specific sub-regions that include: The Interior of Southeastern California and the Mojave Desert (Warren and Crabtree, 1986); and San Diego and the Colorado Desert (Meighan, 1954; True, 1958, 1970).

Many archaeologists tend to follow the regional syntheses adapted from a scheme developed by William J. Wallace in 1955 and modified by others (Wallace, 1978; Warren, 1968; Chartkoff and Chartkoff, 1984; Moratto 1984; Sutton et al., 2007 and others). Although the beginning and ending dates vary, the general framework of prehistory in the Southern California area consists of the following four periods:

- **Paleoindian and Lake Mojave Periods** [Pleistocene and Early Holocene] (ca. 11000 B.C. to 6000 B.C.). This time period is characterized by highly mobile foraging strategies and a broad spectrum of subsistence pursuits. These earliest expressions of aboriginal occupation in America were marked by the use of large dart or spear points (Fluted and Concave Base Points) that are an element of the Western Clovis expression. Following the earliest portions of this time span there was a change in climate coincident with the retreat of the glaciers. Large bodies of water existed and lakeside aboriginal adaptations were common. Large stemmed points (Western Stemmed Series – Lake Mojave and Silver Lake point types) were accompanied by a wide variety of formalized stone tools and were employed with the aid of atlatls (dart throwing boards). The latter archaeological materials are thought to be representative of an adaptation that was in part focused on lacustrine and riverine environments.

- **Millingstone Horizon** [Middle Holocene] (ca. 6000 B.C. to A.D. 1000). During this time span mobile hunter-gatherers evolved and became more sedentary. Certain plant foods and small game animals came to the forefront of indigenous subsistence strategies. This prehistoric cultural expression is often notable for its large assemblage of millingstones. These are especially well-made, deep-basin metates accompanied by formalized, portable handstones (manos). Additionally, the prehistoric cultural assemblage of this time period is dominated by an abundance of scraping tools (including scraper planes and pounding/pulping implements), with only a slight representation of dart tipped - projectile points (Pinto, Elko and Gypsum types).

- **Late Prehistoric Period** (ca. A.D. 1000 to 1500). Following the Millingstone Horizon were cultures that appeared to have a much more complex sociopolitical organization, more diversified subsistence base and exhibited an extensive use of the bow and arrow. Small, light

arrow points (ex. Rose Spring Series), and, later, pottery mark this period along with the full development of regional Native cultures and tribal territories.

- **Protohistoric Period** (ca. A.D. 1500 to 1700s). This final cultural period ushered in long-distance contacts with Europeans, and thereby led to the Historic Period (ca. A.D. 1700 to contemporary times). Small arrow points recognized as Desert Side-notched and Cottonwood forms are a hallmark of this time period.

Ethnohistoric Overview

The Project area lies within the area of the Gabrielino/Tongva ethnolinguistic group (Bean and Smith, 1978:538), who speak a language classified as a member of the Uto-Aztecan language stock family. Gabrielino is specifically identified as an element of the Northern Takic Branch of that linguistic group.

The Gabrielino were considered the most populous, wealthiest, and therefore most powerful ethnic nationality in aboriginal Southern California (Bean and Smith, 1978:538). Unfortunately, most Gabrielino cultural practices had declined long before systematic ethnographic studies were instituted. Today, the leading sources on Gabrielino culture are Bean and Smith (1978), and McCawley (1996).

According to the recent research of several prehistorians, Takic groups were not the first inhabitants of the region. Archaeologists suggest that the Takic in-migration may have occurred as early as the Middle Holocene, replacing or intermarrying with indigenous Hokan speakers (Howard and Raab, 1993; Porcasi, 1998). By the time of European contact, the Gabrielino territory included the southern Channel Islands and the Los Angeles Basin reaching east into the present-day San Bernardino-Riverside area and south to Newport Bay in central Orange County.

Different groups of the Gabrielino adopted varied types of subsistence, based on differing combinations of gathering, hunting, and/or fishing. Because of the similarities to other Southern California tribes in economic activities, inland Gabrielino groups' industrial arts, dominated by basket weaving, demonstrated substantial similarity with those of their neighbors (Kroeber, 1925). Coastal Gabrielino material culture, on the other hand, reflected an elaborately developed artisanship most recognized through the medium of steatite, which was rivaled by few other groups in Southern California.

The intricacies of Gabrielino social organization are not well known. There appeared to have been at least three hierarchically ordered social classes, topped with an elite class consisting of the chiefs, their immediate families, and the very rich (Bean and Smith, 1978). Some individuals owned land, and property boundaries were marked by the owner's personalized symbol. Villages were politically autonomous, composed of non-localized lineages, each with its own leader. The dominant lineage's leader was usually the village chief, whose office was generally hereditary through the male line. Often several villages were allied under the leadership of a single chief. The villages frequently engaged in warfare against one another, resulting in what some consider to be a state of constant enmity between coastal and inland Gabrielino groups.

The downtown Los Angeles area, situated among a foothill transition zone and the Los Angeles River traversing the middle, was an ideal location for Native settlements (McCawley, 1996:57). The village of *Yaanga* was situated near the old Plaza of Los Angeles approximately one and a half miles southwest of the Project Site at the edge of the plain, and a village named *Geverobit* was apparently

also very near this same location by the river. The Tongva community of *Maawnga* was set on the west edge of the Cahuenga Hills to the west (McCawley, 1996:55). In the Rose Hills, "on the road from San Gabriel to Los Angeles" according to José Zalvidea, was the village of *'Ochuunga*, a name derived from *'ochuur*, "wild rose" in Tongva. This ancient trail, through the hills connecting the two valleys, was eventually transformed into Mission Road and Huntington Drive, passing approximately 800 feet east of the Rose Hill Courts Project Site. Also referred to as *Otsunga*, this nearby Tongva village was located near the present-day community of El Sereno.

The first Franciscan establishment in Gabrielino territory and the broader region was Mission San Gabriel, founded in 1772. Priests from here proselytized the Tongva throughout the Los Angeles Basin region. As early as 1542, however, the Gabrielino had been in contact with the Spanish during the historic expedition of Juan Rodríguez Cabrillo, but it was not until 1769 that the Spaniards took steps to colonize Gabrielino territory. Shortly afterwards, most of the Gabrielino people were incorporated into Mission San Gabriel and other missions in Southern California (Engelhardt, 1931). Due to introduced diseases, dietary deficiencies, and forceful *reduccion* (removal of non-agrarian Native populations to the mission compound), Gabrielino population dwindled rapidly from these impacts. By 1900, the Gabrielino Native community had almost ceased to exist as a culturally identifiable group. In the late 20th century, however, a renaissance of Native American activism and cultural revitalization took place among a number of groups of Gabrielino descendants. Among the results of this movement has been a return to a traditional name for the tribe, the Tongva, which is employed by several of the bands and organizations representing tribal members. The term *Kizh* is also used by some descendants. Many of the bands focus on maintaining and teaching traditional knowledge, with special focus on language, place names and natural resources.

Historic-Period Overview

<u>Spanish / Mexican Era</u>

Spanish occupation of California began in 1769, in San Diego. The first Europeans to explore the area that would become the state of California were members of the A.D. 1542 expedition of Juan Rodriguez Cabrillo. Cabrillo sailed along the coast of California, but did not explore the interior. Europeans did not attempt inland exploration until 1769, when Lieutenant Colonel Gaspar de Portolá led an overland expedition from San Diego to Monterey. This expedition of 62 people passed immediately north and west of the current study area in August 1769 (Brown, 2001), and may have encountered the Tongva village of *Koruuvunga* in the Santa Monica region (Brown, 2001:347; McCawley, 1996:61). The Expedition camped near here, at the village's water supply, a spring which is still flows to this day on the grounds of University High School. The name was said to mean "we are in the warmth, it says we are in the sun now…" (Harrington, 1986; in McCawley, 1996:61). Mission San Gabriel was established in the Los Angeles Basin in 1772, and the Los Angeles pueblo was established as a civilian settlement on September 4, 1781 (Engelhardt, 1931). The Mission San Gabriel lands were used for the support of the mission and provided for the large population of Tongva Native Americans. The mission lands were held in trust for Native peoples by the Franciscan missionaries for eventual redistribution.

Mexico rebelled against Spain in 1810, and by 1821, Mexico, including California, achieved independence. The Mexican Republic began to grant private land to citizens to encourage emigration to California. Huge land grant ranchos took up large sections of land in California. Ranchos surrounded the mission lands in all directions. Some lands along the coast, however, were open for early settlement to the colonists from New Spain.

After Mexican independence from Spain, the Rancho Rosa de Castilla (Rose of Castile Ranch) was granted in 1831 to Juan Ballesteros. He was the Registrar of the Pueblo of Los Angeles from 1823 to 1824. The rancho was named after the stream running through the area. This stream was called the Arroyo Rosa de Castilla because of the roses growing on its banks. It includes what are now Lincoln Heights, El Sereno, City Terrace, and parts of South Pasadena, Alhambra, and Monterey Park. After the secularization of the missions in 1833, the ranch passed to Francisco (Chico) Lopez. He had a home in Paredon Blanco (now Boyle Heights), but kept his cattle at Rancho Rosa. In 1840 he expanded the adobe on the ranch which had been built by neophyte Indian workers from the Mission in 1776. This adobe was located in what is now the City of Alhambra near Westmont Drive and Jurich Place. In the later 1840s he obtained title to a ranch near Lake Elizabeth in northern Los Angeles County and moved his cattle from Rancho Rosa de Castilla to this ranch.

The Mexican-American War of 1846 saw the invasion of California from both land and sea by the Americans. Following several skirmishes in the San Diego and Los Angeles areas, and the capture of the territorial capital in Monterey, the United States rule was firmly established. Following the rapid influx of population to the north because of the Gold Rush of 1849, California was made a state in 1850. The economic and social order was slow to change in the southern portion of the state, however, and rancheros were left in control of their vast estates through the 1860s. Los Angeles was a part of the "Cow Counties" and had little representation in the state legislature because of the sparse population. This allowed the predominantly Anglo population of the north to pass laws aimed at breaking up the ranches for settlement by Eastern farmers and, coupled with devastating droughts that crippled many livestock raisers, their dismemberment soon came about. This helped pave the way for the "Boom of the Eighties" which saw an influx of people from the rest of the United States and the beginning of many of the towns we see today (Dumke, 1944). This was the first spurt of growth for Los Angeles, satellite communities started to form around the city to the east, south and west, and much of the plains between these areas came to be filled with farms and orchards.

History of the City of Los Angeles

During the initial incursion of Spain into Alta California by the Portolá Expedition, a camp was made along the Los Angeles River in August 1769. Father Juan Crespí, a member of the expedition, noted the fitness of the area for supporting a large settlement. He named the river El Rio de Nuestra Senora la Reyna de Los Angeles de Porciuncula (The River of Our Lady the Queen of the Angels of Porciuncula). Twelve years later, near this camp, El Pueblo de la Reina de los Angeles was founded.

The pueblo was planned in response to the increasing agricultural needs of Spanish presidios in Alta California. A tract of 28 acres was issued by California Governor Felipe de Neve in 1781 where the town site would be established, and a small group of colonists from New Spain (Mexico) then set out to develop a pueblo near the river. It was official founded on September 4, 1781. The original pueblo consisted of a central square surrounded by twelve houses and a series of agricultural fields. Thirty-six fields occupied 250 acres between the town and the river to the east. An irrigation system to carry water from the river to the fields and the pueblo was the communities' first priority and was constructed almost immediately. The main irrigation ditch, or Zanja Madre, was completed by the end of October that year. It carried water south along Alameda Street to the pueblo and then beyond to the fields. As the water needs of Los Angeles increased, additional ditches that branched off of the Zanja Madre were excavated.

By 1786, the pueblo had attained self-sufficiency and subsidies from the Spanish government ceased. With a secure water supply and an expanding irrigation system, agriculture and ranching grew. By the early 1800s the pueblo, as originally intended, produced surplus wheat, corn, barley, and beans

for the presidios, cutting the Crown's costs of supplying the forts. A large number of livestock, including cattle and sheep, grazed in the surrounding lands sometimes in competition with the San Gabriel Mission ranchos.

Following Mexican independence from Spain in 1822, during the rivalries for control of the territorial government between northern and southern factions, for a period Los Angeles was the capital the California territory starting in 1835. With the invasion of California by United States forces during the Mexican-American War, several battles were fight in the Los Angeles region, and the formal surrender of California was signed at nearby Cahuenga. But few visited the area and the town remained a "sleepy agricultural village" until the Gold Rush in 1848. During the Gold Rush with a huge influx of immigrants from the eastern United States and the world to the northern mining fields, Los Angeles ranchers were able to command high prices for their cattle and produce, as demand outstripped supply. After California was admitted to the Union in 1850, the population of Los Angeles tripled within the next decade.

When Los Angeles was connected to the transcontinental railroad via San Francisco on September 5, 1876, it experienced a boost in population. The city would experience its proportionately greatest growth in the 1880s when two more direct rail connections to the East Coast were constructed. The Southern Pacific completed its second transcontinental railway, the Sunset Route from Los Angeles to New Orleans, in 1883. Then in 1885, the Santa Fe Railroad completed a competing transcontinental railway to San Diego, with connecting service to Los Angeles. The resulting fare wars led to an unprecedented real estate boom within Los Angeles and saw the start of many satellite farming communities to meet the population's demand. Despite a subsequent collapse of the real estate market, the population of Los Angeles increased 350 percent in the decade between 1880 and 1890.

With the population boom of the 1880s droving the demand for real estate in Los Angeles, farmland south and east of the city began to be replaced by residential and commercial development. Large tracts of agricultural land, now far more valuable for residential development, were subdivided and sold. From 1920 to 1930, Los Angeles experienced another population explosion, due in part to the automobile and the development of the movie industry. All told, between 1890 and 1930, the population of Los Angeles increased from 50,000 to 1.2 million people.

The American Ranch Period through History of El Sereno

The following discussion was adapted from the "History of El Sereno" (Cassen, 1994), provided by the El Sereno Historical Society.

The Rancho Rosa de Castilla was acquired around 1850 by Anaclet Lestrade, priest of Our Lady of the Angels Church on the Los Angeles Plaza. Juan Baptiste and his wife Catalina Hegui Batz, who had arrived in California from Argentina in 1850, acquired the adobe ranch house in 1852 from Lestrade. Jean-Baptiste engaged in farming and sheep ranching until his death on December 6, 1859. Under the Homestead Act, in 1876 Catalina Batz received official title to the 160 acres upon which the adobe stood. The ranch eventually encompassed a total of 3,283 acres of land. It included the later communities of Ramona Acres (City of Alhambra), Sierra Vista (El Sereno), Sierra Park (El Sereno), West Alhambra (Alhambra and El Sereno), and Bairdstown (El Sereno) west to El Sereno Avenue (now Eastern Avenue).

By 1869, what is now Mission Road/Monterey Road proceeded from the western end of present El Sereno through a pass in the hills to the Rancho San Pasqual. Roses Road was established by 1873,

beginning at the present intersection of Huntington Drive and Monterey Road and proceeding east. Later known as the Los Angeles-Pasadena Road and East Los Angeles Road, it passed approximately where Huntington Drive is today. About 1875, Brown Road was established through this area. It ran northeasterly from Lincoln Park, at present-day Valley Boulevard and Mission Road in Lincoln Heights, to Alhambra Road and Fremont Avenue. It was abandoned about 1900.

The pastoral setting of this area changed with the development of rail transportation lines through here. Los Angeles started to recover from the slump that had followed the boom of the late 1890s. The Southern Pacific Railroad was built through the El Sereno area in 1876. Catalina Batz purchased the majority of the excess lands adjacent to the tracks after the railroad was completed. Due to Southern Pacific's high rates, development of this area did not immediately follow. Competition soon followed with the advent of the Santa Fe Railroad, which built tracks to Los Angeles in 1887. A fare war between the two railroads lowered rates, bringing many immigrants from the East and Midwest to Los Angeles. During the subsequent real estate boom, the Yorba and Paige Tract, at the western edge of El Sereno, was recorded in October 1887. A few years after the bust of 1888, the adjacent Omaha Heights Tract was recorded in 1892. On May 1, 1895 the first interurban rail route in Southern California opened from Los Angeles to Pasadena along the Arroyo Seco, spurring subdivisions along that route. In 1902, the Pasadena Short Line was opened along Los Angeles-Pasadena Boulevard, now Huntington Drive.

The Short Line Villa Tract was annexed to the City of Los Angeles as part of The Arroyo Seco Annexation on February 9, 1912. This annexation also included the Yorba and Paige Tract, Grider and Hamilton's Rose Hill Tract adjacent to Monterey Road, and the Pasadena Villa Tract, a local subdivision that extended south from the Arroyo Seco.

El Sereno's population rose markedly as the country prepared for World War II. Due to the rationing of gas and rubber, communities along the Pacific Electric routes received the majority of new residents who came to work at the aircraft and munitions factories in Los Angeles. El Sereno experienced major industrial growth during these years. Many of the families who moved here during these years were Italian-American. The population increase lead to the construction of the El Sereno theatre, the third such establishment in the community.

Restrictive covenants had prevented Mexican-American families who lived in the adjacent communities of Lincoln Heights and Boyle Heights from purchasing homes in El Sereno. After restrictions were lifted by a 1948 Supreme Court decision (Shelly v. Kraemer), many Mexican-American families moved to El Sereno. The demand for housing after World War II was satisfied by the construction of new neighborhoods in the southern end of El Sereno.

History of the Project Site – HACLA and Rose Hill Courts

During the Great Depression, overcrowded and dilapidated housing and homelessness were major problems in Los Angeles. Private housing construction slowed dramatically, while the population increased. According to the Real Property Inventory in 1939, 7,702 people lived in units with no inside toilet facilities. A year later, the U.S. Census found 19,039 families living in overcrowded conditions.

During the late 1930s and early 1940s, several aircraft manufacturing firms relocated to Southern California, joining local firms such as Douglas Aircraft. Increased growth in the shipping industry also began to pull Los Angeles out of the Great Depression. The growing demand for labor meant that those who were underemployed or unemployed could rejoin the work force. Thousands of workers

arrived in Los Angeles seeking manufacturing jobs in the city's emerging aircraft and ship building industries. Migration to Los Angeles from other parts of the country contributed to the housing problem. Between 1930 and 1940, the population of Los Angeles rose from approximately 1.2 million to 1.5 million, yet the construction of new housing units was very low.

The Housing Authority of the City of Los Angeles (HACLA) was chartered by the State of California in 1938 as part of a comprehensive program to alleviate housing shortages, to eradicate substandard housing, and to improve housing quality. A clause in the Wagner-Steagall Act, known as the "equivalent elimination clause," explicitly linked the policy of slum clearance to the construction of new public housing. The clause required local agencies to destroy "slum properties" in a quantity equal to the number of new dwelling units being constructed. Legislators believed that this requirement would eliminate the competition between the government and the private housing market.

Nicola Giulii was appointed the chairman of the board and Charles H. Fennel was hired as the executive director of HACLA. However, local politics in Los Angeles prevented the newly formed agency from commencing with its mission. With a grant from the Works Progress Administration, the agency was able to conduct a survey of housing conditions in Los Angeles to demonstrate the need for federal funds. With this information, HACLA was able to identify the location of its first projects. $25,000,000 in federal funds were earmarked for Los Angeles, although the survey identified a need for $45,000,000. By the end of 1939, HACLA had developed plans and issued bids for its first project, Ramona Village in Boyle Heights.

In 1941, HACLA acquired five acres of land for the construction of Rose Hill Courts. Rose Hill was the place name for the area at the end of the nineteenth century, but the name slowly began to fade away. The Rose Hill Tract was subdivided by the real estate firm Grider & Hamilton in 1904. The tract included 132 lots that were conveniently located near a Pacific Electric Railway stop at Huntington Drive and Monterey Road. A 50-x-75-foot lot could be purchased for as little as $150. Lots sold slowly, however, by 1909 there were enough children living in the area for the construction of a school. After the area was annexed by the City of Los Angeles, the name was changed from the Rose Hill School to the Huntington Drive School, and later the Huntington Drive Elementary School.

During the 1920s, the Rose Hill Civic Improvement Association attempted to preserve the predominately Anglo majority. The group actively prevented Japanese immigrants from moving into the area. By the end of the decade, the area was almost exclusively occupied by Mexican Americans. In the 1930 U.S. Census, many of the men living in the area indicated that they worked in the construction or railroad industries. Although tens of thousands of Mexican and Mexican Americans in Los Angeles were deported by repatriation programs during the 1930s, the Rose Hill neighborhood continued to be predominately Latino.

Rose Hill Courts Housing Project, 1951
(USC Digital Library, Los Angeles Examiner Collection)

HACLA demolished the existing buildings on the Rose Hill site in 1941, and commenced building the new housing project in 1942. The *Los Angeles Times* reported that "a total of 125 old houses will have to be razed to clear the property." The United States' entrance into World War II in December 1941 interrupted the construction of Rose Hill Courts. At this point, winning the war became the federal government's first priority. As part of its mobilization efforts, the government reassigned all new public housing projects still under construction as war worker housing for the purposes of national defense. This mandate included Rose Hill Courts.

Rose Hill Courts was completed in June 1942 and opened to defense workers later that year. After the war, the property again became public housing as many of the residents returned to other parts of the country, or found housing elsewhere. Rose Hill Courts filled an essential need for new quality housing in Los Angeles during and after the Second World War. It remains in this same use today.

Identified Cultural Resources

<u>Historic Architectural Resources</u>

The Rose Hill Courts apartment complex itself was formally determined eligible for listing on the NRHP as a historic district in 2003, and therefore it was automatically listed in the CRHR (Grimes, 2015). Properties that are listed in the CRHR are historical resources as defined by CEQA. This is described above in "Project Site – Architectural Setting."

Based on the cultural resources records search conducted at the SCCIC, no prehistoric cultural resource sites or isolates have been recorded within the Area of Potential Effect (APE) or Project boundary, or within the half-mile buffer surrounding the APE. The records search did show the presence of one historic property within the half-mile buffer (**Table 4.4-2**). This is the Soto Street Bridge over Mission Road and Huntington Drive South (P-19-188230). Built 1936–38, the bridge carries Soto Road over Mission Road and Huntington Drive South. It is 149.7 meters long and 13.4 meters wide, made of concrete with details in the Art Deco style. An Historic Properties Survey Report for the Soto Street Bridge Removal Project was prepared in 2001 by Portia Lee, and an updated site record was prepared the following year by Jessica B. Feldman (2002). The bridge is approximately 2,250 feet south of the Project Site.

Rose Hill Courts is significant as one of the oldest public housing complexes in Los Angeles and exemplified city planning and public welfare practices, and was determined eligible for listing in the NRHP; therefore, it is automatically included in the CRHR (Grimes, 2015:1). GPA (2018:19) also states that Rose Hill Courts is eligible for the NRHP under Criteria A, "Associated with events that have made a significant contribution to the broad patterns of our history," and Criteria C, "Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or

that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction (2018:4).

GPA's 2018 Historical Resources Report (2018:19) found that "the Project would have a significant adverse impact on Rose Hill Courts . . . [and that] [t]he impact would be direct and cumulative."

Table 4.4-2
KNOWN CULTURAL SITES WITHIN A HALF-MILE BUFFER OF THE APE

Site Number	Author(s)	Date	Description
P-19-188230	J.B. Feldman	2002	A concrete bridge, sections in Art Deco style, build 1936–38, allowing Soto Street to span over Mission Road and Hunting Drive South. 149.7 meters long 13.4 meters wide.

Archaeological Resources

California Historic Resources Information System

A cultural resources records search for the proposed Project was conducted by Ms. Megan Black, B.A. The purpose of the records search was to identify previously recorded cultural resources (prehistoric and historic archaeological sites, historic buildings, structures, objects, or districts) within the Project area and a half-mile radius. The records search included a review of previously recorded prehistoric and historic archaeological sites within the Project area and a 0.5-mile buffer, and a review of listed cultural resource surveys and/or excavation reports within that same geographical area. The research was conducted at the South Central Coastal Information Center (SCCIC) at the California State University, Fullerton, which is the local California Historic Resources Information System (CHRIS) Information Center.

Three previous cultural resources surveys identified in the CHRIS records search within the half-mile buffer zone, but none of them touched upon the Project Site itself. None of these surveys identified archaeological sites or isolates. No archaeological (prehistoric) resources with the half-mile buffer zone were identified.

Pedestrian Survey

A pedestrian field survey to look for the presence of cultural resources was conducted May 23, 2018. Survey transects were conducted in an opportunistic manner in conformity with the available exposed ground surface and layout of the landscaping.

The result of the pedestrian survey was negative for both prehistoric and historic archaeological sites, features and isolates.

Native American Outreach

UltraSystems prepared letters to each of the nine tribal contacts representing seven tribal organizations provided by the NAHC (Attachment C to **Appendix I1** of this document). On April 26, 2018 Mr. O'Neil mailed letters and sent emails with accompanying maps to all nine tribal

contacts describing the Project and showing the Project's location, requesting a reply if they have knowledge of cultural resources in the area that they wished to share, and asking if they had any questions or concerns regarding the Project.

Mr. Andrew Salas, Chairman of the Gabrieleño Band of Mission Indians – Kizh Nation, replied by email May 1, 2018 stating that the Project area has the potential for discoveries of cultural resources, and requested that Native American monitors be present during ground disturbing activities. Mr. Jairo Avila, THPO for the Fernandeño Tataviam Band of Mission Indians, responded by email on May 10, 2018, stating that the Project location is outside the Tataviam Band's area of concern and consultation, and that they would defer to members of the Gabrielino tribe who should be contacted instead.

Following up on the initial letter and email contacts, telephone calls were conducted by Archaeological Technician Megan Black on May 29, 2018 to the five tribal organizations who had not previously responded by email. There were three telephone calls placed with no answer, at which messages were left – to Ms. Linda Candelaria, Co-chairperson of the Gabrielino-Tongva Tribe; Ms. Sandonne Goad, Co-Chairperson of the Gabrielino/Tongva Nation; and Mr. Charles Alvarez with the Gabrielino-Tongva Tribe. When Chairperson Donna Yocum with the San Fernandeño Band of Mission Indians was reached, she deferred to more local tribal entities. During the call to Mr. Anthony Morales, Chairperson of the Gabrielino/Tongva San Gabriel Band of Mission Indians, he stated that the project area is culturally sensitive to the Band and requested that both a Native American and an archaeological monitor be present during ground-disturbing activities. Mr. Robert F. Dorame, Chairperson of the Gabrielino Tongva Indians of California Tribal Council, stated during the UltraSystems' telephone call that he would like to have the contact letter and map re-sent to him via email, and to give them a week to respond, and that if we received no further response from them in that time then they have no comment; the letter and map were re-sent to him the same day; however, there has been no further reply to date. These contacts and replies are documented in the Native American Contact Log in Attachment C to **Appendix I1** of this document.

4.4.3 Project Impacts

4.4.3.1 Threshold of Significance

In accordance with Appendix G of the State CEQA Guidelines, the project would have a significant impact related to cultural resources if it would:

Threshold (a): ***Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5; or***

Threshold (b): ***Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5; or***

Threshold (c): ***Disturb human remains, including those interred outside of dedicated cemeteries.***

4.4.3.2 Methodology

UltraSystems established the presence of historic properties within the APE through background research, desktop visual inspections of the APE, pedestrian survey and tribal consultation. Specific identification efforts for this undertaking are discussed below. The APE (**Figure 4.4-1**) includes the

project footprint. Ground disturbance would occur in areas that were previously disturbed by construction of the original Rose Hill Courts in 1942. There are, in fact, no undisturbed ground surfaces in this highly urbanized environment for the entire reach of the Project Site.

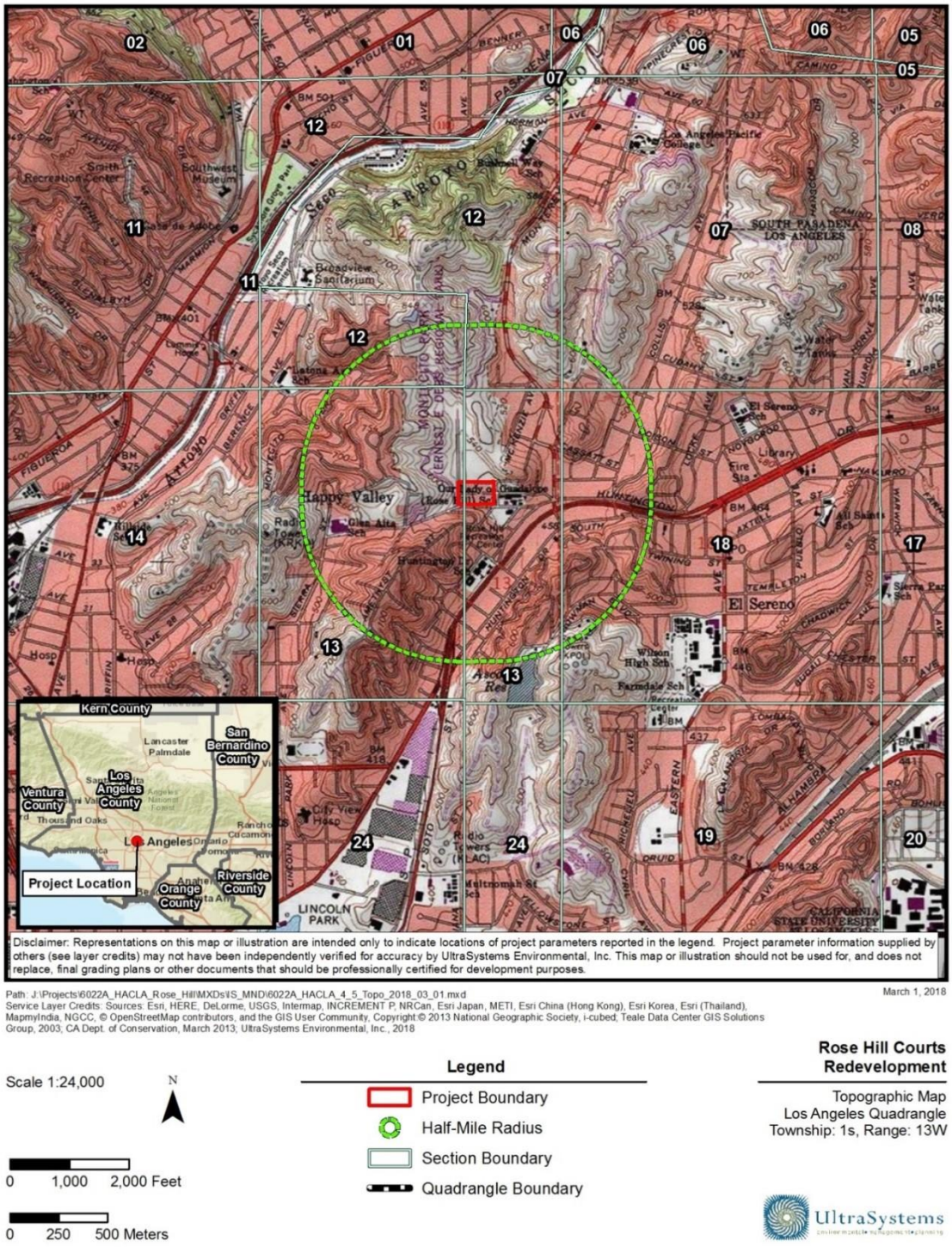
The record search and literature review conducted by UltraSystems for the Rose Hill Courts Redevelopment Project provided the basic overview information for this document. A cultural resource records and literature search was conducted in November 2016, utilizing a half-mile buffer beyond the APE, at the South Central Coastal Information Center (SCCIC). The SCCIC is the regional repository for the California Historical Resources Information System (CHRIS). The record search there included archaeological site records and reports, California Points of Historical Interest, California Historical Landmarks, the CRHR, the NRHP, the California Historical Resources Inventory, the City of Los Angeles Historic-Cultural Monuments, and the Caltrans Historic Bridge Inventory. The record search only includes the results of previous archaeological or historical surveys and other investigations.

On May 23, 2018, Archaeologist Stephen O'Neil, M.A., RPA, visited the project area to conduct a pedestrian survey. There are wide lawns surrounding the perimeter of the Project Site along the bordering four streets, McKenzie Avenue on the east, Mercury Avenue on the south, Boundary Avenue on the west and Florizel Street to the north. Transects covering these lawns on each side were walked. Between the housing buildings were lawns and flower beds with trees, shrubs and annual bedding plants; these lawns were walked and the flower beds were observed by walking along their edges. The lawns provided a mix of visibility for surface soil; some areas were well maintained, on which occasions there was no soil visible; large portions, however, showed considerable die-back and/or had numerous gopher hole tailings which provided views of surface and sub-surface soil. The perimeter patches of sparse grass cover and base of the interior flower beds allowed for approximately 20% visibility overall. It was observed that over the decades many of the original interior ornamentals had been replaced by roses and plumeria. To an even greater degree, however, the replacements were economically useful edible plants often seen in Hispanic neighborhoods, such as *Opuntia* cactus, *yerba buena* (mint), loquat trees, thyme, sugar cane, varieties of chilies, shallots, grape vines and tomatoes among others. Also observed at a residence was the noteworthy use of the garden rue (*Ruta graveolens*), a plant known for its quality of spiritual protection.

During the survey, the Project Site was carefully inspected for any indication of human activities dating to the prehistoric or historic periods (i.e., 50 years or older). Because of the fully-built environment of the site, direct observation of the ground was limited to landscaping with exposed soil around the outer yards facing the four surrounding streets and the interior flower beds between the residential buildings.

UltraSystems contacted the California NAHC for a search of the Sacred Lands File (SLF) to determine if there is any record of sensitive sites or TCPs in the APE and buffer zone, and to obtain the most current list of Native American contacts for outreach. The NAHC responded on April 26, 2018 that there were no records of Native American cultural resources present, and provided a list of tribal contacts for UltraSystems to ask about potential resources. UltraSystems contacted these tribal representatives by letter on April 26, 2018 (refer to Attachment C in **Appendix I1**), and requested information about TCPs and resources of concern within the APE. There were five responses by the Native American contacts during the course of the Phase I cultural inventory investigation – see Section 4.4.2.2 "Existing Conditions," Native American Outreach on page 4.4-23 above for the results of these contacts.

Figure 4.4-1
USGS TOPOGRAPHIC MAP OF THE STUDY AREA



4.4.3.3 Analysis of Project Impacts

Threshold (a): Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

The Rose Hill Courts apartment complex itself was formally determined eligible for listing on the NRHP as a historic district in 2003, and therefore it was automatically listed in the CRHR (Grimes, 2015). Properties that are listed in the CRHR are historical resources as defined by CEQA. An assessment of potential adverse effects to the property has been prepared separately (GPA Consulting, 2018), and recommendations to mitigate the adverse effect of the project to this historic property have been made by GPA (2018:32-33).

The project will involve the demolition of the existing Rose Hill Courts public housing complex. In most circumstances, the demolition of a historical resource cannot be mitigated to a less than significant level. Therefore, the project would have a significant adverse impact on this historical resource.

The GSA Historic Resource Technical Report determined that "…there is no potential for the Project to result in indirect impacts on historical resources in the vicinity" (2018:29). This determination was made on the basis that, while the Rose Hill Courts is surrounded on all four sides by a number of structures and features including Earnest E. Debs Regional Park, Rose Hill Recreation Center, Our Lady of Guadalupe School, as well as single family and multi-family residential developments, none of these properties have been previously identified or recorded as significant in a historical resources survey (2018:29).

As the project would involve the demolition of the existing Rose Hill Courts public housing complex, the significance of Rose Hill Courts would be materially impaired by the project because it would no longer be listed in the CRHR or eligible for listing in the NRHP if it were demolished. **Therefore, the project would have a significant adverse impact on this historical resource.**

The City of Los Angeles, through HCID, published a Notice of Intent (NOI) to prepare a combined Environmental Impact Statement (EIS) in accordance with the National Environmental Policy Act (NEPA) and Environmental Impact Report (EIR) in accordance with the California Environmental Quality Act (CEQA) (EIR/EIS) for the Project. The proposed action is subject to compliance with NEPA because HACLA is proposing a HUD Section 18 demolition/disposition and the developer is planning to use Project-based Section 8 vouchers. The Project involves funding from HUD that qualifies as an "undertaking" subject to the Programmatic Agreement (PA) among the City of Los Angeles, the California State Historic Preservation Officer (SHPO), and the Advisory Council on Historic Preservation (ACHP) regarding Historic Properties affected by use of Community Development Block Grants; McKinney Act Homeless Programs including the Emergency Shelter Grants Program, Transitional Housing, Permanent Housing for the Homeless Handicapped, and Supplemental Assistance for Facilities to Assist the Homeless; Home Investment Partnership Funds, and the Shelter Plus Care Program for compliance with 36 CFR part 800, the regulations implementing Section 106 of the NHPA. HCID initiated the Section 106 consultation process with SHPO through the Project PA.

HCID prepared a draft PA with the two project sponsors, HACLA and the Related Companies of California (Related), as Concurring Parties, to implement stipulations to take into account the effect of the project on potential historic properties, and outlining actions to be taken if historical or cultural

deposits are discovered during project construction. The draft PA is currently being reviewed by SHPO. These stipulations are summarized below:

Stipulation I. ADDRESSING ADVERSE EFFECTS OF THE UNDERTAKING ON HISTORIC ARCHITECTURAL PROPERTIES

A. Related shall prepare an interpretive display and install it in the new community building on the redeveloped Rose Hill Courts property. The interpretive display shall be completed to coincide with the opening of the community building once construction is complete.

B. HACLA shall add to its existing website a section dedicated to the history of HACLA and public housing in Los Angeles within six (6) months of completing the Rose Hill Courts Redevelopment Project.

Stipulation II. ADDRESSING ADVERSE EFFECTS OF THE UNDERTAKING ON ARCHAEOLOGICAL PROPERTIES

HCID shall ensure that all work carried out pursuant to this agreement shall be done by or under the direct supervision of historic preservation professionals who meet the Secretary of the Interior's (SOI) Professional Qualifications for Archaeology, and that all work carried out pursuant to this Agreement shall meet the SOI's Standards for Archaeology and Historic Preservation. A testing program and field study shall be conducted when deemed necessary by the Project Archaeologist, using an Archaeological Testing Plan (see Stipulation III) as deemed necessary by the Project Archaeologist. Archaeological and Native American Monitors shall be made available as deemed necessary by the Project Archaeologist using an Archaeological and Native American Monitoring Program (ANMP) as deemed necessary by the Project Archaeologist.

Stipulation III. ARCHAEOLOGICAL TESTING AND EVALUATION PROGRAM

A. HCID shall ensure that all work carried out pursuant to the PA shall be done by or under the direct supervision of historic preservation professionals who meet the SOI Professional Qualifications for Archaeology.

B. The archaeological testing program shall be conducted in accordance with an approved Archaeological Testing Plan (ATP) that will be reviewed by the project sponsors.

C. The purpose of the ATP will be to determine the extent and possible presence/absence of archaeological resources and to identify whether the resources constitute an historical property using the criteria of the NRHP.

D. At the completion of the ATP, the Project Archaeologist and Staff Archaeologists shall submit a written report of the findings.

E. If the Project Archaeologist determines that a significant archaeological resource is present and that the resource could be adversely affected by the project, at the discretion of the project sponsors either:

- The proposed project shall be re-designed as to avoid any adverse effects; or
- A data recovery program shall be implemented.

F. Archaeological Data Recovery Program

- The scope of the ADRP shall include the following elements:

- Field Methods and Procedures.
- Cataloguing and Laboratory Analysis.
- Discard and Deaccession Policy.
- Interpretive Program.
- Security Measures.
- Final Report.
- Curation.

G. Evaluation of Archaeological Resources. HCID shall use the NRHP criteria for evaluating the significance of the archaeological properties. If resources are discovered that the Project Archaeologist determines meet the significance criteria of NRHP Criterion D, and if preservation in place is not feasible, an ADRP shall be implemented in accordance with this PA. If resources are found to meet NRHP criteria A and/or B and/or C, then representatives of the appropriate descent community or the appropriate community members shall be notified upon the determination.

H. Archaeological Monitoring Program (AMP). If the Project Archaeologist in consultation with the Staff Archaeologist(s) determines that an archaeological monitoring program shall be implemented then the AMP shall minimally include the following provisions:

- The Staff Archaeologist(s), Project Archaeologist, and project sponsor shall meet and consult on the AMP reasonably prior to the commencement of ground disturbing activities by the project.
- The Staff Archaeologist(s) (in consultation with the Project Archaeologist) shall determine what project activities shall be archaeologically monitored.
- Archaeological Monitor(s) including a Native American Monitor under the supervision of the Staff Archaeologist(s) and as approved by the Project Archaeologist shall be present and compensated for their services.
- If an intact archaeological deposit is encountered, all soil-disturbing activities in the vicinity of the deposit shall cease.

I. Final Archaeological Resources Report.

- The report shall evaluate the historical significance of any discovered archaeological remains and shall describe the research methods employed in the testing, monitoring, and data recovery programs undertaken. Information that may put at risk any archaeological resource shall be provided in a separate removable insert within the final report.
- Once approved by the Project Archaeologist and the project sponsors, copies of the FARR shall be distributed to local repositories.

Stipulation IV. CONSULTATION WITH DESCENDANT COMMUNITIES

On discovery of archaeological material associated with descendant Native Americans or other potentially interested descendant group(s), appropriate representatives of the descendant groups and the Project Archaeologist shall be contacted. Representative(s) of the descendant group(s) shall be given the opportunity to monitor archaeological field investigations of the material and to consult with the Project Archaeologist regarding appropriate treatment of the material, of the recovered data, and, if applicable, any analysis, interpretative treatment, cataloguing, curation, reporting, and/or repatriation of the archaeological material.

Stipulation V. TREATMENT OF HUMAN REMAINS OF NATIVE AMERICAN ORIGIN

If human remains are discovered at any time during the implementation of the Undertaking, HCID, the Project Archaeologist and the project sponsors shall follow the provisions of the Native American Graves Protection and Repatriation Act (NAGPRA) (25 USC§ 3001) and the California Health and Human Safety Code § 7050.5. This includes immediate notification of the Los Angeles County Coroner, and in the event of the Coroner's determination that the human remains are prehistoric Native American remains, notification of the California State NAHC.

Stipulation VI. DISCOVERIES AND UNANTICIPATED EFFECTS

If HCID determines after construction of the Undertaking has commenced, that the project will affect a previously unidentified property or affect a known historic property in an unanticipated manner, HCID will address the discovery or unanticipated effect in accordance with 36 CFR §800.13(b)(3).

Based on the analysis above, impacts on historical resources from the proposed project would be significant and unavoidable. Rose Hill Courts is a historical resource because it was formally determined eligible for listing in the NRHP and therefore is automatically listed in the CRHR. Demolition of the existing Rose Hill Courts would cause a substantial adverse change in the significance of a historical resource. Though the above measures in the Programmatic Agreement would reduce impacts related to demolition of Rose Hill Courts, no mitigation measures are available for the proposed project that would fully reduce impacts on historical resources to a less than significant level. Therefore, this impact would be significant.

Threshold (b) Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

No prehistoric or historic archaeological resources were observed during the pedestrian field survey. The previous cultural resources surveys within the half-mile buffer zone resulted in no archaeological sites or isolates being recorded. A single historic property, a bridge, was identified within the half-mile buffer zone, but it is not within the APE. The field survey conducted for this project observed no prehistoric or historic artifacts or features.

As per the discussion with the Gabrielino Band of Mission Indians – Kizh Nation and the Gabrieleno/Tongva San Gabriel Band of Mission Indians during the tribal outreach in 2017, both recommended archaeological and tribal monitoring take place during ground disturbance construction activity associated with the project undertaking. The Gabrieleno-Kizh Nation and the San Gabriel Band believe that the project lies in a sensitive area regarded as the ancestral and traditional territories of both entities. The cultural resource study findings conclude that there is only a low potential for finding resources. At a minimum, however, if prehistoric and/or historic items are observed during subsurface activities, it is recommended that work be stopped in that area and a qualified archaeologist should be called to assess the findings and retrieve the material. At this point monitoring by a qualified archaeologist and a tribal representative may be called for. The qualified archaeologist may recommend further investigations if warranted. Further protocols are provided for by the Condition of Approval in **Section 4.13 - Tribal Cultural Resources**.

The Project Site has undergone multiple phases of development since the early 20th century onward. This development began in the early 1920s with construction of the current roads and a number of individual residences throughout what is now the Rose Hill Courts site. This was followed by removal

of all the residences in the center in the early 1940s and the construction of Rose Hill Courts itself. The Rose Hill Courts structures had no basements or privies that would leave historic-period deposits. The fully-built environment of the Project Site, the elevation of the Project Site relative to adjacent roads suggesting that ground here has been significantly cut and filled, and the high degree of disturbance associated with the construction of the buildings currently present within the Project Site, any subsurface archaeological features have likely been destroyed. The potential for subsurface cultural and or historical deposits is minimal based on the above findings. **Therefore, impacts to archaeological resources would be less than significant.**

Nonetheless, in an effort to take into account the effect of the project on potential archaeological resources, the project will be subject to a condition of approval as an additional means of protection for the inadvertent discovery of an archaeological resource:

Condition of Approval – Archaeological Resource Inadvertent Discovery **(CUL-COA-1)**

If archaeological remains are discovered during the course of Project construction, Stipulations of the PA will address the potential needs for monitoring, evaluation, excavation and report preparation. These may include an Archeological Testing Plan (Stipulation III), an Archaeological Data Recovery Program (Stipulation III.E), archaeological and Native American monitoring with an Archaeological Monitoring Program (Stipulation III.G), a Final Archaeological Resources Report (Stipulation III.H), consultation with descendant communities (Stipulation IV), treatment of human remains of Native American origin (Stipulation V), and discoveries and unanticipated effects (Stipulation VI).

Threshold (c): Would the Project disturb human remains, including those interred outside of dedicated cemeteries?

As discussed in the Initial Study prepared for the project, included as **Appendix B** of this Draft EIR, due to the level of past disturbance at the Project Site, it is not anticipated that human remains, including those interred outside of formal cemeteries, would be encountered during earth removal or disturbance activities. No human remains have been previously identified or recorded onsite. Notwithstanding, ground-disturbing activities on the Project Site, such as grading or excavation, have the potential to disturb as yet unidentified human remains.

If human remains are encountered during excavations associated with this project, work will halt and the Los Angeles County Coroner will be notified (§ 5097.98 of the Public Resources Code). The Coroner will determine whether the remains are recent human origin or older Native American ancestry. If the coroner, with the aid of the supervising archaeologist, determines that the remains are prehistoric, they will contact the NAHC. The NAHC will be responsible for designating the most likely descendant (MLD), who will be responsible for the ultimate disposition of the remains, as required by § 7050.5 of the California Health and Safety Code. The MLD will make recommendations within 24 hours of his or her notification by the NAHC. These recommendations may include scientific removal and nondestructive analysis of human remains and items associated with Native American burials (§ 7050.5 of the Health and Safety Code). Grading activities associated with development of the project would cause new subsurface disturbance and could result in the unanticipated discovery of unknown human remains, including those interred outside of formal cemeteries. In the event of an unexpected discovery, those remains would require proper treatment, in accordance with applicable laws. State of California Public Resources Health and Safety Code §§ 7050.5-7055, and § 5097.98 of the California PRC, describe the general provisions for human remains. Following compliance with State regulations, which detail the appropriate actions

necessary in the event human remains are encountered, impacts in this regard would be less than significant. **The project would have a less than significant impact with respect to Threshold (c). Therefore, a less than significant impact would occur and no further analysis is required.**

4.4.4 Cumulative Impacts

Historic Architectural Resources

The project would involve the demolition of the existing Rose Hill Courts public housing complex. Rose Hill Courts is a historical resource because it was formally determined eligible for listing in the National Register and is listed in the California Register. After implementation of Programmatic Agreement Stipulation I, the project would have a significant and unavoidable impact on historical resources.

No prehistoric or historic archaeological resources were observed during the pedestrian field survey. The previous cultural resources surveys within the half-mile buffer zone resulted in no archaeological sites or isolates being recorded and one historic structure outside the Project Site. The fully-built environment of the Project Site and elevation relative to adjacent roads suggests that ground here has been significantly cut and fill, with little original surface soil remaining.

The potential for cumulative impacts from the Project were also considered.

GPA determined that, "including Rose Hill Courts, there are at least 34 public and private garden apartment complexes in Los Angeles, … (and that many) of the complexes are listed or identified as eligible for listing in a historical resources survey" (2018:30). Rose Hill Courts was one of the first ten projects constructed by HACLA, the others being Ramona Gardens, Pico Gardens, Pueblo del Rio, Rancho San Pedro, Aliso Village, Estrada Courts, William Mead Homes, Avalon Gardens, and Hacienda Village (now Gonzaque Village). HACLA currently has no planned projects for its other garden apartment complexes. Its "Vision Plan" identifies several for possible redevelopment and significant rehabilitation/partial redevelopment based upon the scoring criteria. As the Vision Plan is a long-range plan to preserve and expand affordable housing over the next 25 years, it is reasonably foreseeable that one or more of the HACLA complexes … could be redeveloped, partially redeveloped, and/or significantly rehabilitated" (GPA 2018:30).

GPA Consulting (2018:1) concluded that the proposed project when considered with other potential projects would have a significant cumulative impact on historical resources. Although, as stated above, there are no known related projects involving historical resources within a similar context or property type as Rose Hill Courts, it is reasonably foreseeable that HACLA could redevelop, partially redevelop, or significantly rehabilitate other public housing complexes in the future. If those public housing projects were historical resources, the project could potentially contribute to cumulative impacts on historical resources (GPA Consulting, 2018, p. 1). **Therefore, impacts on historical resources would be significant and cumulatively considerable.**

Archaeological Resources

With regard to potential cumulative impacts related to archaeological resources and human remains, the Project is located in an urbanized area that has been disturbed and developed over time. In the event that archaeological resources are uncovered, each related project would be required to comply with applicable regulatory requirements. In addition, as part of the environmental review process for the related projects, it is expected that mitigation measures would be established as necessary to

address the potential for uncovering archaeological resources. **Therefore, cumulative impacts on archaeological resources would be less than significant and would not be cumulatively considerable.**

Human Remains

No known traditional burial sites or other type of cemetery usage has been identified within the Project Site or in the vicinity. In addition, as previously indicated, the Project Site is developed with 15 buildings. The planned development would require some excavation that would extend into native soils. Thus, the potential exists to encounter human remains during excavation activities. Any of the related projects requiring excavation would also raise the potential to encounter human remains. A number of regulatory provisions address the handling of human remains inadvertently uncovered during excavation activities. These include State Health and Safety Code § 7050.5, PRC § 5097.98, and State CEQA Guidelines § 15064.5(e). Implementation of these provisions in the event of the inadvertent discovery of human remains would reduce potential impacts on a less than significant level. **Since the Project is required to comply with these provisions, its cumulative impacts on human remains would be less than significant**.

4.4.5 Mitigation Measures

Historic Architectural Resources

The following mitigation measures would not fully reduce potentially significant impacts on built environment resources to a less than significant level. Impacts after implementation of mitigation measures below would remain significant and unavoidable.

CUL-1: The Project Applicant shall prepare an interpretive display and install it in the new community building on the redeveloped Rose Hill Courts property. The interpretive display shall be completed to coincide with the opening of the community building once construction is complete. It shall include a brief history of the historic property, its significance in the contexts of public and defense worker housing in Los Angeles during the Second World War and public housing design related to the Garden City and Modern movements, and a description of the Undertaking which led to the demolition of the historic property. The display shall be professionally written, illustrated, and designed. The content shall be prepared by persons meeting the Secretary of the Interior's (SOI) Professional Qualifications Standards for Architectural History. HCID shall ensure that the Project Applicant has satisfactorily completed the interpretive display as described in this stipulation and submit the draft content to SHPO for review and approval. SHPO shall have 30 days to review the interpretive display content before it is produced and installed. (This is PA Stipulation I.A.)

CUL-2: HACLA shall add to its existing website a section dedicated to the history of HACLA and public housing in Los Angeles within six (6) months of completing the Rose Hill Courts Redevelopment Project. The website shall provide content on the history of the agency, the significance of public housing in the City, and notable examples of public housing architecture and site planning. It shall include links to other scholarly sources of information on the history and design of public housing. The new website section shall be professionally written, illustrated, and designed. The content shall be prepared by persons meeting the SOI Professional Qualifications Standards for

Architectural History. HCID shall ensure that HACLA has satisfactorily completed the new website section as described in this stipulation and submit the draft content to SHPO for review and approval. SHPO shall have thirty (30) days to review the content before it is published. Once the new website section is complete, HACLA shall publicize it in its monthly newsletter. (This is PA Stipulation I.B.)

4.4.6 Level of Significance after Mitigation

Historic Architectural Resources

After implementation of **mitigation measures CUL-1** and **CUL-2**, impacts on historical resources would remain significant and unavoidable. Cumulative impacts associated with historical resources would be cumulatively considerable.

Archaeological Resources

With implementation of the Condition of Approval **CUL-COA-1** and compliance with regulatory requirements, these would ensure that impacts on archaeological resources would be less than significant. Cumulative impacts on archaeological resources would be less than significant.

Human Remains

Compliance with regulatory requirements would ensure that impacts on human remains, would be less than significant. Cumulative impacts on human remains would be less than significant.

4.5 Geology and Soils

4.5.1 Introduction

The following discussion addresses existing environmental conditions related to the stability of soils related to seismic hazards and erosion within the Project study area. Additionally, existing laws, regulations, and standards relevant to seismic hazards and soils are described. In some cases, compliance with the existing laws, regulations, and standards would serve to reduce or avoid certain impacts that might occur with implementation of the proposed Project.

The information presented in this section and used for this analysis is from the Geotechnical Investigation Report by Geocon West Inc. (Geocon, 2019; **Appendix J**); while information regarding known geologic conditions, features, and potential hazards was obtained from Seismic Hazard Zone Reports, Fault Evaluation Reports, Soil Surveys and other readily available data from state agencies such as the California Geological Survey (CGS), and federal agencies such as the Natural Resources Conservation Service (NRCS) Web Soil Survey and the U.S. Geological Survey (USGS).

4.5.2 Environmental Setting

4.5.2.1 Regulatory Framework

Federal

<u>Earthquake Hazards Reduction Act of 1977 (Public Law [PL] 95 – 124), as amended</u>

The Earthquake Hazards Reduction Act was passed by Congress in 1977 to "…*reduce the risks of life and property from future earthquakes in the United States through the establishment and maintenance of an effective earthquake hazards reduction program*." This Act led to the establishment of the National Earthquake Hazard Reductions Program (NEHRP). In establishing the NEHRP, Congress recognized that earthquake-related losses could be reduced through improved design and construction methods and practices, land use controls and redevelopment, prediction techniques and early-warning systems, coordinated emergency preparedness plans, and public education and involvement programs (NEHRP, 2018). Congress thoroughly reviewed and updated the Act in 2004, resulting in the NEHRP Reauthorization Act of 2004, PL 108 – 360, which was signed into law the same year. The four primary agencies involved in the NEHRP are:

- Federal Emergency Management Agency (FEMA) of the Department of Homeland Security
- National Institute of Standards and Technology (NIST) of the Department of Commerce
- National Science Foundation (NSF)
- USGS

The NIST is the NEHRP lead agency (NEHRP, 2018).

State

Alquist-Priolo Earthquake Fault Zoning Act (Public Resources Code 2, Division 2, Chapter 7.5 §§ 2625-2630)

Alquist-Priolo Earthquake Fault Zoning Act was enacted in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. The main purpose of Alquist-Priolo is to prevent construction of buildings used for human occupancy on the surface trace of active faults. Before a new project is permitted, cities and counties require a geologic investigation to demonstrate that proposed buildings will not be constructed on active faults. The act addresses only the hazard of surface fault rupture and is not directed toward other earthquake hazards, such as liquefaction or seismically-induced landslides. The law requires the State of California geologist to establish regulatory zones around the surface traces of active faults and to issue appropriate maps. The maps are distributed to all affected cities, counties, and state agencies for their use in planning and controlling new or renewed construction. Local agencies must regulate most development projects within the zones. Projects include all land divisions and most structures for human occupancy (Tetra Tech, 2018).

Seismic Safety Act of 1975

The Seismic Safety Act (CCR §§ 8870 – 8870.95) created a Seismic Safety Commission whose purpose was to report to the Governor annually on the Commission's findings, progress, and recommendations relating to earthquake hazard reduction. The Commission was to include individuals intended to represent the professions of architecture, planning, fire protection, public utilities, electrical engineering, mechanical engineering, structural engineering, soils engineering, geology, seismology, local government, insurance, social services, emergency services, and the Legislature. In 2006, the name of the Seismic Safety Commission was changed to the Alfred E. Alquist Safety Commission (SSC). Much of the Commission's work is carried out by special committees, including:

- Planning & Budget Committee: Provides guidance to the executive director relating to planning, administrative, policy and fiscal issues and make recommendations to the full commission.

- Strong Motion Instrumentation Advisory Committee: Established by law to advise the CGS in the long-term operation and goals of the strong motion instrumentation program, including:

    - Modification and upgrading of existing instrumentation and addition of new recording devices

    - General use and dissemination of data collected by the strong motion instrumentation program

    - Cooperative efforts with other strong motion programs including the USGS

    - Direct application of data for use by engineers in the design of structures and modification of building codes (SSC, 2019).

California Earthquake Hazards Reduction Act of 1986

The California Earthquake Hazards Reduction Act (CCR Title 2 § 8871.1 - 8871.5 et seq.; 1986 Act) is similar in purpose to the federal Earthquake Hazards Reduction Act of 1977, and was enacted by the State of California with the goal of reducing the earthquake hazard within California to "acceptable levels" through a significant reduction in the number of hazardous buildings and expansion of scientific and engineering studies. The 1986 Act established a coordinated program which was allotted the task of specifying priorities, funding sources and amounts, schedules, and other resources needed to significantly reduce earthquake hazards statewide by January 1, 2000. As part of this program, the State Office of Emergency Services was to:

- Establish an interim state operations center in southern California to coordinate response to a major earthquake. The office shall also develop an operational communications plan for the center based upon an inventory of current communications capabilities and an assessment of structural vulnerabilities (7 CCR § 8871.3[a]);

- Undertake a design analysis regarding construction of a permanent state operations center in southern California, including an evaluation of telecommunications and information technology systems for emergency management functions (7 CCR § 8871.3[b]); and

- Integrate and coordinate the California Emergency Services Act (Chapter 7 [commencing with § 8550]), the Disaster Assistance Act (Chapter 7.5 [commencing with § 8680]), the Economic Disaster Act of 1984 (Chapter 7.6 [commencing with § 8695]), the Planning and Zoning Law (Title 7 [commencing with § 65000]), the Community Redevelopment Law (Part 1 [commencing with § 33000] of Division 24 of the Health and Safety Code), and the Community Development Financial Assistance and Disaster Project Law (Part 1.5 [commencing with § 34000] of Division 24 of the Health and Safety Code) (7 CCR § 8871.5[e]).

Seismic Hazards Mapping Act of 1990

The Seismic Hazards Mapping Act of 1990 (Public Resources Code, Chapter 7.8, §§ 2690-2699.6) directs the California Department of Conservation (DOC), CGS, to identify and map areas prone to earthquake hazards of liquefaction, earthquake-induced landslides and amplified ground shaking. The purpose of the Seismic Hazards Mapping Act is to reduce the threat to public safety and to minimize the loss of life and property by identifying and mitigating these seismic hazards.

Staff geologists in the Seismic Hazard Mapping Program gather existing geological, geophysical and geotechnical data from numerous sources to compile the Seismic Hazard Zone Maps. They integrate and interpret these data regionally in order to evaluate the severity of the seismic hazards and designate Zones of Required Investigation for areas prone to liquefaction and earthquake–induced landslides. Cities and counties are then required to use the Seismic Hazard Zone Maps in their land use planning and building permit processes.

Zones of Required Investigation include, in addition to Alquist-Priolo Earthquake Fault Zones, but also areas of liquefaction and earthquake-induced landslides (CGS, 2019a).

Authority for and Scope of General Plans

Title 2 CCR § 65302(g)(1) requires county and city general plans to include "…a safety element for the protection of the community from any unreasonable risks associated with the effects of seismically induced surface rupture, ground shaking, ground failure, tsunami, seiche, and dam failure; slope instability leading to mudslides and landslides; subsidence; liquefaction; and other seismic hazards identified pursuant to Chapter 7.8 (commencing with § 2690) of Division 2 of the Public Resources Code, and other geologic hazards known to the legislative body; flooding; and wildland and urban fires. The safety element shall include mapping of known seismic and other geologic hazards. It shall also address evacuation routes, military installations, peak load water supply requirements, and minimum road widths and clearances around structures, as those items relate to identified fire and geologic hazards."

California State Building Code

The California Building Code (CBC) (24 CCR, contains the regulations that govern the construction of buildings in California. The CBC contains general building design and construction requirements relating to fire and life safety, structural safety, and access compliance. The CBC provides minimum standards to safeguard life or limb, health, property and public welfare by regulating and controlling the design, construction, quality of materials, use and occupancy, location and maintenance of all buildings and structures and certain equipment. Part 2 is pre-assembled with the International Building Code with necessary California amendments. The 2016 CBC, Part 2, Volume 2, Chapter 16 §1613 contains specific seismic design criteria required for "*Every structure, and portion thereof, including nonstructural components that are permanently attached to structures and their supports and attachments, shall be designed and constructed to resist the effects of earthquake motions in accordance with ASCE 7* "(American Society of Civil Engineers "Minimum Design Loads and Associated Criteria for Buildings and Other Structures") with few exceptions (California Building Standards Commission [CBSC], 2016).

The 2016 CBC, Part 2, Volume 2, Chapter 18 §§ 1801 – 181803.7 specifically requires soil investigations, geotechnical reports, and geohazard reports conducted on soils that may be classified as questionable, critically expansive subjected to seismic hazards including expansive soils, or prone to other seismic hazards. The purpose of the subsequent geological technical report *shall be to identify geologic and seismic conditions that may require project mitigations. The reports shall contain data which provide an assessment of the nature of the site and potential for earthquake damage based on appropriate investigations of the regional and site geology, project foundation conditions, and the potential seismic shaking at the site* (CBC § 1803.7).

The Maximum Considered Earthquake Ground Motion is the level of ground motion that has a 2 percent chance of exceedance in 50 years, with a statistical return period of 2,475 years. According to the 2016 CBC and ASCE 7-10, the Maximum Considered Earthquake is to be utilized for the evaluation of liquefaction, lateral spreading, and seismic settlements. The Design Earthquake Ground Motion is the level of ground motion that has a 10 percent chance of exceedance in 50 years, with a statistical return period of 475 years (Geocon, 2019, p. 7).

Special Publication 118, Recommended Criteria for Delineating Seismic Hazard Zones in California

In 1992 (and revised in 2004), the DOC released *Special Publication 118, Recommended Criteria for Delineating Seismic Hazard Zones in California* to assist the CGS in mapping seismic hazard zones

throughout the state (DOC, 2004, pp. 5 - 8). To qualify as an Earthquake-Induced Landslide Hazard Zone, a geographic area must meet one or more of the following criteria:

4. Areas known to have experienced earthquake-induced slope failure during historic earthquakes;

5. Areas identified as having past landslide movement, including both landslide deposits and source areas;

6. Areas where CGS's analysis of geologic and geotechnical data indicate that the geologic materials are susceptible to earthquake-induced slope failure.

Special Bulletin 118 (DOC, 2004) also recommends criteria for mapping Earthquake-Induced Liquefaction Hazard Zones to identify areas where site-specific geotechnical investigations must be conducted to assess liquefaction hazard and, if a hazard exists, provide a technical basis to mitigate that hazard (DOC, 2004, pp. 3 – 5). Liquefaction zones of required investigation (Liquefaction Hazard Zones) are geographic areas that meet one or more of the following criteria:

7. Areas known to have experienced liquefaction during historical earthquakes.

8. Areas of uncompacted fills that are saturated, nearly saturated, or may be expected to become saturated.

9. Areas where analysis of existing data indicate that the soils are potentially liquefiable.

10. Areas where existing subsurface data are not sufficient for quantitative evaluation of liquefaction hazard (DOC, 2004, pgs. 3 - 5).

Local

<u>City of Los Angeles Hazard Mitigation Plan</u>

The City of Los Angeles Hazard Mitigation Plan (HMP) was prepared to *lessen the City's vulnerability to disasters, demonstrate the City's commitment to reducing risks from natural hazards* and *serve as a guide for decision makers as they commit City resources to minimize the effects of natural hazards* (City of Los Angeles, 2018). The HMP integrates existing planning mechanisms such as building and zoning regulations, long-range planning mechanisms, and environmental planning, and conducts a thorough hazard vulnerability analysis, creates community disaster mitigation priorities, and develops subsequent mitigation strategies and projects (Tetra Tech, 2018).

Chapter 9 of the HMP discusses the City's seismic hazard profile, identifies the most vulnerable populations and facilities; Chapter 11 discusses the City's landslide and debris flow hazard profile, and also identifies the most vulnerable populations and facilities. The HMP states that effective seismic hazard and landslide management should include regulation of development in or near existing known faults, landslides or areas of natural instability through codes and ordinances; and through evaluation of options including structure relocation or, where landslides are identified as a threat to critical public structures or infrastructure, landslide stabilization (Tetra Tech, 2018).

Chapter 22 of the HMP discusses mitigation alternatives on the personal, corporate, and government scales. Suggested Government-Scale mitigations alternatives for earthquake hazards include:

- *Locate critical facilities or functions outside hazard areas where possible,*
- *Harden infrastructure, provide redundancy for critical functions, and adopt higher regulatory standards, and*
- *Increase the ability to respond to or be prepared for earthquake hazards.*

Suggested mitigation alternatives for landslide hazards include:

- *Stabilize slopes and reduce weight on top of slopes,*
- *Acquire properties in high-risk landslide areas, and adopt land use policies that prohibit the placement of habitable structures in high-risk landslide areas,*
- *Armor or retrofit critical infrastructure against the impact of landslides or debris flows, and adopt newer regulatory standards for new development within unstable slope areas,*
- *Increase the ability to respond to or be prepared for landslide and debris flow hazards (Tetra Tech, 2018, pgs. 22-5 and 22-7).*

City of Los Angeles General Plan Safety Element

The City of Los Angeles General Plan Safety Element (Safety Element; City of Los Angeles, 1996) recognizes that the City is located in a seismically active region, on old floodplains and mountains created by the movement of earthquake faults, and above both active and presumed inactive earthquake faults. As discussed above, earthquakes often trigger secondary disasters, such as landslides or liquefaction on unstable geologic unit or soil that may be prone to seismic-related ground failure, including landslides, liquefaction, or soil collapse. *"The Safety Element does not set forth plans or policies to address hazards from earthquake or landslide hazards before they occur, but relies on seismic hazard maps produced by the State Geologist pursuant to the Alquist-Priolo Earthquake Fault Zoning Act of 1972 (as amended), as well as seismic design criteria of the California State Building Code. Pre-seismic event land use planning with a view to reconfiguring the devastated areas though post-event changes in land use, intensity of development, etc. generally are not included as programs of this Safety Element. It has been the City's experience that the unpredictability of seismic events, both as to location and damage, renders such planning impractical"* (City of Los Angeles, 1996, p. II-21).

California Public Resources Code § 2699 requires general plan safety elements to consider available seismic hazard maps prepared by the State Geologist pursuant to Alquist-Priolo. Alquist-Priolo requires the State Geologist to map active faults (as defined in Special Publication 42, Revised 2018 (CGS, 2018), areas subject to amplified ground shaking, liquefaction, and landslides; as well as those areas which have the potential for the latter. Consequently, the Seismic Hazard Zone Report for the Los Angeles 7.5-Minute Quadrangle (DMG, 1998) was released in 1998 and the revised official Earthquake Fault Zones Map (Earthquake Zones of Required Investigation, Los Angeles Quadrangle) was released in 2017 (CGS, 2017).

The State of California requires that property sellers or their agents disclose to potential buyers the contents of geotechnical reports, specifically if the property is within an Alquist-Priolo Earthquake Hazard Zone or in an area that has been mapped as having the potential for seismically-induced liquefaction or landslides.

City of Los Angeles Building Code

The City of Los Angeles Building Code is codified in the Los Angeles Municipal Code, Chapter IX, Article I. The purpose of the Los Angeles Building Code is to safeguard life, limb, health, property and public welfare by regulating and controlling the design, construction, quality of materials, use and occupancy, location and maintenance of all buildings and structures erected or to be erected within the city, and by regulating certain grading operations.

Earthwork activities, including grading, are governed by the Los Angeles Building Code, which is contained in Los Angeles Municipal Code (LAMC), Chapter IX, Article 1. Specifically: Section 91. 7006. 7 includes requirements regarding import and export of earth material; § 91.7010 includes regulations pertaining to excavations; § 91.7011 includes requirements for fill materials; § 91.7014 includes general construction requirements, as well as requirements regarding flood and mudflow protection; and § 91.7016 includes regulations for areas that are subject to slides and unstable soils. In addition, § 91.1803 includes specific requirements addressing seismic design, grading, foundation design, geologic investigations and reports, soil and rock testing, and groundwater. The Los Angeles Building Code incorporates by reference the California Building Code, with City amendments for additional requirements. LADBS is responsible for implementing the provisions of the Los Angeles Building Code.

City of Los Angeles Ordinance No. 175790

The City of Los Angeles Ordinance No. 175790 defines the methane mitigation requirements for all projects which fall within the "methane zone" or the "methane buffer zone." The zones have been defined by the City of Los Angeles to include areas of the City which fall within or adjacent to the oil production fields by the Division of Gas and Geothermal Resources. The ordinance requires that each parcel that falls within the methane or methane buffer zone be evaluated for methane concentration and pressure and certified by an approved testing agency. Upon completion and certification, the highest concentration and pressure measured during the investigation determines the "design level" for the project. The ordinance defines five design levels and corresponding mitigation measures for all sites in the methane and methane buffer zones. Level I is the least stringent escalating to Level V as the most stringent "active" methane mitigation. As part of the ordinance, alternatives to the measures specified in the ordinance are permitted with the approval of the City.

Paleontological and Unique Geological Resources

CEQA (13 PRC, 21000 et seq)

Appendix G of the CEQA Guidelines provides guidance relative to significant impacts on paleontological resources, which states that a project could have a potentially significant impact on the environment if it could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Public Resources Code, § 5097.5 (Stats. 1965, c. 1136, p. 2792)

The State of California Public Resources Code (Chapter 1.7), § 5097 and § 30244, includes state level requirements for the assessment and management of paleontological resources. These statutes require reasonable mitigation of adverse impacts to paleontological resources resulting from development on state lands, and define the excavation, destruction, or removal of paleontological "sites" or "features" from public lands without the express permission of the jurisdictional agency as

a misdemeanor. As used in § 5097, "state lands" refers to lands owned by, or under the jurisdiction of, the state or any state agency. "Public lands" is defined as lands owned by, or under the jurisdiction of, the state, or any city, county, district, authority, or public corporation, or any agency thereof. The Project Site is considered public lands since it is owned by HACLA, who is the CEQA lead agency, HCID is the Certifying Agency on behalf of HUD, and implementation of the Project would require approval by the City of Los Angeles. This section prohibits "the excavation or removal of any vertebrate paleontological site...or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands."

City of Los Angeles Conservation Element

The City of Los Angeles Conservation Element, Chapter II, Section 3 (City of Los Angeles, Department of City Planning, 2001), states that the City has a primary responsibility to protect paleontological sites pursuant to CEQA. As such, the City's policy is to identify and protect significant paleontological sites and/or resources known to exist or identified during land development, demolition or property modification activities. The City's General Plan notes that the City is rich in paleontological resources, and discusses the CEQA requirements for excavations if significant paleontological resources are found during construction. Though the General Plan states that "the city has a primary responsibility in protecting significant archaeological and paleontological resources," the Plan does not provide its own regulations for the protection and preservation of prehistoric cultural resources. If land development occurs within a potentially significant paleontological area, the Conservation Element states that "the developer is required to contact a bona fide paleontologist to arrange for assessment of the potential impact and mitigation of potential disruption of or damage to the site." If significant resources are discovered, authorities must be notified and the designated paleontologist may cease construction activity in that portion of the Project Site. This cessation allows time for the assessment, removal or protection of the paleontological resources.

4.5.2.2 Existing Conditions

Regional Geology

The Project Site is located in the Peninsular Range Geomorphic Province, less than five miles south of the southern border of the Transverse Ranges. The Peninsular Ranges Geomorphic Province is comprised of a series of mountain ranges interspersed with long valleys formed by the San Andreas Fault Zone, which also bisects the Transverse Ranges. The Peninsular Range Geomorphic Province stretches from the Los Angeles Basin, San Gabriel Valley and Pomona Valley east toward Palm Springs, and south, crossing the international border and forming the spine of Baja California (Fuller et al., 2015).

Regional Faulting and Seismicity

There are numerous faults in Southern California. Based on criteria established by the California Geological Survey (CGS, 2018), active faults are those that have shown evidence of surface displacement within the past 11,700 years (within Holocene time). Other faults include Pre-Holocene faults: Faults that have not moved in the past 11,700 years, and thus do not meet the criteria of "Holocene-active fault". Other faults are "age-undetermined faults", which are faults where the recency of fault movement has not been determined. However, age-undetermined faults within regulatory Earthquake Fault Zones are considered Holocene-active until proved otherwise (CGS, 2018). The known faults in the vicinity of the Project Site are discussed below.

Active Faults

An earthquake fault, or segments of a fault, is zoned under the Alquist-Priolo Earthquake Fault Zoning Act if the fault is deemed "sufficiently active" and "well-defined", as defined in *Fault-Rupture Hazard Zones in California, Alquist-Priolo Earthquake Fault Zoning Act with Index to Earthquake Fault Zones Maps (Special Publication 42)* (Bryant and Hart, 2007, p. 5). However, according to the Alquist-Priolo Earthquake Fault Zoning Act, only those faults which have direct evidence of movement within the last 11,000 years are required to be zoned. The earthquake fault zones generally extend from 200 to 500 feet on each side of a known active fault and identify areas where potential surface fault rupture along an active fault could prove hazardous. If a site lies within an Earthquake Fault Zone on an official California Geological Survey map, then a geologic fault rupture investigation must be performed before issuance of permits to demonstrate that the proposed development is not threatened by surface displacement from the fault. Regionally active faults are shown on **Figure 4.5-1**. The Project Site is not within a state-designated Alquist-Priolo Earthquake Fault Zone or a city-designated Preliminary Fault Rupture Study Area for surface fault rupture hazards. No active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the site (Geocon, 2018).

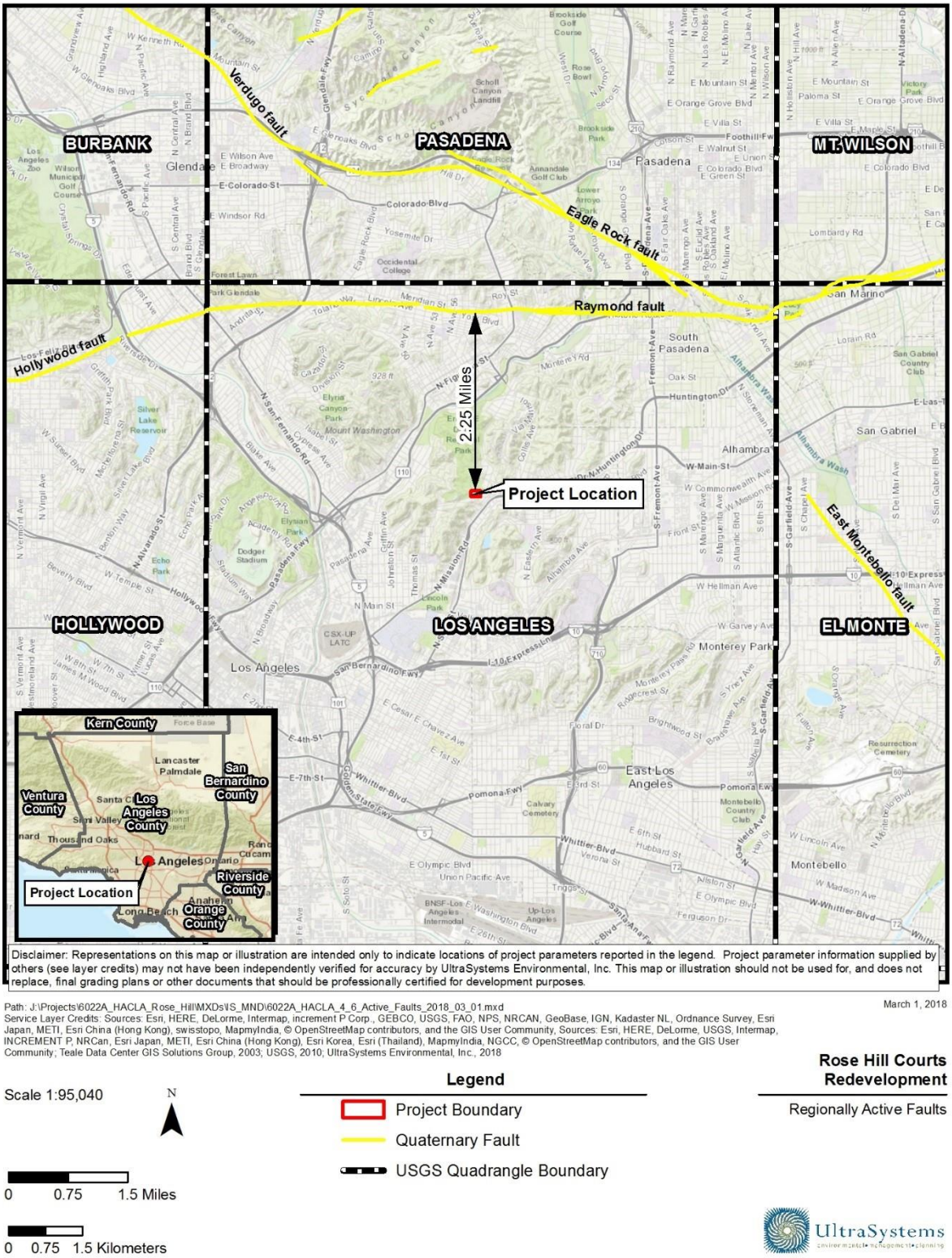
As shown in **Figure 4.5-1,** the Raymond Fault is the closest active fault, located approximately 2.25 miles north of the Project Site. It begins approximately 0.5 mile south of Occidental College in the neighborhood of Eagle Rock and extends eastward as a pair of generally parallel fault traces through Eagle Rock and the City of San Marino, then it trends northward through the community of East Pasadena, the City of Arcadia, and the City of Monrovia where it transitions into the Sierra Madre Fault Zone. The majority of the Raymond Fault has been zoned as active to within approximately 2.5 miles east of the Los Angeles River (as shown in **Figure 4.5-1**), and was determined to meet the criteria of an *Alquist-Priolo Earthquake Fault Zone* on June 15, 2017 (Hernandez, 2017, pg. 42).

The Hollywood Fault System begins in the City of Beverly Hills in the area below the Franklin Canyon Reservoir, and trends eastward, generally paralleling the base of the Santa Monica Mountains passing through the City of Beverly Hills, the City of West Hollywood, the neighborhood of Hollywood, and the northeast Los Angeles area, where it transitions with the Raymond Fault system in the vicinity of Highland Park (see **Figure 4.5-1**). Prior to 1978 the Hollywood Fault was not considered to contain evidence of active Holocene faulting; however, subsequent geological and geotechnical studies, paleoseismic studies, geomorphologic studies, and other published and unpublished research prompted the California Geologic Survey to re-evaluate the evidence for Holocene displacement along the Hollywood Fault. In 2014, this re-evaluation led to the zoning of the principal traces of the Hollywood Fault as *Alquist-Priolo Earthquake Fault Zones* (Hernandez and Treiman, 2014; Hernandez, 2017).

The Eagle Rock Fault is a thrust fault that dips to the northeast, and has a slip rate estimated to be less than 0.1 mm/yr. This fault is approximately seven miles long, and its last known rupture occurred in the late Quaternary period (Wesnousky, 1986 and Bryant, 2017b).

The Verdugo Fault is located approximately five miles northwest of the Project Site. The eastern end of this fault overlaps the western end of the Eagle Rock Fault. The Verdugo Fault is a reverse fault dipping to the northeast. This fault is approximately 16 miles in length and has a slip rate between 0.2 and 1.0 mm/yr, and the most recent known earthquake on this fault occurred less than 10,000 years before present (Wesnousky, 1986, pp. 12,587 – 12,631 and Bryant, 2017a; see **Figure 4.5-1**).

Figure 4.5-1
REGIONALLY ACTIVE FAULTS



The East Montebello Fault, located approximately 4.5 miles east of the Project Site, is a right lateral fault of which little is known (Treiman, 1991). Its most recent prehistoric deformation was in the latest Quaternary (Bryant, 2017c); however, it is likely that this fault is responsible for the magnitude 4.9 Montebello Earthquake in 1999. The initial event was followed 25 minutes later by a magnitude 4.4 aftershock. It has been posited that this earthquake was an aftershock of the Pasadena Earthquake that occurred in December, 1988 along the Raymond Fault (SCEDC, 2013c).

Seismicity

No known, active faults have been mapped across or immediately adjacent to the Project site; however, the Project site is located in the City of Los Angeles, a seismically active city in a seismically active region, where approximately 30 earthquakes of generally low magnitude (below 2.0 on the Richter scale) occur daily. Between 2007 and 2017, two moderate-sized (defined as between magnitude 5.0 and 5.9 on the Richter scale) earthquakes have occurred in the region. On July 29, 2008 a magnitude 5.4 earthquake was centered approximately three miles south of Chino Hills (Hauksson et al., 2008), and on March 29, 2014 a magnitude 5.09 earthquake was centered in the City of La Habra. The most recent major (between magnitude 6.0 and 6.9 on the Richter scale) earthquake that occurred in the greater Los Angeles area was the Northridge Earthquake, which occurred on January 17, 1994, centered approximately 0.6 mile north-northwest of the neighborhood of Reseda in the City of Los Angeles, and which had a magnitude of 6.7 on the Richter scale (SCDEC, 2013a).

Local Geology

Soil Conditions

The proposed Project is in the Repetto Hills (Township 1 South Range 13 West Section 13 NE), which trend northwest to southeast along the northeastern edge of the Los Angeles Basin. The Repetto Hills are composed of folded and faulted Miocene-age sedimentary (i.e., sandstone, mudstone, siltstone, conglomerate) bedrock of the Puente Formation that has been uplifted and incised by elevated floodplains and uplifted alluvial deposits. Miocene-age sedimentary bedrock of the Puente Formation was identified during the geotechnical investigation at depths ranging from 14.5 feet to 47 feet. This bedrock was identified as olive-grey sandstone, siltstone, and silty sandstone and was characterized as being soft (H2) to moderately hard (H3), slightly moist, massive- to thinly bedded, and completely to moderately weathered (Geocon, 2019,[41] p. 3). The proposed Project Site slopes from west to east.

Most of the study area is comprised of Urban land soils, which are generally defined as discontinuous human-transported fill mapped as occurring in varying ratios with other soil types. Only one soil type mapped within the study area does not contain Urban land soils: Ballona-Typic Xerorthents, fine substratum complex, 0 to 5 percent slopes (Soil Survey Staff, 2018). A list of the four soils mapped within the study area is provided in **Table 4.5-1**, and depicted in **Figure 4.5-2**.

The majority of the Project Site is on soils mapped as Urban land-Ballona-Typic Xerorthents, fine substratum complex, 0 to 5 percent slopes (soil unit number 1137). This soil complex is typically found on alluvial fans, but consists mainly of discontinuous human-transported material over young alluvium derived from sedimentary rock (Soil Survey Staff, 2018). Only one soil type mapped within

41 The Geotechnical Investigation by Geocon West Inc. (Geocon) was initially written on May 16, 2018 and was subsequently updated in January 2019. However, the authors did not update the date on the cover of their report. The reference to this report is cited as 2019 to indicate that the updated (January 2019) version of the report is referred to and attached as **Appendix J** to this EIR document.

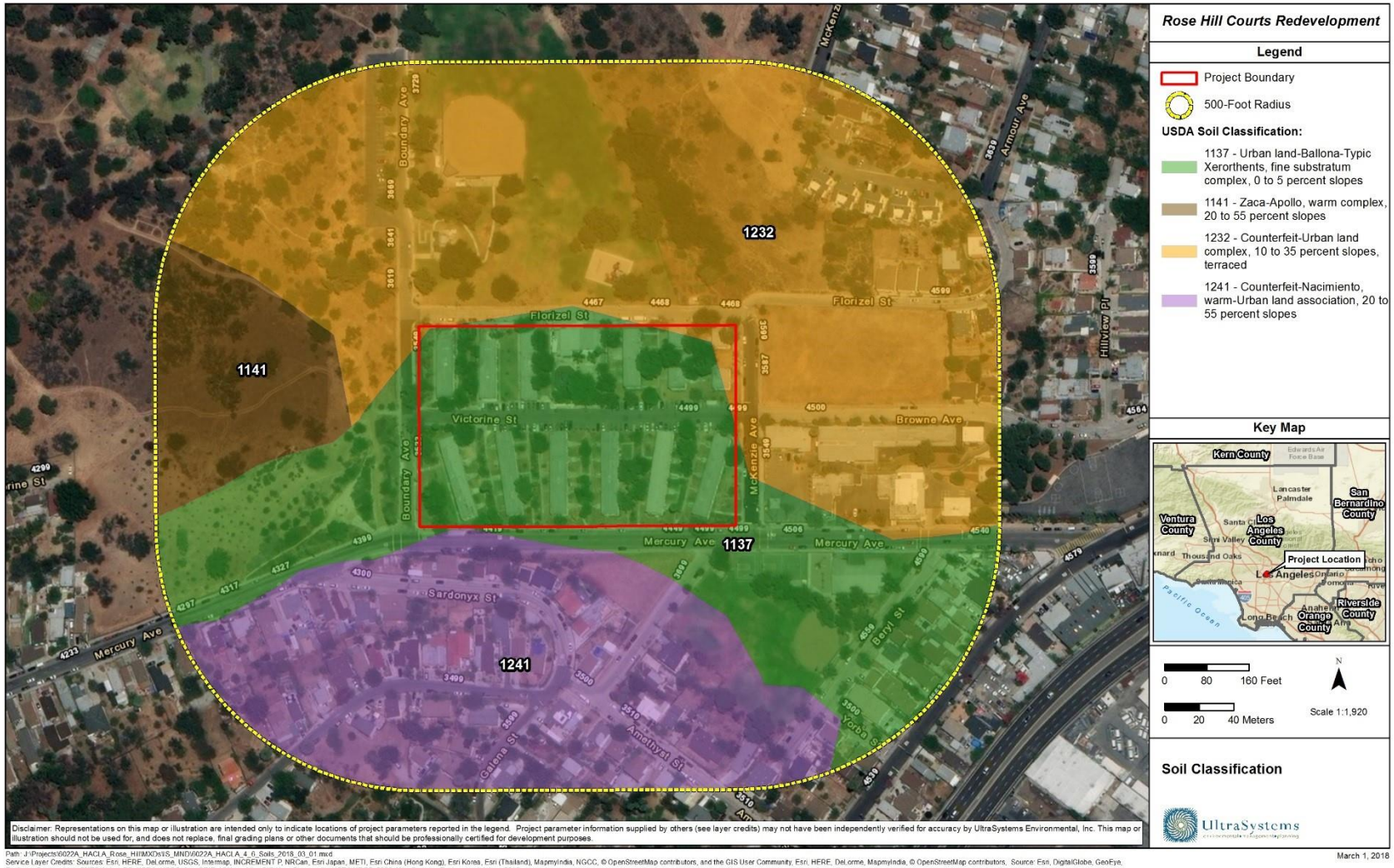
the study area does not contain human-transported material (Urban soil type): Zaca-Apollo, warm complex, 20 to 55 percent slopes (soil unit number 1141). This soil type is mapped on the eastern side of the study area, near the western side of Rose Hill Courts. Both Zaca and Apollo, warm soils are derived from colluvium and/or residuum weathered from sandstone or siltstone, are typically found on hillslopes.

Table 4.5-1
SOILS MAPPED WITHIN THE PROJECT AREA

Map Unit Number	Soil Series Name[1]	Parent Material	Typical Landform	Percent Sand/Silt/Clay	Expansion Potential[1]
1137	Urban land-Ballona-Typic Xerorthents, fine substratum complex, 0 to 5 percent slopes	Ballona: Discontinuous human-transported material. Typic Xerorthents: human-transported material over young alluvium derived from sedimentary rock	Alluvial fans, base slopes	NR[2]/NR/NR	NR
1141	Zaca-Apollo, warm complex, 20 to 55 percent slopes	Colluvium and/or residuum weathered from sandstone and siltstone (both soils).	Hillslopes	14.8/36.4/48.8	High
1232	Counterfeit-Urban land complex, 10 to 35 percent slopes	Counterfeit: Human-transported material consisting mostly of colluvium and/or residuum weathered from sedimentary rock.	Hillslopes	34.0/32.3/33.7	Medium
1241	Counterfeit-Nacimiento, warm-Urban land association, 20 to 55 percent slopes	Counterfeit: Human-transported material consisting mostly of colluvium and/or residuum weathered from sedimentary rock. Nacimiento, warm: Colluvium and/or residuum weathered from sandstone and siltstone.	Hillslopes	34.0/32.3/33.7	Medium

1. Extrapolated from Table 12.2, *Typical Soil Properties and Their Expansion Potential* in Day 2000.
2. NR: Not Rated (or not available).
Source: Soil Survey Staff 2018; Los Angeles County, Southeastern Part, Soil Survey.

Figure 4.5-2
SOILS IN THE PROJECT AREA



Groundwater

An observation well managed by the California Statewide Groundwater Elevation Monitoring Program is located 1.7 miles west of the Project Site; the most recent recorded observation for this well was a depth of 54.7 feet below ground surface measured on March 15, 2018 (DWR, 2019). This observation well is 0.37 mile east of the Los Angeles River, which may influence water levels in the monitoring well.

The Project Geotechnical Investigation Report (Geocon, 2019, p. 4) reported groundwater encountered at depths of 15 feet and 40 feet, and interpreted the groundwater to be perched on top of the less permeable Puente Formation bedrock and not to be signs of a shallow aquifer. Although groundwater levels fluctuate between wet season and dry season and from year to year, Geocon (2019) stated that, due to project design, it is unlikely that groundwater will be encountered during construction.

Landslides and Liquefaction

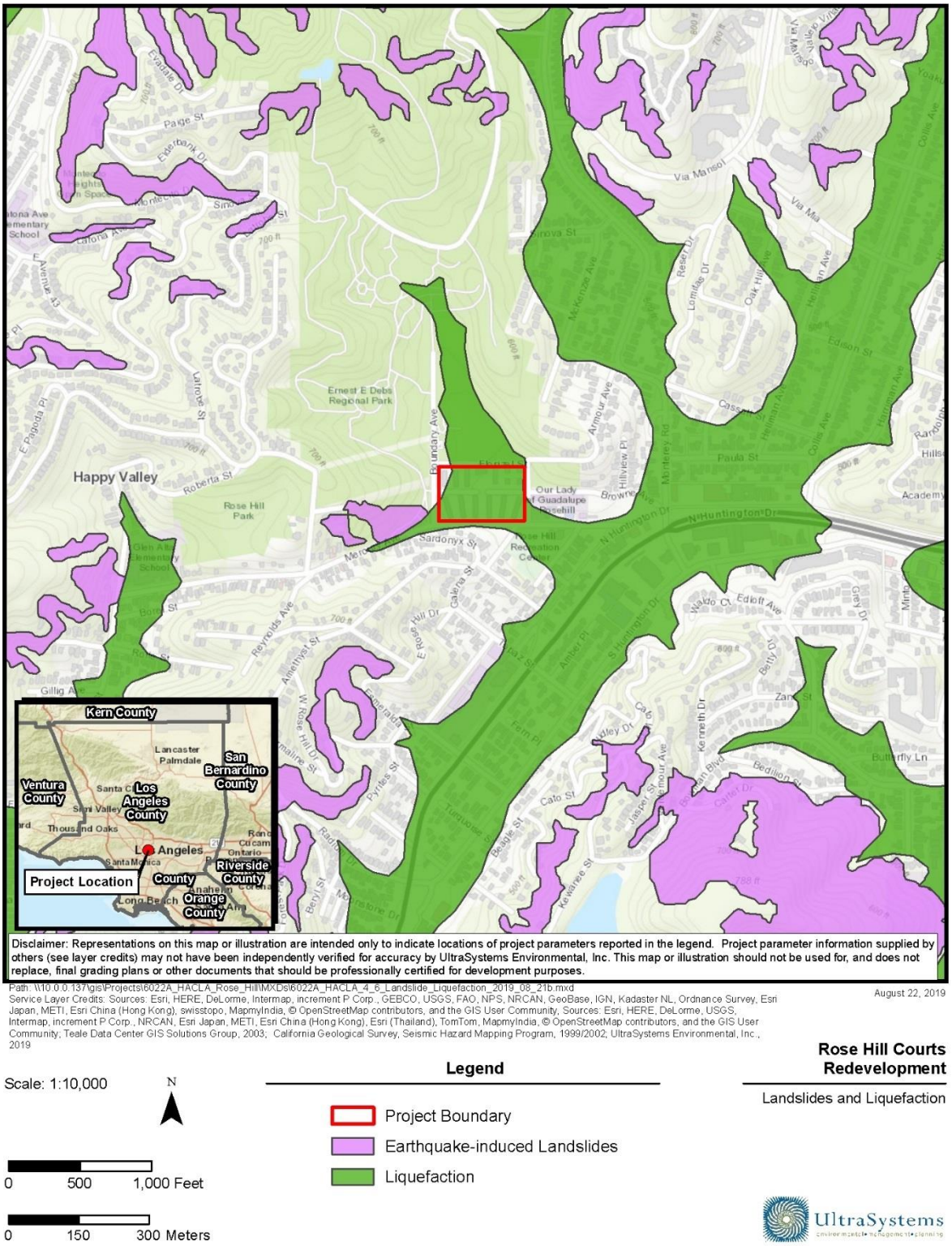
A number of factors affect the amount of damage to structures in an earthquake, but the intensity of ground shaking is of paramount importance. Shaking intensity is affected by the magnitude of the earthquake, its style of faulting, local geologic conditions, proximity to the fault rupture, and the rupture geometry along the fault. The longer ground shaking lasts, the greater the damage to structures, natural slopes, and fills. When strong shaking ceases, there is a reasonable possibility that the damage will not continue. However, if the shaking continues after damage has been initiated, structures will continue to degrade and may eventually collapse. Damage caused by seismically-induced landslides, liquefaction, and other types of ground failure also increases as ground shaking duration increases.

Additionally, areas such as the Project Site that are underlain by soft and unconsolidated soils or soft sedimentary rock (as discussed in **Section 4.5.1.4**) experience greater ground shaking due to amplification of the magnitude of seismic waves by sediments such as those described above (Los Angeles County, 2014, p. 80). The valleys, basins, and alluvial fans within the greater Los Angeles Area are comprised of soft, unconsolidated alluvial soils and therefore may experience greater shaking intensity during an earthquake.

Earthquake-induced landslides and liquefaction-induced ground failure have historically been a significant cause of earthquake damage. In recent history, large earthquakes have triggered landslides that were responsible for destroying or damaging houses and other structures, blocking major transportation corridors, and damaging life-line infrastructure such as water supplies. Areas that are most susceptible to such landslides are steep slopes in poorly cemented or highly fragmented rocks, areas that are underlain by loose, weak soils, including saturated soils, and areas on or adjacent to existing landslide deposits (Silva et al., 1998, p. 18).

As discussed in **Section 4.5.2.1**, in 1992 (and revised in 2004), the DOC released *Special Publication 118, Recommended Criteria for Delineating Seismic Hazard Zones in California* to assist the CGS in mapping seismic hazard zones throughout the state (DOC, 2004, pp. 5 - 8). The CGS has mapped earthquake-induced landslide zones or areas if those areas meet at least one of the criteria set forth in the above guidelines, which were adopted by the DOC in 2004. As shown on **Figure 4.5-3, t**he hillslope adjacent to the west side of Rose Hill Courts, which is bordered by Boundary Avenue on the east and Mercury Avenue on the south, has been mapped as an *Earthquake-Induced Landslide Zone* (Silva et al., 1998).

Figure 4.5-3
LANDSLIDES AND LIQUEFACTION



Disclaimer: Representations on this map or illustration are intended only to indicate locations of project parameters reported in the legend. Project parameter information supplied by others (see layer credits) may not have been independently verified for accuracy by UltraSystems Environmental, Inc. This map or illustration should not be used for, and does not replace, final grading plans or other documents that should be professionally certified for development purposes.

Path: \\10.0.0.137\gis\Projects\6022A_HACLA_Rose_Hill\MXDs\6022A_HACLA_4_6_Landslide_Liquefaction_2019_08_21b.mxd

Service Layer Credits: Sources: Esri, HERE, DeLorme, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community, Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community; Teale Data Center GIS Solutions Group, 2003; California Geological Survey, Seismic Hazard Mapping Program, 1999/2002; UltraSystems Environmental, Inc., 2019

August 22, 2019

Rose Hill Courts Redevelopment

Landslides and Liquefaction

Scale: 1:10,000

N

0 500 1,000 Feet

0 150 300 Meters

Legend

- Project Boundary
- Earthquake-induced Landslides
- Liquefaction

UltraSystems

Most of the Project Site is located in an area mapped by the CGS as a Liquefaction Hazard Zone (**Figure 4.5-3**). From the north, this zone generally follows Huntington Drive southwest through Lincoln Park, branching around USC Medical Center and converging at the I-10/I-5 Interchange and continuing west. At the Rose Hills Recreation Center, an approximate 0.5-mile portion of this liquefication hazard zone breaks off and runs through the Project Site and continues north (CGS, 2017) through what was once a small ravine. This ravine was filled and is now Rose Hill Park.

Subsidence

Subsidence occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. Soils that are particularly subject to subsidence include those with high silt or clay content. The site is not located within an area of known ground subsidence. No known large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at the site or in the general site vicinity. Therefore, the potential for ground subsidence due to withdrawal of fluids or gases at the site is considered low (Geocon, 2019, p. 10).

Expansive Soils

Expansive soils are soils that swell when subjected to moisture and shrink when dried. Expansive soils are typically associated with clayey soils. According to the Geotechnical Investigation (Geocon, 2019, p. 10), the alluvial soils on the Project Site have a low expansion potential. The upper 5 feet of soils encountered during the investigation are considered to have a "low" to "moderate" (EI = 37 and 69) expansive potential and are classified as "expansive" based on the 2016 CBC § 1803.5.3.

Other Geologic Conditions

Corrosive Soils

Geocon (2019, p. 13) performed pH, resistivity, and chloride content testing on a representative sample of soil from the Project Site to generally evaluate the corrosion potential of the soil to surface utilities. Results indicated that the onsite soils are "corrosive" to "severely corrosive" with respect to ferrous materials buried onsite. Tests were also performed to measure the percentage of water-soluble sulfate content to determine the corrosivity of onsite soils to concrete. Results indicated that water soluble sulfate exposure ranges from "negligible" to "moderate" and, therefore, the potential for concrete corrosion in onsite soils is likewise "negligible" to "moderate". Geocon qualifies the latter results by stating that they do not practice in the field of corrosion engineering and mitigation, and recommend that a corrosion engineer be retained prior to construction to evaluate corrosion test results and incorporate any necessary precautions (Geocon, 2019, p. 14).

Two of the soil types mapped on the Project Site (Counterfeit-Urban land complex, 10 to 35 percent slopes, terraced and Counterfeit-Nacimiento, warm-Urban land association, 20 to 55 percent slopes) have been rated by the NRCS as having a moderate risk of corrosion of uncoated steel. A third soil type, Zaca-Apollo, warm complex, 20 to 55 percent slopes, has been rated as having a high risk of corrosion to uncoated steel (Soil Survey Staff, 2019).

Oil Wells

Based on a review of the California Division of Oil, Gas and Geothermal Resources (DOGGR) Well Finder Website, the site is not located within the limits of an oilfield (DOGGR, 2018). See **Figure 4.5-4.** In addition, there are no active or inactive oil or gas wells within a 1-mile radius of the site (Geocon,

2019, p. 10). Therefore, the likelihood of encountering an abandoned oil/gas well during construction is low.

Methane

According to the geotechnical investigation report (Geocon, 2019, p. 10), the Project Site is not located within the boundaries of a city-designated Methane Zone or a Methane Buffer Zone (City of Los Angeles, Bureau of Engineering, Department of Public Works, 2018). Therefore, the potential for the presence of methane or other volatile gases at the site is considered low.

Landform Alteration

No distinct or prominent geologic or topographic features such as hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, or wetlands are located on the Project Site.

Figure 4.5-4
OIL AND GAS WELLS AND FIELDS

Path: J:\Projects\6022A_HACLA_Rose_Hill\MXDs\IS_MND\6022A_HACLA_4_8_Oil_Gas_Wells_and_Fields_2018_03_01.mxd
Service Layer Credits: Sources: Esri, HERE, DeLorme, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), MapmyIndia, NGCC, © OpenStreetMap contributors, and the GIS User Community; CA Dept. of Conservation, June 2016/Dec. 2017; UltraSystems Environmental, Inc., 2018

March 1, 2018

Scale 1:48,000

N

0 2,000 Feet

0 1,000 Meters

Legend

Project Boundary

Oil and Gas Field Boundary

Oil and Gas Well Status:

Buried Well

Idle Well

Plugged & Abandoned

Rose Hill Courts Redevelopment

Oil and Gas Wells and Fields

UltraSystems

Paleontological Resources

The potential for encountering paleontological resources at the Project Site is dependent on the geological deposits that might be exposed. Geological deposits identified at the Project Site are Quaternary Alluvium and Miocene Puente Formation. The geologic map of the Los Angeles 7.5' quadrangle by Yerkes (1997) (**Figure 4.5-5**) shows the central and eastern portion of the Project Site as underlain with Qao soil deposits, and the far western edge with Tpn1 deposits. Qao is identified as "Older alluvium (Late Pleistocene)-Gravel, sand, silt, and clay; moderately to well consolidated, slightly to well cemented; dissected…" and its presence in the Project region is "interpreted as remnants of a system of piedmont alluvial fans that extended through water gaps in the hills" (Yerkes 1997:5). The Tpn1 is identified with the Puente Formation dating to the Upper Miocene and is characterized by "siltstone, well bedded, very fine-grained sandstone, poorly cemented;" (Yerkes 1997:4 and 5).

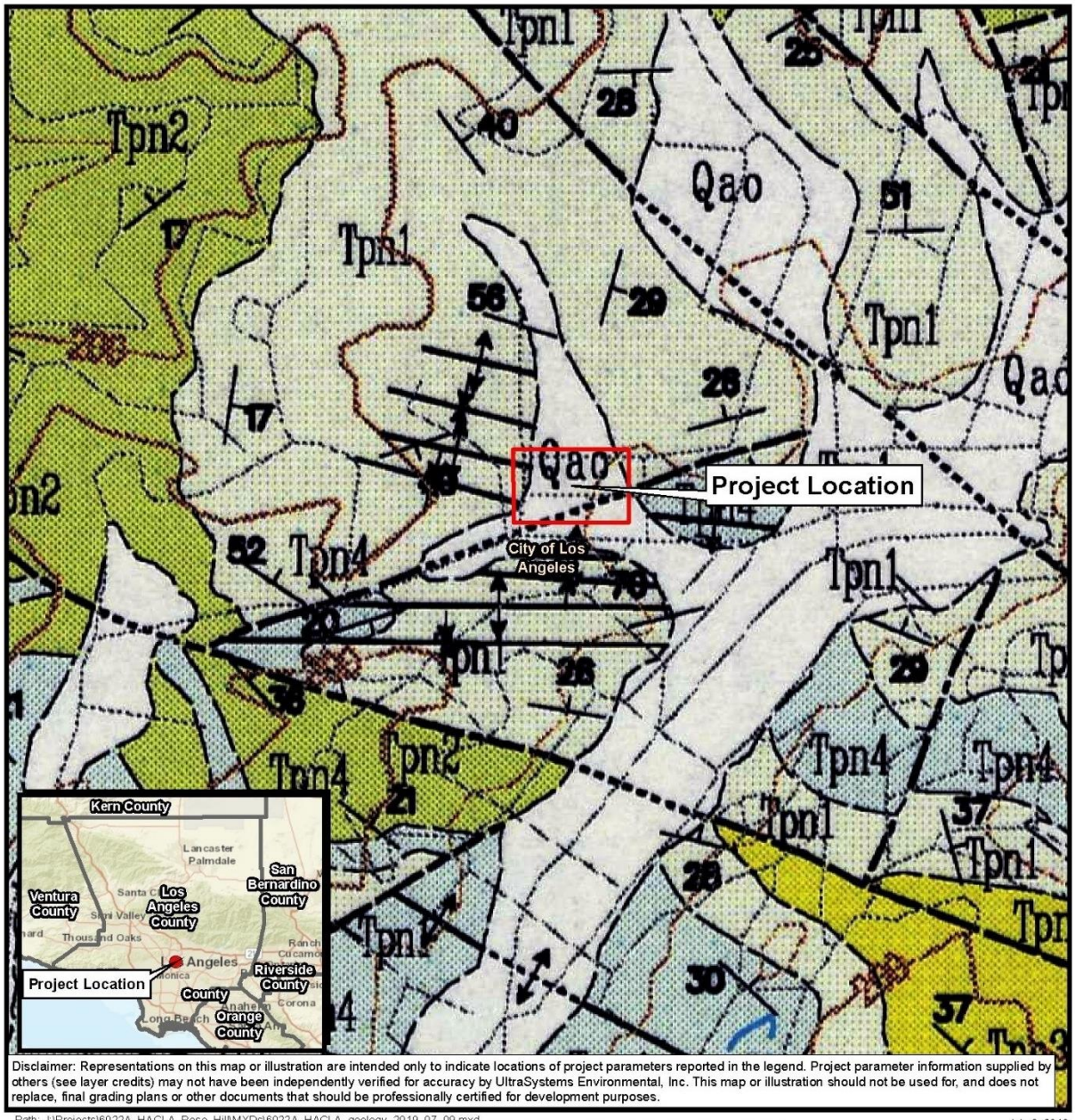
According to the Natural History Museum of Los Angeles County (LACM), Department of Vertebrate Paleontology (McLeod, 2019) (See **Appendix Q**), the lower lying terrain in the western portion of the proposed Project area has surface deposits that consist of younger Quaternary Alluvium, derived as alluvial fan deposits from the surrounding hills. Deposits of younger Quaternary Alluvium "typically do not contain significant vertebrate fossils, at least in the uppermost layers, and we have no localities [of fossil finds] from such deposits anywhere nearby [the Project Site] ... (2019:1)." Conversely, the underlying Puente Formation is described by McLeod as having deposits that "occur at unknown but probably shallow depths in the western portion of the proposed project area…" and that there are "numerous vertebrate fossil localities with in the Puente Formation scattered throughout the area" (2019:2). Six separate localities are described containing various fish and marine mammal fossils at sites ranging from 2.0 miles to the east-northeast, 1.8 miles to the southeast, 0.75 mile to the southwest, and 1.7 miles to the west-northwest (McLeod 2019:2) of the Rose Hill Courts Site. The depth at which these fossils were found is not provided except for locality LACM 7507 where a specimen of a snake mackerel, *Thyrsocles kriegerii* was found in a shaft at a depth of about 100 feet.

McLeod states that:

> Shallow excavations in the younger Quaternary Alluvium exposed in the lower lying terrain in the western portion of the proposed project area are unlikely to uncover any significant vertebrate fossils. Deeper excavations there that extend down into the Puente Formation, or any excavations in the Puente Formation exposed in the elevated terrain in the eastern portion of the proposed project area, however, may well encounter significant to highly significant vertebrate fossil remains. (McLeod 2019:3.)

The City's Invertebrate Paleontological Resource Sensitivity Areas map (**Figure 4.5-6**) show that the central and eastern portions of the Project Site lies within an area identified as "Surface sediments with unknown fossils potential," and shows the far western portion of the Project Site with an area identified as "Bedrock where fossils are likely to be found," a location previously identified with the marine Miocene period as Puente Formation. The City of Los Angeles Vertebrate Paleontological resource Map (**Figure 4.5-7**) does not show any vertebrate paleontological "site area" or "site" in the Project vicinity, the nearest being approximately 1.5 miles to the north and northeast.

Figure 4.5-5
GEOLOGY IN THE PROJECT AREA



Disclaimer: Representations on this map or illustration are intended only to indicate locations of project parameters reported in the legend. Project parameter information supplied by others (see layer credits) may not have been independently verified for accuracy by UltraSystems Environmental, Inc. This map or illustration should not be used for, and does not replace, final grading plans or other documents that should be professionally certified for development purposes.

Path: J:\Projects\6022A_HACLA_Rose_Hill\MXDs\6022A_HACLA_geology_2019_07_09.mxd
Service Layer Credits: Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community; Yerkes, R.F. U.S. Geological Survey OF-97-254, 1997, Preliminary geologic map

July 9, 2019

Scale 1:8,400

N

0 350 700 Feet

0 0.1 0.2 Kilometers

Legend

- Project Boundary
- **Qao:** Older alluvium (Late Pleistocene)
- **Tpn1:** Siltstone/well bedded/very fine-grained sandstone/poorly cemented
- **Tpn2:** Shale/well bedded/siliceous
- **Tpn3:** Diatomaceous shale/interbeds of fine- to coarse-grained sandstone
- **Tpn4:** Sandstone/medium- to coarse-grained/hard and well cemented
- **Tpn** Puente Formation (Upper Miocene)

Rose Hill Courts Redevelopment

Local Geology

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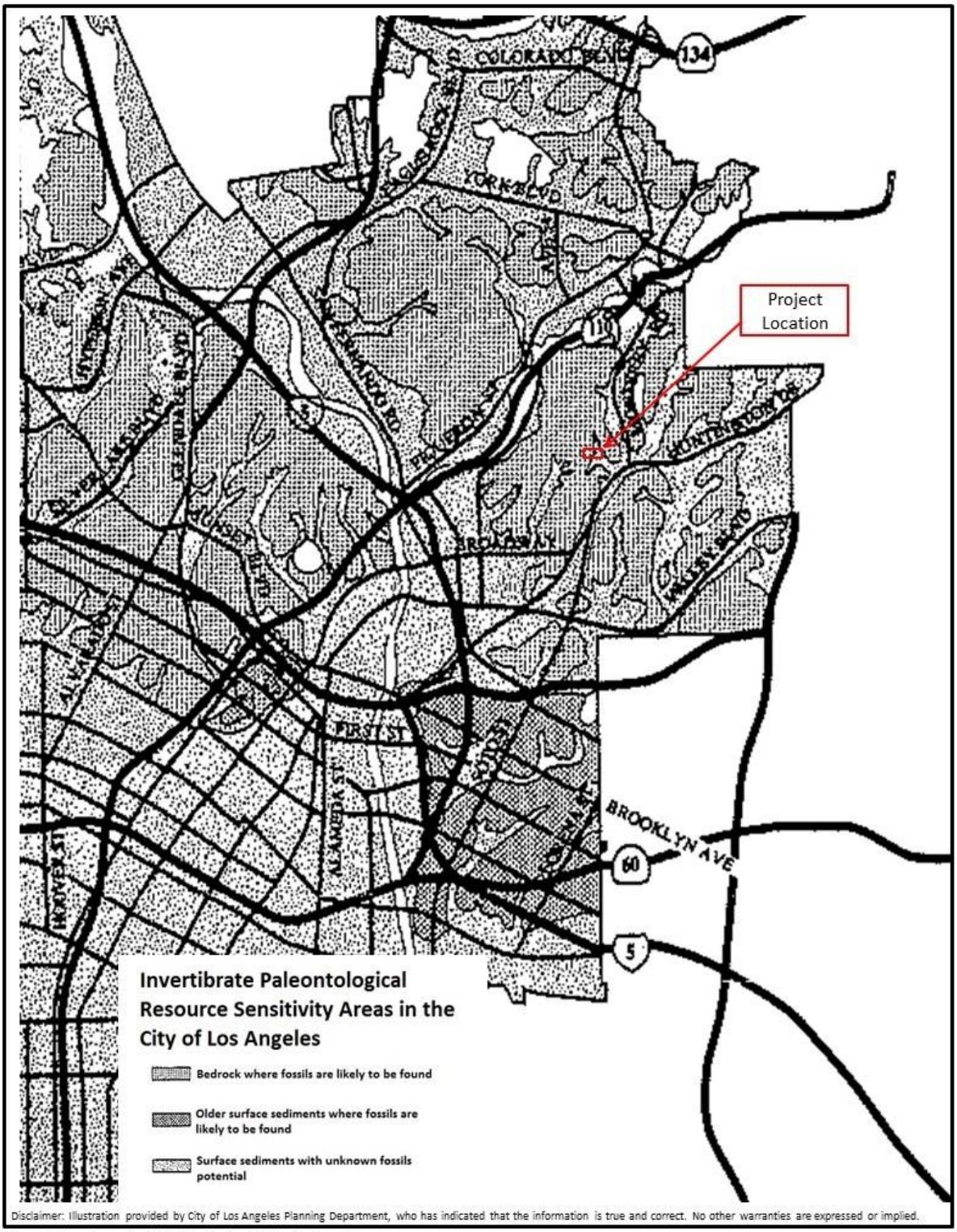
Figure 4.5-6
INVERTEBRATE PALEONTOLOGICAL RESOURCES



Disclaimer: Illustration provided by City of Los Angeles Planning Department, who has indicated that the information is true and correct. No other warranties are expressed or implied.

Source: Envicom Corporation, 1996. City of Los Angeles Citywide General Plan Framework Environmental Impact Report, Figure CR-3.

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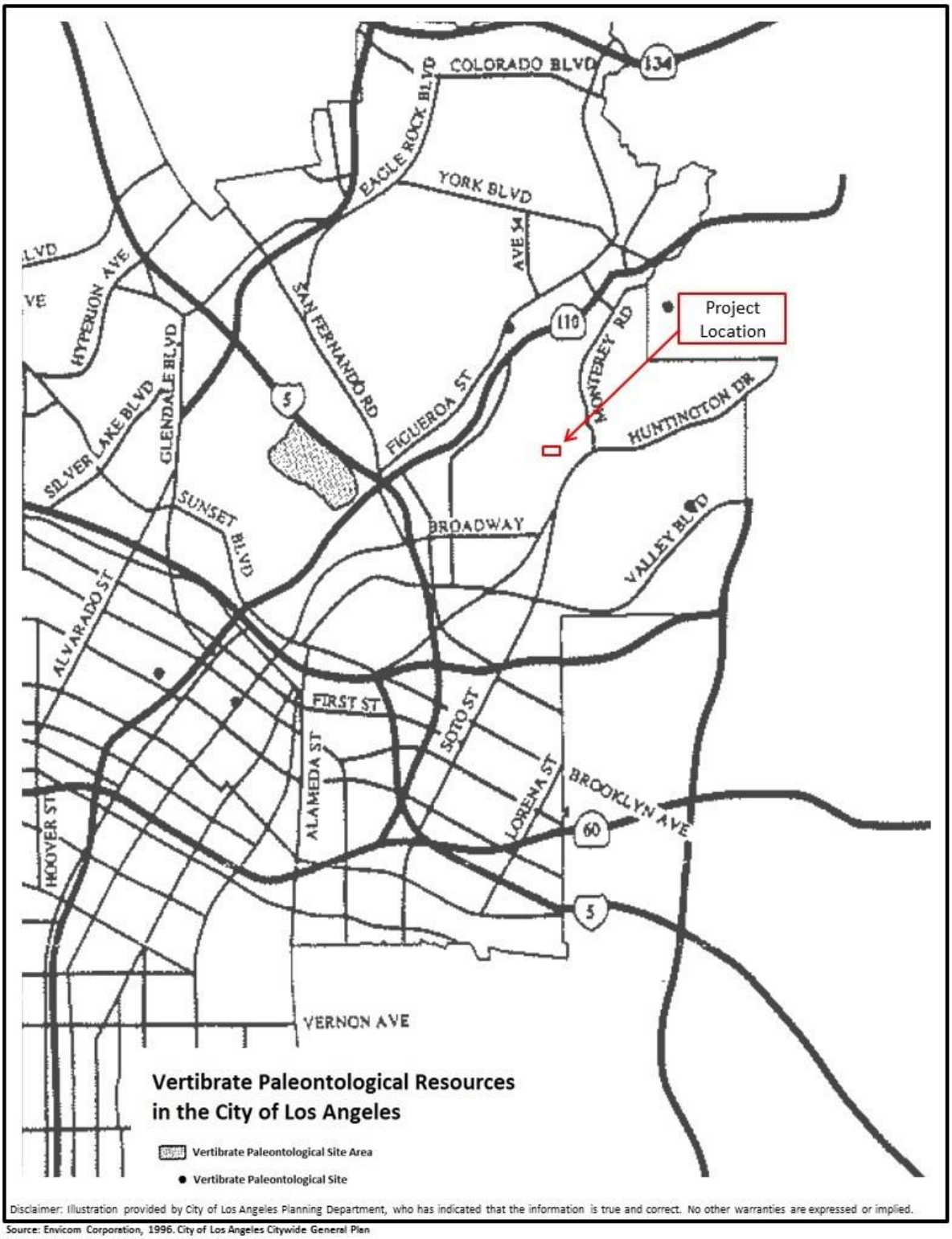
Rose Hill Courts Redevelopment
Invertebrate Paleontological Resource Sensitivity Areas

Figure 4.5-7
VERTEBRATE PALEONTOLOGICAL RESOURCES



Disclaimer: Illustration provided by City of Los Angeles Planning Department, who has indicated that the information is true and correct. No other warranties are expressed or implied.

Source: Envicom Corporation, 1996. City of Los Angeles Citywide General Plan Framework Environmental Impact Report, Figure CR-2.

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Rose Hill Courts Redevelopment
Vertebrate Paleontological Resource Areas

Based on the geotechnical investigation of the Project Site, artificial fill was encountered extending from the surface to depths reaching from 2½ feet to a maximum of 6 feet deep in nine of the 20 borings collected at the Project Site. Of the 20 borings collected, 11 of them did not contain artificial fill but had Pleistocene-age old alluvial valley deposits at the surface. For the borings with artificial fill at the surface, the alluvium was encountered below the artificial fill. Miocene-age sedimentary bedrock of the Puente Formation was encountered starting at depths from 11.5 to 47 feet below the Quaternary Alluvium at four of the boring sites on the Project Site (Geocon, 2019) (see **Appendix J**).

4.5.3 Project Impacts

4.5.3.1 Thresholds of Significance

In accordance with State CEQA Guidelines Appendix G, the project would have a significant impact related to geology and soils if it would:

Threshold (a): ***Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:***

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. Refer to Division of Mines and Geology Special Publication 42.

ii) Strong seismic ground shaking

iii) Seismic-related ground failure, including liquefaction

iv) Landslides

Threshold (b): ***Result in substantial soil erosion or the loss of topsoil; or***

Threshold (c): ***Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or offsite landslide, lateral spreading, subsidence, liquefaction or collapse; or***

Threshold (d): ***Be located on expansive soil, as defined in Table 18-1 B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property; or***

Threshold (e): ***Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water; or***

Threshold (f): ***Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.***

4.5.3.2 Methodology

Geology and Soils

Geotechnical exploration and analysis of the Project Site was conducted by Geocon West, Inc. in 2018 (Geocon, 2019). The purpose of the investigation was to evaluate subsurface soil and geologic conditions underlying the site and, based on conditions encountered, to provide conclusions and recommendations pertaining to the geotechnical aspects of design and construction.

The scope of this investigation included a site reconnaissance, field exploration, laboratory testing, engineering analysis, and the preparation of the geotechnical investigation report included in **Appendix J** of this DEIR. The site was explored on November 17 through 22, 2016, by excavating two 8-inch diameter borings to depths of approximately 26½ and 56½ feet below the existing ground surface utilizing a truck-mounted hollow-stem auger drilling machine (Geocon, 2019). In addition, eleven 4-inch diameter boring to depths 5 to 11 feet below existing ground surface were excavating using hand tools. The site was also explored on April 12 and 13, 2018 by excavating four 8-inch diameter holes to depths of approximately 20½ and 30½ below existing ground surface utilizing a limited access hollow-stem auger-drilling machine. Also, three 4-inch diameter borings were excavated utilizing hand auger equipment to depths of approximately 5 to 15 feet below existing ground surface for percolation testing. The soil conditions encountered in the borings were visually examined, classified and logged in general accordance with the Unified Soil Classification System (Geocon, 2019).

Laboratory tests were performed on selected soil samples obtained during the investigation to determine pertinent physical and chemical soil properties. The approximate locations of the exploratory borings, detailed discussion of the field investigation, boring logs, and a summary of the laboratory test results are presented in the geotechnical investigation report in **Appendix J** of this DEIR.

Project-related impacts can be beneficial in nature or negative, as a direct result of a project or as an indirect result. Impacts can also be permanent or temporary and of short duration. The magnitude of an impact can vary in degree from no change to a complete change in the environment or condition.

Geologic resources that may potentially be impacted by construction and operation of the proposed Project include surface soils that may be subject to erosion by water or wind. Geologic resources that may potentially impact the Project are unstable soils or geologic units that would become unstable as a result of seismic activity. Impact assessments were performed by using GIS to review the Project Site in the contest of various maps of known soils (including soil qualities and properties), seismic hazards (including anticipated shaking levels, liquefaction and earthquake-induced landslide zones, expansive soils, etc.).

Thresholds of Significance from CEQA Appendix G (2019) were used to evaluate the potential level of initial impact and the potential level of impact after implementation of mitigation measures (if mitigation is warranted). Furthermore, the geological setting, regional and local seismic hazards, and local soil properties, qualities, suitabilities, and limitations for use were considered when analyzing Thresholds of Significance and the resulting potential impacts of the proposed Project.

Paleontological Resources

A baseline inventory of potential paleontological resources for the proposed Project Site was based on a review of published and unpublished paleontological and geologic literature and maps (**Figure 4.5-5**) of the Project Site and vicinity, the results of the geotechnical investigation (Geocon, 2019) for the Project Site, and a paleontological archival search at the LACM (McLeod, 2019) which contains collections from the University of California, Los Angeles and the California Institute of Technology. This baseline inventory was used to determine the rock units in the Project Site, to document the respective areal distributions of these rock units, to determine the presence of any previously recorded paleontological sites.

The LACM, Department of Vertebrate Paleontology was contacted by Stephen O'Neil requesting a paleontological records search of the Project Site and surrounding area for known paleontological resources localities and an assessment of the potential for fossiliferous geological soils at the site. Dr. Samuel McLeod responded with a letter report on May 31, 2019 (McLeod, 2019), which is included in **Appendix Q** of this DEIR. Information presented in this section and used for this analysis was derived from this letter report in addition to the following sources: Geotechnical Investigation Report by Geocon West Inc. (Geocon, 2019; **Appendix J**) and paleontological resources sensitivity maps from the City of Los Angeles Citywide General Plan Framework Final EIR (Envicom Corporation, 1996; Section 2.15 Cultural Resources, Figures CR-2 and CR-3 [**Figure 4.5-6** and **Figure 4.5-7**]). Information from these sources and existing conditions of the Project Site were used to determine the potential for finding paleontological resources at the Project Site during construction. This potential rests on the presence of possibly fossiliferous geologic deposits present at the Project Site. The presence and depth of these deposits can be determined by the findings of the soil bore tests described below.

Geocon West, Inc. conducted bore tests at 20 locations scattered throughout the Project Site (Geocon, 2019). Fill, alluvium, and bedrock were encountered at various depths throughout the site. Geocon encountered artificial fill extending from the surface to depths reaching 2½ feet to a maximum depth of 6 feet below existing ground surface in nine out of the 20 borings collected. The fill is likely present as a result of past grading or construction activities at the site. However, deeper fill may exist in other portions of the site that were not investigated. Fill material was not encountered in 11 of the 20 borings collected. Based on the geotechnical investigation of the Project Site, Pleistocene-age old alluvial valley deposits were encountered either beneath the fill material, or at the surface where fill was not present, and Miocene-age sedimentary bedrock of the Puente Formation was encountered in several boring samples (B1, B2, B14 and B17) at depths of 14.5, 47, 11.5, and 15 feet respectively (Geocon, 2019). Boring samples B1 and B17 were collected on the eastern side of the Project Site and boring samples B2 and B 14 were collected on the western half of the Project Site. It may be safely assumed that the Puente Formation underlies the entire Project Site at depths greater than what the remaining 16 test bores reached.

4.5.3.3 Analysis of Project Impacts

Threshold (a): ***Would the Project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:***

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

As discussed above and in the Initial Study prepared for the Project, included as **Appendix B** of this Draft EIR, the Project Site is not located within a state-designated Alquist-Priolo Earthquake Fault Zone or a city-designated Preliminary Fault Rupture Study Area for surface fault rupture hazards. No active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the site. The potential for surface rupture due to faulting occurring beneath the site during the design life of the proposed development is considered low. **Therefore, the Project would have a less-than-significant impact regarding rupture of a known earthquake fault and no mitigation for Threshold (a) i) is required.**

ii) Strong seismic ground shaking?

As discussed above and in the Initial Study prepared for the Project, included as **Appendix B** of this Draft EIR, the Project Site is located within a seismically active region and could be subjected to strong ground shaking in the event of an earthquake. However, according to the Geotechnical Investigation (provided in **Appendix J** of this Draft EIR) prepared for the Project, this hazard is common in Southern California and the effects of ground shaking can be mitigated if the proposed structures are designed and constructed in conformance with current building codes and engineering practices.

The Project would be constructed in accordance with applicable CBC adopted by the legislature and used throughout the state, and requirements from State of California's Department of General Services, Division of the State Architect. Furthermore, as with other development projects in the City, the Project would comply with the Los Angeles Building Code, which incorporates current seismic design provisions of the CBC, with City amendments, to minimize seismic impacts. The CBC incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and maximize earthquake safety.

The Los Angeles Department of Building and Safety is responsible for implementing the provisions of the Los Angeles Building Code, and thus the Project would be required to comply with the plan review and permitting requirements of the Los Angeles Department of Building and Safety, including the recommendations provided in a final, site-specific geotechnical report subject to review and approval by the Los Angeles Department of Building and Safety, as set forth below in mitigation measure **GEO-1**. The final geotechnical report would include the recommendations of the Geotechnical Investigation included in **Appendix J** of this Draft EIR, and its final recommendations would be enforced by the Los Angeles Department of Building and Safety for the construction of the Project. **Through compliance with regulatory requirements, site-specific geotechnical recommendations contained in a final design-level geotechnical engineering report required by mitigation measure GEO-1 below, the Project would not exacerbate existing environmental conditions or cause or accelerate geologic hazards related to strong seismic ground shaking, which could result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. Therefore, impacts related to Threshold (a) ii) would be less than significant.**

iii) Seismic-related ground failure, including liquefaction?

As discussed above and in the Initial Study prepared for the Project, included as **Appendix B** of this Draft EIR, the State of California Seismic Hazard Zone Map for the Los Angeles Quadrangle indicates that the majority of the site is located within a zone of required investigation for liquefaction (See **Figure 4.5-3**). As discussed in the Geotechnical Investigation (provided in **Appendix J** of this Draft

EIR), a liquefaction analysis was performed for borings B1 and B2 at the Project Site for both the Design Earthquake level and the Maximum Considered Earthquake level. For a Design Earthquake level, a historic high groundwater table of 20 feet below the ground surface, a magnitude 6.62 earthquake, and a peak horizontal acceleration of 0.702g (which is ⅔ of the Maximum Considered Earthquake peak ground acceleration or PGA_M) were used for the liquefaction analysis. The results indicate that the alluvial soils below the historic high groundwater level are not susceptible to liquefaction settlement during Design Earthquake ground motion. For a Maximum Considered Earthquake level, a historic high groundwater table of 20 feet below the ground surface, a magnitude 6.61 earthquake, and a peak horizontal acceleration of 1.053g (PGA_M) were used for the liquefaction analysis. The results indicate that the alluvial soils below the historic high groundwater level are also not susceptible to liquefaction settlement during Maximum Considered Earthquake ground motion.

Seismically-induced settlement may occur if an earthquake causes the dynamic compaction of dry and loose sands. Typically, settlements occur in thick beds of such soils. As detailed in the Geotechnical Investigation Report (**Appendix J**), a seismically-induced settlement analysis was performed in accordance with the American Society of Civil Engineers, Technical Engineering and Design Guides as adapted from the US Army Corps of Engineers, No. 9. The calculations for borings B1 and B2 indicate that the soil above the historic high groundwater level of 20 feet could be susceptible to approximately 0.11 and 0.14 inch, respectively, of settlement as a result of the Design Earthquake level peak ground acceleration ($\frac{2}{3}PGA_M$) and could be susceptible to approximately 0.39 and 0.38 inches, respectively, of settlement as a result of the Maximum Considered Earthquake level peak ground acceleration (PGA_M). Differential settlement at the foundation level is anticipated to be less than 0.1 inch over a distance of 20 feet (Geocon, 2019, p. 9 and 11).

According to the Geotechnical Investigation Report (**Appendix J**), the existing fill at the Project Site, in its present condition, is not suitable for direct support of proposed foundations or slabs. Furthermore, paving constructed over existing uncertified fill or unsuitable soils may experience increased settlement and/or cracking, and may therefore have a shorter design life. As recommended in the Geotechnical Investigation, the upper 5 feet of existing earth materials in the building footprint areas would be excavated and properly compacted for foundation and slab support. Deeper excavations would be conducted as needed to remove any encountered fill or soft soils as necessary at the direction of the Geotechnical Engineer. Proposed building foundations would be underlain by a minimum of 3 feet of newly placed engineered fill. For paved areas, at a minimum, the upper 12 inches of soil would be scarified and properly compacted.

As required by the California State Building Code (Title 24), the structural engineer would evaluate the proposed structure for the anticipated seismically-induced settlements and verify that anticipated deformations would not cause the foundation system to lose the ability to support the gravity loads and/or cause collapse of the structure. Seismic building code requirements such as this utilize information gained by many institutional, state, and federal agencies since the 1994 Northridge Earthquake and subsequent earthquakes and, when implemented, reduce potential impacts due to settlement to less than significant.

As stated above, the Project would be required to comply with the plan review and permitting requirements of the Los Angeles Department of Building and Safety, including the recommendations provided in a final, site-specific geotechnical report subject to review and approval by the Los Angeles Department of Building and Safety, as set forth below in mitigation measure **GEO-1**. The final recommendations from that report would be enforced for the construction of the Project. The Project would also be required to comply with the permitting requirements of the Los Angeles Building Code,

which incorporates current seismic design provisions of the CBC, with City amendments, to minimize seismic impacts. **Therefore, with implementation of** mitigation measure **GEO-1, the Project would have a less-than-significant impact regarding seismic-related ground failure including liquefaction.**

iv) Landslides?

As discussed above and in the Initial Study prepared for the Project, included as **Appendix B** of this Draft EIR, the area just west of the Project Site is mapped as an earthquake-induced landslide zone (see **Figure 4.5-3**), however, the topography within the Project Site is relatively flat. The site slopes to the southeast at a gradient flatter than 5:1 (H: V). The site is located within a City of Los Angeles Hillside Grading Area and a Hillside Ordinance Area. However, the site is not located within an area identified as having a potential for seismic slope instability by the state of California. There are no known landslides near the site, nor is the site in the path of any known or potential landslides. Therefore, the probability of slope stability hazards affecting the site is considered very low (refer to **Appendix J,** Geotechnical Investigation of this Draft EIR). **Therefore, the Project would have a less-than-significant impact regarding landslides and no mitigation for Threshold (a) iv) is required.**

Threshold (b): Would the Project result in substantial soil erosion or the loss of topsoil?

The soil mapped on the majority of the Project Site is *Urban land-Ballona-Typic Xerorthents, fine substratum complex, 0 to 5 percent slopes* (Map unit 1137; Soil Survey Staff, 2017). This soil type is comprised of discontinuous human-transported material placed over young alluvium derived from sedimentary rock – i.e., fill material imported during construction of the existing homes on the Project Site to create a level surface on which to build.

This soil type has not been rated for wind or water erodibility by the NRCS Soil Survey, and therefore determinations cannot be made regarding its potential wind or water erodibility. However, during construction of the Project, wind and water erosion would be minimized by implementation of best management practices, described in the required SWPPP, that are intended specifically to avoid or minimize erosion by wind and water during the construction process to maintain compliance with the required Construction General Permit (Order 2009-009-DWQ, as amended). **Potential impacts resulting from wind and water erosion during construction would therefore be less than significant.**

Upon completion of the Project, the Project Site would be covered by permeable and impervious surfaces (e.g., new apartments, parking areas, walkways) and the remainder would be covered in landscape vegetation, all of which would prevent or minimize the potential for wind and water erosion. **The post-construction impact resulting from wind and water erosion would be less than significant.**

Based on the discussion above, Project impacts related to soil erosion during Project construction and operation would be less than significant.

Threshold (c): Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?

Slope Stability/Landslide: The Project's potential impacts associated with landslides are addressed above in Threshold (a)iv). The topography within the Project Site is relatively flat. Topography at the site slopes to the southeast at a gradient flatter than 5:1 (H:V). The Project Site is located within a City of Los Angeles Hillside Grading Area and a Hillside Ordinance Area (City of Los Angeles, 2018). However, the site is not located within an area identified as having a potential for seismic slope instability by the State of California (CDMG, 1999; CGS, 2017), and there are no known landslides near the site, nor is the site in the path of any known or potential landslides (Geocon, 2019). **Therefore, the probability of slope stability hazards (i.e., landslides) affecting the site is less than significant** (Geocon, 2019, p. 9).

Lateral Spreading: Lateral spreading is the downslope movement of surface sediment due to liquefaction in a subsurface layer. The downslope movement is due to gravity and earthquake shaking combined. Lateral spreading of the ground surface during a seismic activity usually occurs along the weak shear zones within a liquefiable soil layer and has been observed to generally take place toward a free face (i.e., retaining wall, slope, or channel) and to lesser extent on ground surfaces with a very gentle slope. **Results of the tests conducted on the soils contained in the onsite borings indicate that the potential for liquefaction is less than significant** (Geocon, 2019, p. 8). **Therefore, impacts due to lateral spreading would also be less than significant.**

Subsidence: As previously discussed, subsidence occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. Soils that are particularly subject to subsidence include those with high silt or clay content. The site is not located within an area of known ground subsidence. No known large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at the site or in the general site vicinity. **Therefore, the potential for ground subsidence due to withdrawal of fluids or gases at the site is considered low and impacts due to subsidence would be less than significant** (Geocon, 2019, p. 10).

Liquefaction Settlement: The Project's potential impacts associated with liquefaction are addressed above in Threshold (a)iii). Liquefaction is a phenomenon in which loose, saturated, relatively cohesionless soil deposits lose shear strength during strong ground motions. Primary factors controlling liquefaction include intensity and duration of ground motion, gradation characteristics of the subsurface soils, in-situ stress conditions, and the depth to groundwater. Liquefaction is typified by a loss of shear strength in the liquefied layers due to rapid increases in pore water pressure generated by earthquake accelerations (Geocon, 2019, p. 7). As discussed previously, results of the liquefaction analysis indicated that the alluvial soils below the historic high groundwater level are not susceptible to liquefaction settlement during either Design Earthquake ground motion or Maximum Considered Earthquake ground motion.

Seismically-induced settlement. The Project's potential impacts associated with seismically-induced settlement is also addressed above in Threshold (a)iii). Seismically-induced settlement may occur if an earthquake causes the dynamic compaction of dry and loose sands. The seismically-induced settlement analysis indicated that the soil above the historic high groundwater level of 20 feet could be susceptible to approximately 0.11 and 0.14 inch, respectively, of settlement as a result of the

Design Earthquake level peak ground acceleration and could be susceptible to approximately 0.39 and 0.38 inches, respectively, of settlement as a result of the Maximum Considered Earthquake level peak ground acceleration. Differential settlement at the foundation level is anticipated to be less than 0.1 inch over a distance of 20 feet (Geocon, 2019, p. 9 and 11).

According to the Geotechnical Investigation Report (**Appendix J**), the existing fill at the Project Site, in its present condition, is not suitable for direct support of proposed foundations or slabs. Furthermore, paving constructed over existing uncertified fill or unsuitable soils may experience increased settlement and/or cracking, and may therefore have a shorter design life. As recommended in the Geotechnical Investigation, the upper 5 feet of existing earth materials in the building footprint areas would be excavated and properly compacted for foundation and slab support. Deeper excavations would be conducted as needed to remove any encountered fill or soft soils as necessary at the direction of the Geotechnical Engineer. Proposed building foundations would be underlain by a minimum of 3 feet of newly placed engineered fill. For paved areas, at a minimum, the upper 12 inches of soil would be scarified and properly compacted.

As stated above, the Project would be required to comply with the plan review and permitting requirements of the Los Angeles Department of Building and Safety, including the recommendations provided in a final, site-specific geotechnical report subject to review and approval by the Los Angeles Department of Building and Safety, as set forth below in mitigation measure **GEO-1.** The final recommendations from that report would be enforced for the construction of the Project. The Project would also be required to comply with the permitting requirements of the Los Angeles Building Code, which incorporates current seismic design provisions of the CBC, with City amendments, to minimize seismic impacts. As such, with the implementation of mitigation measure **GEO-1**, impacts associated with liquefaction settlement or seismically-induced settlement would be reduced to a less than significant level.

<u>Collapsible Soils.</u> Collapsible soils consist of loose, dry, low-density materials that collapse and compact under the addition of water or excessive loading. Soil collapse occurs when the land surface is saturated at depths greater than those reached by typical rain events. As discussed above, the majority of the Project Site is on soils mapped as Urban land-Ballona-Typic Xerorthents, fine substratum complex, 0 to 5 percent slopes. This soil complex is typically found on alluvial fans, but consists mainly of discontinuous human-transported material over young alluvium derived from sedimentary rock (Soil Survey Staff, 2018). As discussed in the Geotechnical Investigation Report (**Appendix J**), the site is underlain by artificial fill, Pleistocene age alluvial valley deposits, and Miocene age sedimentary bedrock of the Puente Formation. The artificial fill generally consists of silty sand, sandy silt, and clayey silt. Pleistocene age-old alluvial valley deposits consist primarily of clayey silt, silt, sandy silt, silt with sand, sand with silt, and silty sand. The alluvial soils are mostly fine-grained and characterized as dry to wet, firm to hard or medium dense to very dense. Based on the type and density of the soils underlying the Project Site, the Project Site soils would not be considered collapsible soils. The historically highest groundwater level in the area is approximately 20 feet beneath the ground surface but Perched groundwater was encountered in borings B1, B2, and B17 at depths of 15, 40, and 15 feet below ground surface respectively. The groundwater is interpreted to be perched on top of the less permeable Puente Formation bedrock. Based on the presence of only perched groundwater in the soil borings, the reported historic high ground water level in the area (CDMG, 1998), and the depth of the proposed construction, it is unlikely that groundwater will be encountered during construction. However, it is common for groundwater to seasonally occur in the area or for groundwater conditions to develop where none previously existed, especially in impermeable fine-grained soils which are heavily irrigated or after seasonal rainfall. In

addition, recent requirements for stormwater infiltration could result in shallower seepage conditions in the immediate site vicinity. Proper surface drainage of irrigation and precipitation will be critical for future performance of the project. Recommendations for drainage were provided in the Geotechnical Investigation Report included in **Appendix J**,

As stated above, the Project would be required to comply with the plan review and permitting requirements of the Los Angeles Department of Building and Safety, including the recommendations provided in a final, site-specific geotechnical report subject to review and approval by the Los Angeles Department of Building and Safety, as set forth below in mitigation measure **GEO-1.** The final recommendations from that report would be enforced for the construction of the Project. The Project would also be required to comply with the permitting requirements of the Los Angeles Building Code, which incorporates current seismic design provisions of the CBC, with City amendments, to minimize seismic impacts. **As such, with the implementation of mitigation measure GEO-1, impacts associated with potential collapse would be reduced to a less than significant level.**

Based on the discussion above, and with the implementation of mitigation measure GEO-1, Project impacts regarding location on unstable soils, landslides, lateral spreading, subsidence, liquefaction or collapse would be less than significant.

Threshold (d): ***Would the Project be located on expansive soil, as defined in Table 18-1 B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?***

Expansive soils shrink and swell with changes in soil moisture. Soil moisture may change from landscape irrigation, rainfall, and utility leakage. The upper 5 feet of soils encountered during the geotechnical investigation are considered to have a "low" to "moderate" (EI = 37 and 69) expansive potential and are classified as "expansive" based on the 2016 CBC § 1803.5.3 (Geocon, 2019, p. 13).

According to the Geotechnical Investigation Report (**Appendix J**), the existing fill at the Project Site, in its present condition, is not suitable for direct support of proposed foundations or slabs. Furthermore, paving constructed over existing uncertified fill or unsuitable soils may experience increased settlement and/or cracking, and may therefore have a shorter design life. As recommended in the Geotechnical Investigation, the upper 5 feet of existing earth materials in the building footprint areas would be excavated and properly compacted for foundation and slab support. Deeper excavations would be conducted as needed to remove any encountered fill or soft soils as necessary at the direction of the Geotechnical Engineer. Proposed building foundations would be underlain by a minimum of 3 feet of newly placed engineered fill. For paved areas, at a minimum, the upper 12 inches of soil would be scarified and properly compacted. Due to the expansive potential of the subgrade soils, the moisture content in the slab and foundation subgrade should be maintained at 2 percent above optimum moisture content prior to and at the time of concrete placement.

The 2016 CBC § 1808.6 specifies design requirements for buildings constructed on expansive soils. To be in compliance with the 2016 CBC and gain approval of Project building plans, the Project applicant would be required by the City of Los Angeles to design all building foundations as required by CBC § 1808.6. As stated above, the Project would be required to comply with the plan review and permitting requirements of the Los Angeles Department of Building and Safety and Los Angeles Building Code, including the recommendations provided in a final, site-specific geotechnical report subject to review and approval by the Los Angeles Department of Building and Safety, as set forth below in mitigation measure **GEO-1.** The final recommendations from that report would be enforced for the construction of the Project, and in doing so direct and indirect impacts related to expansive

soils would be reduced to less than significant. **Therefore, with implementation of mitigation measure GEO-1, Project impacts associated with location on expansive soils would be less than significant.**

Threshold (e): ***Would the Project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?***

As discussed in the Initial Study prepared for the Project, included as **Appendix B** of this Draft EIR, the Project would not include septic tanks or alternative waste water disposal systems. **Therefore, no impacts associated with septic tanks or alternative waste water disposal systems would occur and no mitigation for Threshold (e) is required.**

Threshold (f): ***Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?***

As discussed previously, the potential for encountering paleontological resources at the Project Site is dependent on the geological deposits that might be exposed. The geologic map of the Los Angeles 7.5' quadrangle by Yerkes (1997) (**Figure 4.5-5**) shows the central and eastern portion of the Project Site as underlain with Older alluvium (Late Pleistocene)-soil deposits, and the far western edge with Upper Miocene Puente Formation (Yerkes, 1997). This is in agreement with both the geotechnical report which identified the upper layer of soil as Alluvium and that below the alluvium the borings encountered Puente Formation "Siltstone" (Geocon 2018). McLeod (2019) described the same two geologic deposits for the Project. The geologic map of the Los Angeles quadrangle can be recognized as the underlying source for the invertebrate fossil sensitivity map (**Figure 4.5-6**), on which the area marked for "surface sediments with unknown fossils potential" can be correlated with Qao (Older alluvium) soils, and the area marked for "bedrock where fossils are likely to be found" can be correlated to the Tpn1 (Puente Formation).

According to the LACM, Department of Vertebrate Paleontology (McLeod, 2019:1) (see **Appendix Q**), shallow excavations in the younger Quaternary Alluvium in the western portion of the Project Site are unlikely to uncover any significant vertebrate fossils. However, deeper excavations that extend down into the Puente Formation, or any excavations in the Puente Formation exposed in the elevated terrain in the eastern portion of the Project Site may encounter significant to highly significant vertebrate fossil remains (McLeod 2019:3).

The geotechnical investigation encountered artificial fill extending from the surface to depths reaching 2½ feet to a maximum of 6 feet deep in nine of the 20 borings collected at the Project Site. Of the 20 borings collected, 11 of them did not have artificial fill but had Pleistocene-age old alluvial valley deposits at the surface. For the borings with artificial fill at the surface, the alluvium was encountered below the artificial fill. Miocene-age sedimentary bedrock of the Puente Formation was encountered starting at depths from 11.5 to 47 feet below the Quaternary Alluvium at four of the boring sites on the Project Site (Geocon, 2019) (see Figure 2 in **Appendix J**). According to the geological investigation report (Geocon, 2019: 12), excavations up to 12 feet in vertical height may be required for construction of structures tucked into existing slopes, including foundation and would require sloping and/or shoring measures in order to provide a stable excavation.

According to the Excavation Study for the Project (Fuscoe Engineering, 2019) included in **Appendix E** of this Draft EIR, the maximum depths of excavation for the Project would range from 8.7 feet for construction of Building E (in the southwestern portion of the Project Site) and for the

infiltration gallery (at the northeast portion of the Project Site) to 29.8 feet for construction of Building C (at the northwest portion of the Project Site). As seen on Figure 2 of the geological investigation report (Geocon, 2019), boring sample B14 is located between proposed buildings B and C. The Puente Formation was encountered at 11.5 feet in B14 and the maximum excavation depths for construction of buildings B and C are 16.7 feet and 29.8 feet, respectively. The Puente Formation was also encountered at 15 feet in boring samples B1 and B17 in the eastern portion of the Project Site. Based on the planned depths of excavation on the Project Site and the potential for significant to highly significant vertebrate fossil remains to be encountered within the Puente Formation, construction of the proposed Project may result in potentially significant impacts to paleontological resources. Based on these findings, McLeod provided the following recommendations to mitigate potential Project impacts:

> …any substantial excavations in the proposed project area, therefore, should be monitored closely to quickly and professionally recover any fossil remains discovered while not impeding development. Also, sediment samples should be collected and processed to determine their small fossil potential. Any fossils recovered during mitigation should be deposited in an accredited and permanent scientific institution for the benefit of current and future generations. (McLeod, 2019) (see **Appendix Q**)

With the implementation of recommended mitigation measure PALEO-1, presented below in Section 4.5.5, impacts to paleontological resources from construction of the Project would be reduced to less than significant.

4.5.4 Cumulative Impacts

4.5.4.1 Geology and Soils

As discussed in **Section 3.0** of this Draft EIR, there are seven related projects that were considered in the cumulative analysis for the proposed Project. The related projects generally consist of infill development including apartments, single-family homes, mixed use, retail, office and school uses (KOA, 2019, Attachment F) (refer to **Appendix O** to this EIR). Similar to the proposed Project, the related projects would be required to be designed and constructed in conformance with current building codes and engineering practices including City building and foundation design regulations such as California State Building Code (Title 24) and requirements from State of California's Department of General Services, Division of the State Architect (DSA). As required by the California State Building Code (Title 24), related projects would also require a structural engineer to evaluate any proposed structures for anticipated seismically-induced settlements and deformations to ensure they would support potential gravity loads. Seismic building code requirements such as this would be implemented to reduce potential impacts due to settlement and seismic activity to less than significant.

Construction and implementation of the Project has the potential to temporarily increase erosion of soils through ground disturbance. However, this impact is anticipated to be short-term and minor, due to the implementation of erosion and sediment control BMPs. The Project also has the potential to expose a greater number of people to a seismically hazardous area by allowing a larger population to live on the Project site (compared to existing conditions); however, this potential risk is ubiquitous throughout southern California and construction and implementation of the Project would not add to the cumulative potential impacts on the population, from exposure to seismic hazards. With implementation of mitigation measure **GEO-1**, Project impacts associated with geology and soils would be less than significant. Construction and implementation of the Project is not anticipated to

add to the cumulative potential risks of geologic hazards to the people within the region. Therefore, no cumulative impacts related to geology and soils are anticipated.

4.5.4.2 Paleontological Resources

Ground-disturbing activities such as grading and excavation during construction of the proposed Project may result in adverse impacts to paleontological resources if they were encountered during construction. All related projects would be subject to the same requirements of CEQA and relevant legislation that affords protection to paleontological resources. With implementation of mitigation measure **PALEO-1**, the proposed Project would have a less-than-significant impact to paleontological resources and therefore, a less-than-significant cumulative impact to paleontological resources.

4.5.5 Mitigation Measures

4.5.5.1 Geology and Soils

As discussed above, the Project would comply with applicable state laws, CBC requirements, the City's regulatory requirements and recommendations provided in the Project's geotechnical investigation (provided in **Appendix J** of this Draft EIR). The following mitigation measure would ensure that the Project's potential impacts associated with geology and soils would be reduced to less than significant levels:

GEO-1: Prior to issuance of grading permits, the Applicant shall submit final design plans and a final design-level geotechnical report to the Los Angeles Department of Building and Safety for review and approval. The design-level geotechnical report shall be used for final design of the foundation system for the structures and shall take into consideration the engineering properties beneath the proposed structures and the projected loads. The final report shall specify geotechnical design parameters that are needed by structural engineers to determine the type and sizing of structural building materials. The final report shall be subject to the specific performance criteria imposed by all applicable state and local codes and standards. The final geotechnical report shall be prepared by a registered civil engineer or certified engineering geologist and include appropriate measures to address seismic hazards and ensure structural safety of the proposed structures. The proposed structures shall be designed and constructed in accordance with all applicable provisions of the California Building Code and the Los Angeles Building Code. The design-level geotechnical report shall address each of the recommendations provided in the Geotechnical Investigation Report prepared by Geocon West Inc. (Geocon, 2019; **Appendix J**); dated May 16, 2018 (Revised January 2019), including, but not limited to the following:

- Grading, shoring and foundation plans shall be reviewed by the Geotechnical Engineer prior to finalization to verify that the plans have been prepared in substantial conformance with the recommendations of the Geotechnical Investigation Report (Geocon, 2019) and to provide additional analyses or recommendations.

- Based on the final foundation loading configurations, the potential for settlement shall be reevaluated.

- All excavations shall be observed and approved in writing by the Geotechnical Engineer. Prior to placing any fill, the excavation bottom shall be proof-rolled with heavy equipment in the presence of the Geotechnical Engineer.

- All onsite excavations shall be conducted in such a manner that potential surcharges from existing structures, construction equipment, and vehicle loads are resisted. The surcharge area shall be defined by a 1:1 projection down and away from the bottom of an existing foundation or vehicle load. Penetrations below this 1:1 projection shall require special excavation measures such as sloping or shoring.

- As a minimum, the upper 5 feet of existing earth materials within the proposed building footprint areas shall be excavated and properly compacted for foundation and slab support. Deeper excavations shall be conducted as necessary to remove existing artificial fill or soft alluvial soil at the direction of the Geotechnical Engineer. Proposed building foundations shall be underlain by a minimum of 3 feet of newly placed engineered fill. The excavation shall extend laterally a minimum distance of 3 feet beyond the building footprint areas, including building appurtenances, or a distance equal to the depth of fill below the foundation, whichever is greater.

- Due to the expansive potential of the subgrade soils, the moisture content in the slab and foundation subgrade shall be maintained at 2 percent above optimum moisture content prior to and at the time of concrete placement.

- After finish pad grades have been achieved, laboratory testing of the subgrade soil shall be performed to confirm the corrosivity characteristics of the soils.

- To minimize or avoid the potential for concrete or metal corrosion in onsite soils, a corrosion engineer shall be retained prior to construction to evaluate corrosion test results and incorporate any necessary precautions into project design.

- Concrete mix design shall be reviewed by a qualified corrosion engineer to evaluate the general corrosion potential of the soils on the Project Site.

- Buried metallic structures and elements shall be designed with corrosions protection as determined by a qualified corrosion engineer.

- Project Site soils shall be evaluated for expansion in the final geotechnical report.

- All surface water shall be diverted away from excavations.

- Waterproofing of subterranean walls and slabs shall be required to prevent moisture intrusion and water seepage. Particular care shall be taken in the design and installation of waterproofing to avoid moisture problems, or actual water seepage into the structure through any normal shrinkage cracks which may develop in the concrete walls, floor slab, foundations and/or construction joints.

- A waterproofing consultant shall be retained in order to recommend a product or method, which would provide protection to subterranean walls, floor slabs and foundations.

- Back-drains, if utilized, shall be designed per the recommendations of the final geotechnical report.

- Sub-drainage pipes at the base of the retaining wall drainage system shall outlet to an acceptable location via controlled drainage structures. Drainage shall not be allowed to flow uncontrolled over descending slopes.

- Retaining walls shall include a drainage system extended at least two-thirds the height of the wall. At the base of the drain system, a subdrain covered with a minimum of 12 inches of gravel shall be installed, and a compacted fill blanket or other seal placed at the surface. The clean bottom and subdrain pipe, behind a retaining wall, shall be observed by the Geotechnical Engineer prior to placement of gravel or compacting backfill.

- Wall backfill specifications (e.g., material gradation, compaction requirements, etc.), and surcharge conditions shall be designed per the recommendations of final geotechnical report.

- Walls shall be properly drained to prevent buildup of hydrostatic pressures behind walls or be designed to withstand hydrostatic pressures.

- Seismic lateral forces shall be incorporated into the design as necessary. The structural engineer shall determine the seismic design category for the project in accordance with Section 1613 of the CBC. If the project possesses a seismic design category of D, E, or F, proposed retaining walls in excess of 6 feet in height should be designed with seismic lateral pressure (Section 1803.5.12 of the 2016 CBC).

- The results of the percolation testing shall be evaluated by the project civil engineer to determine if a stormwater infiltration system is required.

- All site drainage shall be collected and controlled in non-erosive drainage devices. Drainage shall not be allowed to flow uncontrolled over any descending slope or pond anywhere on the site, and especially not against any foundation or retaining wall.

- Positive site drainage shall be provided away from structures, pavement, and the tops of slopes to swales or other controlled drainage structures. The building pad and pavement areas shall be fine graded such that water is not allowed to pond. Discharge from downspouts, roof drains, and scuppers shall not occur onto unprotected soils within 5 feet of the building perimeter. Planters located adjacent to foundations shall be sealed to prevent moisture intrusion into the soils providing foundation support.

4.5.5.2 Paleontological Resources

Project construction activities have the potential to penetrate older Pleistocene alluvium (of unknown fossil potential) and the Puente Formation, where fossils are likely to be found (**Figures 4.5-5** and **4.5-6**), and thus significantly impact a paleontological resource. The mitigation measures set forth below are designed to ensure that should any fossil remains be encountered or uncovered by earth-moving activities, specific construction practices would be implemented allowing for the rapid recovery of fossil remains and for the recording of associated specimen and site data, and, if necessary, diverting the earth-moving activities temporarily around any newly discovered fossil site until the remains had been removed by a monitor.

Based on recommendations from the LACM, Department of Vertebrate Paleontology (McLeod, 2019) (See **Appendix Q**), and to avoid inadvertent impacts to subsurface paleontological resources, implementation of the following mitigation measure would reduce potential impacts to paleontological resources to a less-than-significant level.

PALEO-1: A qualified paleontologist (approved by the City or County of Los Angeles, as applicable, and the Los Angeles County Natural History Museum Vertebrate Paleontology Department) shall be retained prior to excavation and grading activities at the Project Site.

- Prior to the earth-moving activities, the paleontologist shall develop a site-specific Paleontological Resources Impact Mitigation Program (PRIMP) to be implemented in support of the Project in order to mitigate potential adverse impacts to paleontological resources. The PRIMP shall follow guidelines developed by the Society for Vertebrate Paleontology and shall include, but not be limited to, monitoring of ground disturbance activities in sediments that are likely to include paleontological resources, specimen recovery, and screen washing; preparation of any collected specimens to the point of identification; curation of any collected specimens to a museum repository with permanent, retrievable storage; and preparation of a final compliance report that would provide details of monitoring, fossil identification, and repository arrangements. The Project Applicant shall then comply with the recommendations of the Project paleontologist and requirements of the PRIMP.

- Before the mitigation program begins, the paleontologist or monitor shall coordinate with the appropriate construction contractor personnel to provide information regarding City or County of Los Angeles requirements, as applicable, for the protection of paleontological resources. Contractor personnel shall be briefed on procedures to be followed in the event that fossil remains and a previously unrecorded fossil site are encountered by earth-moving activities, particularly when the monitor is not on site.

- The qualified paleontologist shall perform periodic inspections of excavation and grading activities at the Project Site to determine the presence of fossiliferous soils. The frequency and location of inspections shall be specified in the PRIMP and shall depend on the depth of excavation and grading activities and the materials being excavated. When Puente Formation sediments (known to contain Miocene marine fossils) are encountered (generally at depths of 11 to 16 feet or

more at the Project site) the paleontologist shall monitor full time during excavation. If paleontological materials are encountered, the paleontologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. A copy of the paleontological survey report shall be submitted to the Los Angeles County Natural History Museum. Any fossils recovered during mitigation shall be deposited in an accredited and permanent scientific institution for the benefit of current and future generations.

4.5.6 Level of Significance after Mitigation

4.5.6.1 Geology and Soils

With adherence to applicable regulatory requirements and mitigation measure **GEO-1**, presented in **Section 4.5.5**, project-level and cumulative impacts related to geology and soils would be less than significant.

4.5.6.2 Paleontological Resources

With the implementation of recommended mitigation measure **PALEO-1**, presented in **Section 4.5.4**, project-level and cumulative impacts to paleontological resources would be reduced to less than significant.

4.6 Greenhouse Gas Emissions

4.6.1 Introduction

Gases that trap heat in the atmosphere are called greenhouse gases (GHGs), since they have effects that are analogous to the way in which a greenhouse retains heat. GHGs are emitted by both natural processes and human activities. The accumulation of GHGs in the atmosphere regulates the earth's temperature. The State of California has undertaken initiatives designed to address the effects of GHG emissions, and to establish targets and emission reduction strategies for GHG emissions in California. Activities associated with the Project, including construction and operational activities, would have the potential to generate GHG emissions.

This section discusses the main GHG species of interest, regulations pertaining to climate change, the Project's consistency with plans for reducing GHG emissions, existing and predicted future GHG emissions from the Project Site, and their significance under CEQA.

4.6.2 Environmental Setting

4.6.2.1 Greenhouse Gases

The principal GHGs are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), sulfur hexafluoride, perfluorocarbons, hydrofluorocarbons, and water vapor. CO_2 is the reference gas for climate change because it is the predominant GHG emitted. To account for the varying warming potential of different GHGs, GHG emissions are often quantified and reported as CO_2 equivalent (CO_2e). CO_2e emissions are calculated as the sum of the products of each species' emissions and its global warming potential (GWP). The GWP is based upon the heat-absorbing ability of a GHG compound relative to that of CO_2, as well as the persistence in the atmosphere relative to that of CO_2. The higher its GWP, the more a given species heats the atmosphere, over a given time. The 100-year GWP values for CO_2, CH_4 and N_2O were assumed in this evaluation to be 1, 25 and 298, respectively (Forster et al., 2017).

4.6.2.2 Regulatory Framework

Federal

The federal government is taking several common-sense steps to address the challenge of climate change. The U.S. Environmental Protection Agency (USEPA) collects several types of GHG emissions data. These data help policy makers, businesses, and USEPA track GHG emissions trends and identify opportunities for reducing emissions and increasing efficiency. USEPA has been collecting a national inventory of GHG emissions since 1990, and in 2009 established mandatory reporting of GHG emissions from large GHG emissions sources.

Current USEPA efforts based on historical website material reflecting the USEPA website as it existed on January 19, 2017 (USEPA, 2018b) include regulatory initiatives such as USEPA's vehicle GHG rules and Clean Power Plan; partnering with the private sector through voluntary energy and climate programs; and reducing USEPA's carbon footprint with the federal GHG requirements and USEPA's Strategic Sustainability Performance Plan. However, the current administration is making efforts to reverse the previous administration's climate change regulations and plans (Eilperin and Dennis, 2017; USEPA, 2017). Because litigation to prevent this reversal is pending, it is assumed that regulations adopted as of January 17, 2018 continue in force.

State

Through several pieces of legislation, gubernatorial executive orders, and administrative regulations that relate to GHG emissions and climate change, California has set aggressive goals for GHG reductions within the state. Per Senate Bill (SB) 97, the California Natural Resources Agency adopted amendments to the CEQA Guidelines, which address the specific obligations of public agencies when analyzing GHG emissions under CEQA to determine a project's effects on the environment. However, neither a threshold of significance nor any specific mitigation measures are included or provided in these CEQA Guideline amendments. The major state provisions for reducing GHG emissions are as follows:

Assembly Bill 32 (AB 32)

The California Global Warming Solutions Act of 2006, widely known as AB 32, requires the California Air Resources Board (ARB) to develop and enforce regulations for the reporting and verification of statewide GHG emissions. The ARB is directed to set a statewide GHG emission limit, based on 1990 levels, to be achieved by 2020. The bill set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner. The heart of the bill is the requirement that statewide GHG emissions be reduced to 1990 levels by 2020.

The AB 32 Scoping Plan (ARB, 2008) contains the main strategies to achieve the 2020 emissions cap. The plan was developed by the ARB with input from the Climate Action Team and proposes a comprehensive set of actions designed to reduce overall carbon emissions in California, improve the environment, reduce oil dependency, diversify energy sources, and enhance public health while creating new jobs and improving the state's economy. The GHG reduction strategies contained in the AB 32 Scoping Plan include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, and market-based mechanisms such as a cap-and-trade system.

In May 2014, the ARB adopted the First Update to the AB 32 Scoping Plan (ARB, 2014). This update identifies the next steps for California's leadership on climate change. The first update to the initial AB 32 Scoping Plan describes progress made to meet the near-term objectives of AB 32 and defines California's climate change priorities and activities for the next several years. It also frames activities and issues facing the state as it develops an integrated framework for achieving both air quality and climate goals in California beyond 2020.

In the original AB 32 Scoping Plan, the ARB approved a total statewide GHG 1990 emissions level and 2020 emissions limit of 427 million metric tons (MT) of CO_2e. As part of the update, the ARB revised the 2020 Statewide limit to 431 million MT of CO_2e, an approximately 1% increase from the original estimate. The 2020 business-as-usual forecast in the update is 509 million MT of CO_2e. The state would need to reduce those emissions by 15.3% to meet the 431 million MT of CO_2e 2020 limit.

In November 2017, the ARB published the 2017 AB 32 Scoping Plan (ARB, 2017), which builds upon the former AB 32 Scoping Plan and Update by outlining priorities and recommendations for the state to achieve its 2030 GHG target of a 40% reduction in GHGs by 2030, compared to 1990 levels. The major elements of the framework proposed are enhancement of the Renewables Portfolio Standard (RPS) and the Low Carbon Fuel Standard (LCFS); a Mobile Source Strategy, Sustainable Freight Action Plan, Short-Lived Climate Pollutant Reduction Strategy, Sustainable Communities Strategies, and a Post-2020 Cap-and-Trade Program; a 20% reduction in GHG emissions from the refinery sector and an Integrated Natural and Working Lands Action Plan.

Executive Order B-30-15

On April 29, 2015, Governor Edmund G. Brown Jr. issued an executive order to establish a California GHG reduction target of 40% below 1990 levels by 2030. This new emission reduction target is a step toward the ultimate goal of reducing emissions by 80% below 1990 levels by 2050. The executive order also specifically addresses the need for climate adaptation and directs state government to:

- Incorporate climate change impacts into the state's Five-Year Infrastructure Plan.
- Update the Safeguarding California Plan – the state climate adaption strategy – to identify how climate change will affect California infrastructure and industry, and what actions the state can take to reduce the risks posed by climate change.
- Factor climate change into state agencies' planning and investment decisions.
- Implement measures under existing agency and departmental authority to reduce GHG emissions.

California Senate Bills 1078, 107, 2, and 350; Renewables Portfolio Standard

Established in 2002 under California SB 1078 and accelerated in 2006 under California SB 107, California's RPS requires retail suppliers of electric services to increase procurement from eligible renewable energy resources by at least 1% of their retail sales annually, until they reach 20% by 2010.

On April 2, 2011, Governor Brown signed California SB 2 to increase California's RPS to 33% by 2020. This new standard also requires regulated sellers of electricity to procure 25% of their energy supply from certified renewable resources by 2016. In October 2015, Governor Brown signed into legislation SB 350, which requires retail sellers and publicly owned utilities to procure 50% of their electricity from eligible renewable energy resources by 2030. Under SB 100, signed by Governor Brown on September 10, 2018, the renewables requirement was increased to 60%.

Low Carbon Fuel Standard (LCFS)

California Executive Order S-01-07 (January 18, 2007) requires a 10% or greater reduction in the average carbon intensity for transportation fuels in California regulated by the ARB. The ARB identified the LCFS as a Discrete Early Action item under AB 32, and the final resolution (09-31) was issued on April 23, 2009.

Sustainable Communities and Climate Protection Act (SB 375)

California's Sustainable Communities and Climate Protection Act, also referred to as SB 375, became effective January 1, 2009. The goal of SB 375 is to help achieve AB 32's GHG emissions reduction goals by aligning the planning processes for regional transportation, housing, and land use. SB 375 requires the ARB to develop regional reduction targets for GHGs and prompts the creation of regional plans to reduce emissions from vehicle use throughout the state. California's 18 Metropolitan Planning Organizations (MPOs) have been tasked with creating Sustainable Community Strategies in an effort to reduce the region's vehicle miles traveled (VMT) in order to help meet AB 32 targets through integrated transportation, land use, housing and environmental planning. Pursuant to SB 375, the ARB set per-capita GHG emissions reduction targets from passenger vehicles for each of the state's

18 MPOs. In March 2018, the ARB issued a regional 8% per capita reduction target for the planning year 2020, and a target of 19% for 2035 in the jurisdiction of the Southern California Association of Governments (ARB, 2019d).

California Green Building Standards (CALGreen) Code

Although not originally intended to reduce GHGs, California Code of Regulations Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24), was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. Since then, Title 24 has been amended with recognition that energy-efficient buildings that require less electricity reduce fuel consumption, which in turn decreases GHG emissions. The current 2016 Title 24 standards (effective as of January 1, 2017) were revised and adopted in part to respond to the GHG reduction targets. Specifically, new development projects constructed within California after January 1, 2014 are subject to the mandatory planning and design, energy efficiency, water efficiency and conservation, material conservation and resources efficiency, and environmental quality measures of the California Green Building Standards (CALGreen) Code (California Code of Regulations, Title 24, Part 11). As noted on page 37 in the First Update to the AB 32 Scoping Plan (May, 2014), building efficiency standards that were updated in 2013 were identified to be 25% more efficient for residential construction and 30% more efficient for non-residential construction.[42]

Regional

South Coast Air Quality Management District

The South Coast Air Quality Management District (SCAQMD) is responsible for regional planning to achieve attainment of ambient air quality standards in the South Coast Air Basin, in which the Project is located.[43] It also enforces federal and state emission regulations through a system of source-specific rules and by requiring permits for building and operating facilities that emit criteria pollutants and toxic air contaminants. The SCAQMD does not have rules limiting GHG emissions, nor does it issue permits specifically for emissions of GHG species. However, some of its rules and permit conditions, by limiting fossil fuel combustion, have a side benefit of reducing GHG emissions.

In 2008, the SCAQMD proposed GHG emission thresholds to be used for evaluating significance under CEQA (SCAQMD, 2008). Under the proposal, commercial and/or residential projects that emit less than 3,000 metric tons (MT) of CO_2e would be assumed to have a less than significant impact on climate change. However, this threshold has never been formally adopted.

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is the federally-designated metropolitan planning agency for Ventura, Los Angeles, Riverside, San Bernardino and Imperial Counties. It works together with the SCAQMD to prepare the triennial Air Quality Management Plan (AQMP). It is also responsible for quadrennial updates of the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), the latest of which guides transportation developments between 2016 and 2040 (SCAG, 2016). The 2016-2040 RTP/SCS prescribes the following measures (SCAG, 2016, Executive Summary):

42 Computed from California Energy Demand, 2012–2022 Final Forecast, June 2012, Form 2.2 on Committed Energy Impacts.

43 For more detailed information on the SCAQMD, refer to **Section 4.2**.

- Preserving the transportation system we already have (fix-it-first).
- Expanding our regional transit system to give people more alternatives to driving alone.
- Expanding passenger rail.
- Improving highway and arterial capacity.
- Managing demands on the transportation system.
- Optimizing the performance of the transportation system.
- Promoting walking, biking and other forms of active transportation.
- Strengthening the regional transportation network for goods movement.
- Leveraging technology.
- Improving airport access.
- Focusing new growth around transit.
- Improving air quality and reducing greenhouse gases.
- Preserving natural lands.

SCAG estimates that, compared with an alternative of not adopting the Plan, the 2016 RTP/SCS would result in an eight percent reduction in greenhouse gas emissions per capita by 2020, an 18 percent reduction by 2035 and a 21% reduction by 2040 – compared with 2005 levels. This meets or exceeds the state's mandated reductions, which are 8% by 2020 and 19% by 2035.

Local

The City of Los Angeles has taken several actions to address climate change. They are summarized as follows

City of Los Angeles Green LA Action Plan/Climate LA

The City of Los Angeles (City) is addressing the issue of global climate change through implementation of Green LA, An Action Plan to Lead the Nation in Fighting Global Warming (LA Green Plan) (City of Los Angeles, 2007), which outlines the goals and actions that the City has established to reduce the generation and emission of GHGs from public and private activities. According to the LA Green Plan, the City is committed to the goal of reducing emissions of CO_2 to 35% below 1990 levels by the year 2030. To achieve this goal, the City is increasing the generation of renewable energy, improving energy conservation and efficiency, and changing transportation and land use patterns to reduce dependence on automobiles.

City of Los Angeles Green Building Code

In 2016, the City amended Chapter IX of the Los Angeles Municipal Code (LAMC) to incorporate by reference the 2016 Edition of the California Building Code, also known as CALGreen, with Ordinance No. 184,692. As stated in the LAMC, these regulations shall be known as the Los Angeles Green Building Code and may be cited as a result. The provisions of this code shall apply to the construction of every new building, every building alteration with a building permit valuation of $200,000 or more, and every building addition, unless otherwise indicated in this code, throughout the City. The

Los Angeles Green Building Code contains both mandatory and voluntary green building measures for the reduction of GHG emissions through energy conservation. It requires projects to achieve a 20% reduction in potable water use and wastewater generation, and to meet and exceed Title 24 Standards. In addition, the proposed Project is required to implement applicable energy conservation measures to reduce GHG emissions such as those described in AB 32.

Sustainable City pLAn

On April 8, 2015, Los Angeles released the Sustainable City pLAn (pLAn) (City of Los Angeles, 2018a), a sustainability plan for the City of Los Angeles. The plan covers a multitude of environmental, social, and economic sustainability issues. Many of the sustainability plan goals and actions relate to GHG reduction either specifically or by association. Actionable goals include increasing the green building standard for new construction, creating benchmarking policy for building energy use; developing "blue, green, and black" waste bin infrastructure; reducing water use by 20%; and possibly requiring LEED Silver or better for new construction. The pLAn's 3rd Annual Report (City of Los Angeles, 2018b) reported that the Port of L.A. announced goals to transition all terminal equipment to zero emissions by 2030 and to transition to a zero-emission drayage fleet by 2035 and that at nearly 1,500, L.A. has the most publicly available electric vehicle (EV) chargers of any U.S. city. Also reported was that the Los Angeles Department of Water and Power has committed to install 10,000 EV chargers in the next five years and has launched Solar Rooftops, a community solar program to help deploy solar in low-solar penetration neighborhoods.

In 2019, the City of Los Angeles released a fully updated version of the Sustainable City pLAn, referred to as Mayor Garcetti's "Green New Deal" (City of Los Angeles, 2019, pp. 8-11). This new document sets new emission, energy use, and water targets for the City of Los Angeles to follow until the next full review. One of the Green New Deal's main focuses is to convert Los Angeles' economy into an inclusive green economy by creating more green technology jobs, expanding recycling and renewal infrastructure, and creating more renewable energy plants. The Sustainable City pLAn is also a guideline for the City of Los Angeles to commit to the standards of the Paris Climate Agreement. New guidelines committing the City to a Carbon Budget consistent with the Paris Climate agreement are adopted in this plan. In order to achieve this, the pLAn looks at new ways to reduce and control emissions through setting new building and vehicle standards that will be implemented within the coming years.

City of Los Angeles General Plan Framework

The City of Los Angeles General Plan (GP) includes a Framework Element (City of Los Angeles, 1995), which establishes the broad overall policy and direction for the entire GP and provides a citywide context and a comprehensive long-range strategy to guide the comprehensive update of the GP's other elements. The GP is a dynamic document consisting of several elements, as well as the Land Use Element, which consists of the plans for each of the City's 35 Community Plan Areas.

Health and Wellness Element

The Plan for a Healthy Los Angeles (PHLA) was adopted in 2015 (City of Los Angeles, 2015) as a Health and Wellness Element for the GP, that lays the foundation to create healthier communities for all Angelenos through a focus on public health from the perspective of the built environment and City services. As an element of the GP, the PHLA builds on and complements current policies in the GP. Goals and objectives presented in the Health and Wellness Element related to climate change and GHG emissions are listed below:

Chapter 2: A City Built for Health.

- Policy 2.2: Healthy building design and construction – the healthy built environment includes promoting enhanced pedestrian-oriented circulation.

Chapter 4: Food that Nourishes the Body, Soul, and Environment.

- Policy 4.6: Food cycle sustainability – encourages agricultural operations that use resources more efficiently such as using graywater and rainwater capture, composting and generating less food waste, crop diversity, and habitat diversity.

- Policy 4.7: Empower Angelenos to grow and eat healthy food – fostering and promoting local initiatives and partnerships that empower, educate, and train Angelenos to grow and eat healthy food. Locally grown sources reduce the need for long-range transport of non-locally grown produce.

Chapter 5: An Environment Where Life Thrives.

- Policy 5.6: Resilience – in collaboration with public, private, and nonprofit partners, increase the City's resilience to risks (increasing temperatures and heat related effects, wildfires, reduced water supply, poor air quality, and sea level rise) resulting from climate change.

- Policy 5.7: Land use planning for public health and GHG emission reduction – promotes land use policies that reduce per capita GHG emissions, result in improved air quality and decreased air pollution, especially for children, seniors and others susceptible to respiratory diseases.

Air Quality Element

The GP's Air Quality Element was adopted in 1992 (City of Los Angeles, 1992) as one of the GP's Primary Citywide Elements, that interact to affect the type, location, and intensity of land uses and the timing and phasing of development in the City. Even though the Air Quality Element was last published before climate change and GHG emissions were a recognized concern, the natural overlap would result in some applicable goals and objectives presented in the Air Quality Element that are listed below:

Goal 2: Less reliance on single-occupant vehicles with fewer commute and non-work trips.

- Objective 2.1: to reduce work trips as a step towards attaining trip reduction objectives necessary to achieve regional air quality goals.

- Objective 2.2: to increase vehicle occupancy for non-work trips by creating disincentives for single passenger vehicles, and incentives for high occupancy vehicles.

Goal 4: Minimal impact of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.

- Objective 4.2: to reduce vehicle trips and vehicle miles travelled associated with land use patterns.

Goal 5: Energy efficiency through land use and transportation planning, the use of renewable resources and less polluting fuels, and the implementation of conservation measures including passive methods such as site orientation and tree planting.

- Objective 5.1: to increase energy efficiency of City facilities and private developments.
- Objective 5.2: to have a portion of the City's service fleet be comprised of alternative fuel powered vehicles, subject to availability of funding, and practical feasibility.
- Objective 5.3: to reduce the use of polluting fuels in stationary sources.

Mobility Plan 2035

The Mobility Plan 2035 (MP2035) was adopted September 7, 2016 (City of Los Angeles, 2016) and is now an element of the GP. The MP2035 provides the policy foundation for achieving a transportation system that balances the needs of all road users. As an update to the City's General Plan Transportation Element (last adopted in 1999), MP2035 incorporates "complete streets" principles and lays the policy foundation for how future generations of Angelenos interact with their streets. The MP2035 Clean Environments & Healthy Communities Goal contains objectives important to air quality such as decreasing VMT per capita by 5% every five years, to 20% by 2035 and reducing the number of unhealthy air quality days to zero by 2025. The following policies aid in reaching those goals and objectives:

- Policy 5.1 Sustainable Transportation: allowing people to make more environmentally sustainable and physically beneficial transportation choices by making other options such as walking, biking, and transit seen as a safe, attractive, and convenient mode choice.
- Policy 5.2 Vehicle Miles Traveled (VMT): support ways to reduce VMT per capita such as:
    - Land use policies aimed at shortening the distance between housing, jobs, and services that reduce the need to travel long distances daily.
    - Increasing the availability of affordable housing options with proximity to transit stations and major bus stops.
    - Offering more attractive non-motor vehicle alternatives, including transit, walking, and bicycling.
    - Transportation Demand Management programs that encourage ride-sharing.
    - Pricing mechanisms that encourage commuters to consider alternatives to driving alone, including congestion or cordon pricing, which would charge vehicles entering a congested area (such as downtown during rush hour).
- Policy 5.4 Clean Fuels and Vehicles: continuing to encourage the adoption of low and zero emission fuel sources, new mobility technologies, and supporting infrastructure. Since motor vehicles will continue to be a common mode of transportation for the foreseeable future, improving their efficiency is an important complementary policy to Policy 5.2.

Northeast Los Angeles Community Plan

While the GP sets out a long-range vision and guide to future development, the 35 Community Plans provide the specific, neighborhood-level detail, relevant policies, and implementation strategies necessary to achieve the GP objectives. The Project is in the Northeast Los Angeles Community Plan (Community Plan) area, which was last revised in 1999 and amended in 2016 with a Mobility Plan 2035 Update. The Community Plan area encompasses the hills and valleys lying east of the Los Angeles River and north of the Boyle Heights Community Plan area within the City of Los Angeles. The Community Plan contains goals, objectives and policies that may affect the Project:

Public Transportation Goal 11: Develop a public transportation system that improves mobility with convenient alternatives to automobile travel.

- Objective 11-1: To encourage improved local and express bus service throughout the community and bus routes that connect with freeways and rail facilities.
    - Policy 11-1.2: Encourage the expansion, wherever feasible, of programs aimed at enhancing the mobility of senior citizens, disabled persons, and the transit-dependent population.

4.6.2.3 Existing Greenhouse Gas Emissions

The Project Site is currently developed with 228,254 square feet of residential use. GHG emissions are currently generated by the use of onroad motor vehicles, energy (electricity and natural gas), water, and generation of solid waste and wastewater. The GHG emissions generated by the existing uses at the Project Site have been estimated utilizing the California Emissions Estimator Model (CalEEMod), Version 2016.3.2 (CAPCOA, 2017) recommended by the South Coast Air Quality Management District (SCAQMD), and are shown in **Table 4.6-1**. (See **Section 4.6.4** and **Section 4.6.5** for further discussion of methodology.) GHG emissions generated under existing conditions at the Project Site are approximately 987 MT CO_2e per year.

Table 4.6-1
EXISTING GHG EMISSIONS

Emissions Source	Estimated Project CO_2e Emissions (Metric Tons per Year)
Area Sources	1.7
Energy (Electricity & Natural Gas)	257.6
Mobile (Motor Vehicles)	622.9
Solid Waste Generation	23.1
Water Demand	81.7
Existing Project Site Total	**987**

*Calculation data and results provided in **Appendix A**.*

4.6.3 Project Impacts

4.6.3.1 Thresholds of Significance

State CEQA Guidelines Appendix G

In accordance with **Appendix G** of the State CEQA Guidelines, the Project would have a significant impact related to GHGs if it would:

Threshold (a): ***Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or***

Threshold (b): ***Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.***

According to the CEQA Guidelines, a lead agency shall have the discretion to determine, for a specific project, whether to quantify GHG emissions and/or to rely on a qualitative analysis or performance-based standards.[44] A lead agency should consider the following factors, among others, when determining the significance of GHG emissions on the environment:[45]

- The extent to which the project would increase or decrease GHG emission with reference to existing environmental conditions.
- Whether the project's GHG emissions would exceed a numeric threshold of significance that the lead agency determines to apply to the project.
- The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional or local plan for reducing or mitigating GHG emissions.

Neither the State of California, the City of Los Angeles, nor the SCAQMD has a formally adopted numeric, "bright line" threshold that distinguishes between significant and less than significant GHG emission levels for development projects such as Rose Hill Courts. As discussed in **Section 4.6.2**, the SCAQMD has proposed a threshold of 3,000 metric tons per year, but has not adopted it as a rule or guideline. Similarly, the 2006 City of Los Angeles CEQA Thresholds Guide (City of Los Angeles Environmental Affairs Department, 2006) does not identify any criteria to evaluate impacts related to GHG emissions impacts, because that guide was completed prior to enactment of SB 97, which required consideration of GHG emissions and impacts as part of the CEQA process.

In light of the foregoing, the Project's significance was evaluated by considering the extent to which it complies with regulations or requirements adopted to implement a statewide, regional or local plan for reducing or mitigating GHG emissions. The Project was compared with the AB 32 Scoping Plan, the 2016-2040 RTP/SCS, and various other state, regional and local plans and regulations to determine its consistency therewith. As part of this comparison it was useful to estimate the <u>change</u> in per capita GHG emissions, as a measure of whether the Project would be consistent with the aforementioned plans. Therefore, the Project's construction and operational emissions were estimated and compared with estimates of GHG emissions under current conditions.

44 CEQA Guidelines § 15064.4(a).
45 Ibid., § 15064.4(b).

4.6.3.2 Emission Calculation Methodology

CalEEMod, Version 2016.3.2, the same software that was used for the criteria air pollutant analysis, was used to estimate carbon dioxide, methane, and nitrous oxide emissions for project construction and operation. Modeling inputs and results are provided in **Appendix G**. The model calculates the CO_2e emissions from the emissions and global warming potentials of the three aforementioned species. For the base case (existing conditions) the "historical data" option was selected. This option assumes that the 2005 Title 24 standards, rather than the current ones, apply.[46] Total construction emissions were "amortized" over 30 years and added to the operational emissions. Baseline emissions were subtracted from future annual operating emissions to determine the increase in GHG emissions. Further information about the analytical approach is presented in **Section 4.6.3.3**.

Project Design Features

The Project would comply with the Los Angeles Green Building Code, which is based on the 2016 California Green Building Standards Code (CalGreen) (Part 11 of Title 24, California Code of Regulations). The following are proposed energy conservation measures that are beyond the minimum requirements of the Los Angeles Green Building Code:

Energy Conservation and Efficiency

GHG-PDF-1: Project design will provide an energy efficiency exceeding Title 24, Part 6, California Energy Code baseline standard requirements, based on the 2016 Building Energy Efficiency Standards requirements.[47]

GHG-PDF-2: Use of high-efficiency Energy Star appliances, where appropriate.

Water Conservation

GHG-PDF-3: Inclusion of water conservation measures in accordance with the Los Angeles Department of Water and Power requirements for new development in the City of Los Angeles (e.g., high-efficiency fixtures and appliances, weather-based irrigation systems, drought-tolerant landscaping).

GHG-PDF-4: Use of drought-tolerant plants and indigenous species, stormwater collection, permeable pavement wherever possible, and stormwater filtration, storage and re-use for landscaping.

GHG-PDF-5: Use of high-efficiency toilets, including dual-flush water closets, as appropriate.

GHG-PDF-6: Use of high-efficiency showerheads at 1.5 gallons per minute. Install no showers with multiple showerheads.

GHG-PDF-7: Use of weather-based irrigation controller with rain shutoff, matched precipitation (flow) rates for sprinkler heads, and rotating sprinkler nozzles or comparable technology such as drip/micro spray/subsurface irrigation where appropriate.

46 This would tend to underestimate the baseline, inasmuch as the buildings date to 1942. The new Project's excess over baseline would therefore be overestimated.

47 For analysis purposes, a value of 10% more efficient than Title 24 was used in the CalEEMod model.

GHG-PDF-8: Installation of a separate water meter (or submeter), flow sensor, and master valve shutoff for irrigated landscape areas totaling 5,000 square feet and greater.

GHG-PDF-9: Use of proper hydro-zoning and turf minimization, as feasible.

Water Quality

GHG-PDF-10: Installation of pre-treatment stormwater infrastructure for the stormwater treatment system.

GHG-PDF-11: Reduce stormwater runoff through the introduction of new landscaped areas throughout the Project Site and/or on the structure.

Air Quality

GHG-PDF-12: Prohibit the use of any fireplaces in the proposed residential units.

4.6.3.3 Analysis of Project Impacts

Threshold (a): ***Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?***

The estimates for this analysis include the following sources of annual direct and indirect GHG emissions: (1) area sources (e.g., landscaping-related fuel combustion sources); (2) energy use associated with residential buildings; (3) water and wastewater; (4) solid waste; (5) mobile sources (e.g., passenger vehicles and trucks); and (6) construction activity. The ongoing operational emissions consist of the first five categories, while emissions associated with construction are generated only during construction. The typical types of GHG gases emitted from developments such as the Project are CO_2, CH_4, and N_2O.

Construction emissions are from offroad equipment and onroad vehicles such as worker and vendor commuting and trucks for soil and material hauling. CalEEMod defaults were used for construction activity and equipment usage, except that phase lengths were proportionately adjusted to reflect estimated durations supplied by the Project proponent. To assess the temporary construction effect on the Project's overall lifetime GHG emissions, the SCAQMD developed an Interim Guidance (SCAQMD, 2008) recommending that construction emissions should be amortized over the life of the Project, defined in the Guidance as 30 years, which is then added to the operational emissions and compared to the applicable GHG significance threshold.

GHG emissions would also continue to occur every year after buildout. GHGs are emitted from buildings because of activities for which electricity and natural gas are typically used as energy sources. Combustion of any type of fossil fuel emits CO_2 and other GHGs directly into the atmosphere; these emissions are considered direct emissions when associated with a building. GHGs are also emitted during the generation of electricity from fossil fuels; these emissions are indirect emissions as they occur elsewhere but are attributed to the power usage onsite. Indirect GHG emissions also result from the production of electricity used to convey, treat, and distribute water and wastewater. In addition, CalEEMod calculates the indirect GHG emissions associated with waste that is disposed of at a landfill using waste disposal rates by land use and overall composition. CalEEMod defaults were used throughout.

Table 4.6-2 shows the predicted GHG emissions during each construction year. Total GHG emissions are estimated to be 1,099 MT CO_2e, which would amortize to 36.6 MT CO_2e per year.

Table 4.6-2
PROJECT CONSTRUCTION GHG EMISSIONS

Construction Year	Annual CO_2e Emissions (metric tons)		
	Phase I	Phase II	Total
2021	340.0		340
2022	204.6	43.5	248
2023		385.1	385
2024		126.3	126
Totals	544.6	554.9	
Total Construction Emissions			1,099
30-Year Amortized Emissions			36.6

Additionally, since this Project will be replacing an existing project of the same category, the GHG impacts associated with this Project comprise the net change from the current situation. A summary of GHG emissions from the existing housing and proposed Project is presented in **Table 4.6-3**.

It is widely recognized that no single project could generate enough GHG emissions to noticeably change the global climate. However, the combination of GHG emissions from past, present, and future projects could contribute substantially to global climate change. Thus, Project-specific GHG emissions should be evaluated in terms of whether they would result in a cumulatively significant impact on global climate change.

Table 4.6-3
PROJECT NET GHG EMISSIONS

Emissions Source	Estimated Project CO_2e Emissions (Metric Tons per Year)			Estimated Project CO_2e Emissions (Per Capita)		
	Existing	Gross	Net	Existing	Gross	Net
Amortized Construction	N/A	36.6	36.6	N/A	0.056	0.056
Area Sources	1.7	3.2	1.5	0.008	0.005	(0.003)
Energy (Electricity & Natural Gas)	257.6	531.1	273.5	1.17	0.810	(0.36)
Mobile (Motor Vehicles)	622.9	991.4	368.5	2.82	1.51	(1.31)
Solid Waste Generation	23.1	42.8	19.7	0.105	0.065	(0.04)
Water Demand	81.7	136.8	55.1	0.37	0.209	(0.16)
Project Site Totals	**987**	**1,742**	**755**	**4.47**	**2.66**	**(1.81)**

*Calculation data and results provided in **Appendix G***

As discussed in **Section 4.6.3.1**, total GHG emissions were not compared with a numeric threshold. It is clear, however that the Project's net emissions of 755 metric tons per year are minor. For

example, they represent about 0.00018% of the statewide total in 2016.[48] **Table 4.6-3 demonstrates that the Project will have a less than significant cumulative effect. In addition, GHG emissions will decrease from 4.47 to 2.66 MT CO_2e per resident per year, or by about 40%. Therefore, project impacts related to GHG emissions would be less than significant.**

Threshold (b): ***Would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?***

Consistency with Applicable Plans and Policies

AB 32 Scoping Plan

The AB 32 Scoping Plan, which was discussed in **Section 4.6.2.2**, has a variety of measures, developed and implemented largely at the state level, to reduce statewide GHG emissions to 1990 levels by 2020. Subsequent legislation and updates to the AB-32 Scoping Plan have required even greater reductions. Emission reduction actions include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms (such as cap-and-trade), and an AB 32 implementation fee to fund the program. **Table 4.6-4** summarizes AB 32 Scoping Plan elements that are potentially relevant to the Project, along with an analysis of the Project's consistency with them. **Table 4.6-5** does the same for policies and measures that were part of the 2017 update to the AB 32 Scoping Plan. Note that not all of the provisions of the 2017 update have been implemented yet.

48 Statewide total from California Greenhouse Gas Inventory for 2000-2016 — by Gas, California Air Resources Board. https://www.arb.ca.gov/cc/inventory/data/tables/ghg_inventory_bygas.pdf. Accessed May 30, 2019.

Table 4.6-4
CONSISTENCY ANALYSIS – 2008 AB 32 SCOPING PLAN AND FIRST UPDATE

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
Energy (31 % of project inventory)		
California Renewables Portfolio Standard (RPS) program: Senate Bill 2X modified California's RPS program to require that both public and investor-owned utilities in California receive at least 33 percent of their electricity from renewable sources by the year 2020. California Senate Bill 2X also requires regulated sellers of electricity to meet an interim milestone of procuring 25% of their energy supply from certified renewable resources by 2016.	Los Angeles Department of Water and Power (LADWP)	**Consistent.** LADWP's commitment to achieve 35 percent renewables by 2020 would exceed the requirement under the RPS program of 33 percent renewables by 2020. In 2018, LADWP indicated that 30 percent of its electricity came from renewable resources in 2017.[a] As LADWP would provide electricity service to the Project Site, the Project would use electricity that is produced consistent with this performance-based standard. Given LADWP's progress toward meeting and exceeding the established targets as well as penalties for non-compliance, it is assumed LADWP will comply. As a note, the analysis conservatively does not include the updated carbon intensity for electricity generation as required by SB 100.
Senate Bill 350 (SB 350): The Clean Energy and Pollution Reduction Act of 2015 increases the standards of the California RPS program by requiring that the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources be increased to 50 percent by 2030 and also requires the State Energy Resources Conservation and Development Commission to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.[b]	State Energy Resources Conservation and Development Commission and LADWP	**Consistent.** LADWP would be required to meet this performance-based standard. As LADWP would provide electricity service to the Project Site, the Project, by 2030, would use electricity consistent with this performance- based standard. Project buildout would occur in Year 2024 and, therefore, the estimated GHG emissions from electricity usage provided below conservatively do not include implementation of SB 350 with a compliance date of 2030. Electricity GHG emissions presented in **Table 4.6-3** would be further reduced by 17 percent by Year 2030 if the electricity provided to the Project Site by LADWP meets the requirements under SB 350. As a note, the Project conservatively does not include consistency with SB 100.

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
Energy (31 % of project inventory)		
Senate Bill 1368 (SB 1368): GHG Emissions State and Standard for Baseload Generation prohibits any LADWP retail seller of electricity in California from entering into a long-term financial commitment for baseload generation if the GHG emissions are higher than those from a combined-cycle natural gas power plant.	State and LADWP	**Consistent.** LADWP would be required to meet this performance-based standard. As LADWP would provide electricity service to the Project Site, the Project would use electricity consistent with this performance-based standard.
California Code of Regulations (CCR), California **Title 20:** The 2012 Appliance Efficiency Energy Regulations, adopted by the Commission (CEC), include standards for new appliances (e.g., refrigerators) and lighting, if they are sold or offered for sale in California.	State, California Energy Commission	**Consistent.** This performance standard applies to new appliances and lighting that are sold or offered for sale in California. The Project would result in new land use development that would be outfitted with appliances and lighting that comply with CEC's standards.
CCR, Title 24, Building Standards Code: The California 2016 Building Energy Efficiency Standards Energy contained in Title 24, Part 6 (also known as the Commission California Energy Code), requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods. The California Green Building Standards Code (Part 11, Title 24) established mandatory and voluntary standards on planning and design for sustainable site development, energy efficiency (extensive update of the California Energy Code), water conservation, material conservation, and internal air contaminants.	State, California Energy Commission	**Consistent.** Consistent with regulatory requirements, the Project would comply with applicable provisions of the 2017 Los Angeles Green Building Code that in turn requires compliance with mandatory standards included in the California Green Building Standards. The 2016 Title 24 standards are 28 percent more efficient (for electricity) than residential construction built to the 2013 Title 24 standards and 5 percent more efficient (for electricity) for non-residential construction.[c] The 2016 Title 24 standards are more efficient than the 2020 Projected Emissions under Business-as-Usual in the AB 32 Scoping Plan. The standards offer builders better windows, insulation, lighting, ventilation systems and other features that reduce energy consumption in homes and businesses. Thus, the Project has incorporated energy efficiency standards that are consistent with the measures identified in the *AB 32 Scoping Plan* to reduce GHG emissions.

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
Energy (31 % of project inventory)		
Assembly Bill 1109 (AB 1109): The Lighting Efficiency and Toxic Reduction Act prohibits a person from manufacturing for sale in the state general purpose lights that contain certain levels of hazardous materials, and requires the establishment of minimum energy efficiency standards for all general-purpose lights. The standards are structured to reduce average statewide electrical energy consumption by not less than 50 percent from the 2007 levels for indoor residential lighting and not less than 25 percent from the 2007 levels for indoor commercial and outdoor lighting by 2018.[d]	State/ Manufacturers	**Consistent.** The Project would meet the requirements under AB 1109 because it incorporates energy efficient lighting and electricity consumption and thus the Project complies with local and state green building programs.
Cap-and-Trade Program: The program establishes an overall limit on GHG emissions from capped sectors (e.g., electricity generation, petroleum refining, and cement production). Facilities subject to the cap are able to trade permits to emit GHGs within the overall limit.	State	**Consistent.** As required by AB 32 and the 2008 *AB 32 Scoping Plan,* the Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program. Therefore, GHG emissions associated with the Project's electricity usage per year presented in **Table 4.6-3** would be covered by the Cap-and-Trade Program (as LADWP would be a covered entity) and would be consistent with AB 32 and the *AB 32 Climate Change Scoping Plan.*
Million Solar Roofs Program: The program is State implemented through SB 1 (Murray, 2006), which provides up to $3.3 billion in financial incentives for the installation of residential, commercial and institutional solar PV programs.	State	**Inconsistent.** The Project is not currently anticipated to include solar roofing materials or photovoltaic cells; thus, the Project would not be eligible for the financial incentives offered by this program. However, the Project would not hinder implementation of this program.

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
Mobile (56 percent of project inventory)		
Assembly Bill 1493 (AB 1493) "Pavley Standards:" AB 1493 requires the development and adoption of regulations to achieve "the maximum feasible reduction of greenhouse gases" emitted by noncommercial passenger vehicles, light-duty trucks, and other vehicles used primarily for personal transportation in the State. In compliance with AB 1493, the ARB adopted regulations to reduce GHG emissions from non-commercial passenger vehicles and light duty trucks of model year 2009 through 2016. Model years 2017 through 2025 are addressed by California's Advanced Clean Cars program (discussed below).	State, the ARB	**Consistent.** The Pavley regulations reduced GHG emissions from California passenger vehicles by about 22 percent in 2012 and are expected to reduce GHG emissions by about 30 percent in 2016, all while improving fuel efficiency. This regulatory program applies to vehicle manufacturers, and not directly to land use development. Vehicular travel by the Project would benefit from this regulation in the form of reduced GHG emissions because vehicles associated with the Project would be affected by AB 1493. Mobile source emissions generated by the Project would be reduced with implementation of AB 1493 consistent with reduction of GHG emissions under AB 32. Mobile source GHG emissions provided in **Table 4.6-3** were calculated using CalEEMod, which includes implementation of AB 1493 into mobile source emission factors.
Executive Order S-01-07: The Low Carbon Fuel Standard (LCFS) requires a 10-percent or greater reduction by 2020 in the average fuel carbon intensity for transportation fuels in California regulated by the ARB. the ARB identified the LCFS as a Discrete Early Action item under AB 32, and the final resolution (09-31) was issued on April 23, 2009 (the ARB 2009).[e,f]	State, the ARB	**Consistent.** GHG emissions related to vehicular travel by the Project would benefit from this regulation because fuel used by Project-related vehicles would be compliant with LCFS. Mobile source GHG emissions provided in **Table 4.6-3** were calculated using CalEEMod, which includes implementation of the LCFS into mobile source emission factors.
Advanced Clean Cars Program: In 2012, the ARB approved the Advanced Clean Cars Program, a new emissions-control program for model year 2017 through 2025. The program combines the control of smog, soot, and GHGs with requirements for greater numbers of zero-emission vehicles. By 2025, when the rules will be fully implemented, the new automobiles will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions.	State, the ARB	**Consistent.** Similar to AB 1493, this regulatory program applies to manufacturers, and not directly to land use development. Standards under the Advanced Clean Cars Program will apply to all passenger and light duty trucks used by residents, employees, and deliveries to the Project. GHG emissions related to vehicular travel by the Project would be reduced as a result this regulation and mobile source emissions generated by the Project would be reduced with the implementation of standards under the Advanced Clean Cars Program consistent with reduction of GHG emissions under AB 32. Mobile source GHG emissions provided in **Table 4.6-3** conservatively do not include this additional

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
		34-percent reduction in mobile source emissions as the CalEEMod model does not yet account for this regulation.
Mobile (56 percent of project inventory)		
Senate Bill (SB) 375: SB 375 requires integration of planning processes for transportation, land-use and housing. Under SB 375, each Metropolitan Planning Organization would be required to adopt a Sustainable Community Strategy (SCS) to encourage compact development that reduces passenger vehicle miles traveled and trips so that the region will meet a target, created by the ARB, for reducing GHG emissions.	State, the ARB Regional, SCAG	**Consistent.** SB 375 requires SCAG to direct the development of the SCS for the region, which is discussed further below. The Project represents an infill development within an existing urbanized area that would concentrate residential uses within a high-quality transit area (HQTA). Therefore, the Project would be consistent with SCAG's 2016-2040 RTP/SCS as it is located within a HQTA. Furthermore, the 2016-2040 RTP/SCS would result in an estimated 18-percent decrease in per capita GHG emissions by 2035 and a 21-percent decrease in per capita GHG emissions by 2040, within the SCAG region. As discussed above, the ARB updated the SB 375 targets for the SCAG region, requiring a 19-percent decrease in VMT by 2035. Implementation of the 2016-2040 RTP/SCS or the next plan is expected to fulfill and exceed the region's obligations under SB 375 with respect to meeting the State's GHG emission reduction goals. Therefore, the Project would be consistent with SB 375, the reduction in transportation emission per capita provided in the 2016-2040 RTP/SCS, and with the ARB's updated 2035 target.
Solid Waste (2 percent of project inventory)		
California Integrated Waste Management Act of 1989 and Assembly Bill 341: The California Integrated Waste Management Act of 1989 requires each jurisdiction's source reduction and recycling element to include an implementation schedule that shows (1) diversion of 25 percent of all solid waste by January 1, 1995, through source reduction, recycling, and composting activities; and (2) diversion of 50 percent of all solid waste on and after January 1, 2000, through source reduction, recycling, and composting facilities.[g]	State	**Consistent.** GHG emissions related to solid waste generation from the Project would benefit from this regulation as it would decrease the overall amount of solid waste disposed at landfills. The decrease in solid waste would then in return decrease the amount of methane released from the decomposing solid waste. City regulations require the Project to provide on-site recycling containers to promote the recycling of paper, metal, glass, and other recyclable materials.

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
Solid Waste (2 percent of project inventory)		
AB 341 (2011) amended the California Integrated Waste Management Act of 1989 to include a provision declaring that it is the policy goal of the state that not less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020, and annually thereafter.[h]		
Water (8.5 percent of project inventory)		
CCR, Title 24, Building Standards Code: The California Green Building Standards Code (Part 11, Title 24) includes water efficiency requirements for new residential and non-residential uses, in which buildings shall demonstrate a 20-percent overall water use reduction.	**State**	**Consistent.** By implementing project design features **PDF-GHG-2** through **PDF-GHG-9**, the Project would comply with applicable provisions of the 2017 Los Angeles Green Building Code, which in turn requires compliance with mandatory standards included in the California Green Building Standards (20-percent overall water use reduction).
Senate Bill X7-7: The Water Conservation Act of 2009 sets an overall goal of reducing per-capita urban water use by 20 percent by December 31, 2020. The state is required to make incremental progress toward this goal by reducing per-capita water use by at least 10 percent by December 31, 2015. This in an implementing measure of the Water Sector of the AB 32 Seeping Plan. Reduction in water consumption directly reduces the energy _necessary and the associated emissions to convene, treat, and distribute the water; it also reduces emissions from wastewater treatment.	State	**Consistent.** As discussed above under Title 24, the Project would meet this performance-based standard. In addition, project design features **PDF-GHG-2** through **PDF-GHG-9** include a specific list of water conservation measures. Examples include high-efficiency dual-flush toilets; and high-efficiency showerheads flow rate of 1.5 gallons per minute; and use of weather-based irrigation controllers with rain shutoff, matched precipitation (flow) rates for sprinkler heads, and rotating sprinkler nozzles or comparable technology such as drip/micro spray/subsurface irrigation. The Project thereby includes measures consistent with the GHG reductions sought by SB X7-7 related to water conservation and related GHG emissions.

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
Construction (9 percent of project inventory)		
The ARB's In-Use Off-Road Regulation: The ARB's in-use off-road diesel vehicle regulation ("Off-Road Diesel Fleet Regulation") requires the owners of off-road diesel equipment fleets to meet fleet average emissions standards pursuant to an established compliance schedule.	The ARB	**Consistent.** The CalEEMod emissions model uses historical data and ARB projections to determine the percentage of offroad diesel equipment that meet fleet average emission standards in each future year. Using this information, the model determined that regional criteria pollutant emissions during construction would be less than significant under CEQA. The model also used the diesel fleet regulation assumptions to calculate GHG emissions, which were found in the present analysis to be less than significant.
The ARB's In-Use On-Road Regulation: The ARB's in-use on-road heavy-duty vehicle regulation ("Truck and Bus Regulation") applies to nearly all privately and federally owned diesel fueled trucks and buses and to privately and publicly owned school buses with a gross vehicle weight rating greater than 14,000 pounds.[i]	The ARB	**Consistent.** The CalEEMod emissions model uses historical data and ARB projections to determine the percentage of onroad diesel trucks that meet emission standards in each future year. Using this information, the model determined that regional criteria pollutant emissions during construction would be less than significant under CEQA. The model also used the diesel fleet regulation assumptions to calculate GHG emissions, which were found in the present analysis to be less than significant.

a California Energy Commission, Utility Annual Power Content Labels for 2017, www.energy.ca.gov/pcl/labels/, accessed February 11, 2019.
b Senate Bi/1350 (2015-2016 Reg, Session) Stats 2015, Ch. 547.
c California Building Standards Commission, Energy Commission Approves More Efficient Buildings for California's Future, News Release, May 31, 2012.
d 2007b. Assembly Bi/11109 (2007-2008 Reg. Session) Stats. 2007, Ch. 534.
e California Air Resources Board, Initial Statement of Reason for Proposed Regulation for The Management of High Global Warming Potential Refrigerant for Stationary Sources, October 23, 2009.
f Carbon intensity is a measure of the GHG emissions associated with the various production, distribution, and use steps in the "life cycle" of a transportation fuel.
g Cal. Pub. Res. Code § 41780(a).
h Cal. Pub. Res. Code § 41780.01(a).
i California Air Resources Board. Truck and Bus Regulation-On-Road Heavy Duty Diesel Vehicles (In-Use) Regulation, www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm, page last reviewed December 20, 2018.

Source: Eyestone Environmental, as modified by UltraSystems Environmental, 2019.

Table 4.6-5
CONSISTENCY ANALYSIS – 2017 UPDATE

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
SB 350: SB 350, the Clean Energy and Pollution Reduction Act of 2015, increases the standards of the California RPS program by requiring that the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources be increased to 50 percent by 2030.[a] Required measures include: • Increase RPS to 50 percent of retail sales by 2030. • Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030. • Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in IRPs to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly-owned utilities meet GHG emissions reductions planning targets through a combination of measures as described in IRPs.	CPUC, CEC, ARB	**Consistent.** LADWP is required to generate electricity that would increase renewable energy resources to 33 percent by 2020 and 50 percent by 2030. As LADWP would provide electricity service to the Project Site, by 2030 the Project would use electricity consistent with the requirements of SB 350. Project buildout would occur in year 2024 and, therefore, the estimated GHG emissions from electricity usage provided below include implementation of SB 350 with a compliance date of 2030. As required under SB 350, doubling of the energy efficiency savings from final end uses of retail customers by 2030 would primarily rely on the existing suite of building energy efficiency standards under CCR Title 24, Part 6 (consistency with this regulation is discussed below) and utility-sponsored programs such as rebates for high-efficiency appliances, HVAC systems, and insulation. The Project's compliance with, and even exceedance of, the Title 24 building standards will complement the energy savings of using electricity from eligible energy resources.
Implement Mobile Source Strategy (Cleaner Technology and Fuels) • At least 1.5 million zero emission and plug-in hybrid light-duty electric vehicles by 2025. • At least 4.2 million zero emission and	ARB, CalSTA, SGC, Caltrans, CEC, OPR	**Consistent.** In 2012, ARB approved the Advanced Clean Cars Program, which establishes an emissions control program for model year 2017 through 2025. Standards under the Advanced Clean Cars Program will apply to all passenger and light duty trucks used by residents, employees, and deliveries to the Project. The Program also requires auto manufacturers to produce an increasing number of zero

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
plug-in hybrid light-duty electric vehicles by 2030. • Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean Cars regulations. • Implementation of federal phase 2 standards for medium- and heavy-duty vehicles • Innovative Clean Transit: Transition to a suite of to-be- determined innovative clean transit options. Assumed 20 percent of new urban buses purchased beginning in 2018 will be zero emission buses with the penetration of zero-emission technology ramped up to 100 percent of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low-NOX standard. • Last Mile Delivery: New regulation that would result in the use of low NOX or cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for class 3-7 last mile delivery trucks in California. This measure assumes ZEVs comprise 2.5 percent of new Class 3-7 truck sales in local fleets starting in 2020, increasing to 10 percent in 2025 and remaining flat through 2030. • Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; forthcoming statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy but included in the		emission vehicles in the 2018 through 2025 model years. Extension of the Advanced Clean Cars Program has not yet been adopted, but it is expected that measures will be introduced to increase GHG stringency on light duty autos and continue adding zero emission and plug in vehicles through 2030. The ARB is also developing the Innovative Clean Transit measure to encourage purchase of advanced technology buses such as alternative fueled or battery powered buses. This would allow fleets to phase in cleaner technology in the near future. The ARB is also in the process of developing proposals for new approaches and strategies to achieve zero emission trucks under the Advanced Clean Local Trucks (Last Mile Delivery) Program.[b,c] GHG emissions generated by Project-related vehicular travel would benefit from this regulation, and mobile source emissions generated by the Project would be reduced with implementation of standards under the Advanced Clean Cars Program, consistent with reduction of GHG emissions under AB 32. The Advanced Clean Cars Program would reduce $C0_2$ emissions from passenger vehicles from their model year 2012 levels by approximately 40 percent by model year 2025 (ARB, 2019b). Mobile source GHG emissions provided in **Table 4.6-3** conservatively exclude this additional 40-percent reduction in mobile source emissions as the CalEEMod model does not yet account for this regulation. Although the Innovative Clean Transit and Advanced Clean Local Truck Programs have not yet been established, the Project would also benefit from these measures once adopted. SB 375 requires SCAG to direct the development of the SCS for the region, which is discussed further below. The Project represents an infill development within an existing urbanized area that would concentrate new residential uses within a HQTA. Therefore, the Project would be consistent with SCAG's 2016-2040 RTP/SCS, as it is located within a HQTA. Furthermore, the 2016-2040 RTP/SCS would result in an estimated 18 percent decrease in per capita GHG emissions by 2035 and 21 percent decrease in per capita GHG

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
document "Potential VMT Reduction Strategies for Discussion."		emissions by 2040. As discussed above, the ARB updated the SB 375 targets for the SCAG region, requiring a 19-percent decrease in VMT by 2035. Implementation of the 2016-2040 RTP/SCS or the next plan is expected to fulfill and exceed the region's obligations under SB 375 with respect to meeting the State's GHG emission reduction goals. As discussed below, the Project results in a 60% reduction in VMT with a corresponding reduction in mobile GHG emissions reduction of approximately 56 percent (see **Appendix G** of this Draft EIR) compared to a Project without Reduction Features, which would be greater than the percent reduction targets in the 2016-2040 RTP/SCS. Therefore, the Project would be consistent with SB 375 and the 2016-2040 RTP/SCS.
Increase Stringency of SB 375 Sustainable Communities Strategy (2035 Targets)	ARB	**Consistent** Under SB 375, the ARB sets regional targets for GHG emission reductions from passenger vehicle use. In 2010, the ARB established targets for 2020 and 2035 for each region. As required under SB 375, the ARB is required to update regional GHG emissions targets every 8 years. Targets were last updated in March 2018. As part of the 2018 updates, the ARB has adopted a passenger vehicle related GHG reduction of 19 percent for 2035 for the SCAG region, which is more stringent than the current reduction target of 13 percent for 2035. The Project would be consistent with SB 375 for developing an infill project within an existing urbanized area. This would concentrate new residential uses within an HQTA. Project-related transportation emissions would be reduced by approximately56 percent and, therefore, the Project would be consistent with SB 375 and the 2016-2040 RTP/SCS. See further analysis on the 2016-2040 RTP/SCS, below.
By 2019, adjust performance measures used to select and design transportation facilities. Harmonize project performance with emissions reductions, and increase competitiveness of transit and active transportation modes (e.g. via guideline documents, funding programs, project selection, etc.).	CalSTA and SGC, OPR, ARB, GoBiz, IBank, DOF, CTC, Caltrans	**Not Applicable.** The Project would not involve construction of transportation facilities. However, the Project Site is located within about 0.25 mile from several Metro routes. The Project would benefit from these bus routes by encouraging use of mass transit resulting in a reduction of Project-related vehicle trips to and from the site.

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
Adopt a Low Carbon Fuel Standard with a Cl reduction of 18 percent.	ARB	**Not Applicable.** This regulatory program applies to fuel suppliers, not directly to land use development.[d] GHG emissions related to vehicular travel associated with the Project would benefit from this regulation because fuel used by Project-related vehicles would be required to comply with LCFS. Mobile source GHG emissions provided in **Table 4.6-3** were calculated using CalEEMod. However, CalEEMod does not include implementation of the LCFS into mobile source emission factors. The current LCFS, adopted in 2007, requires a reduction of at least 10 percent in the carbon intensity (CI) of California's transportation fuels by 2020. On September 27, 2018, the ARB approved an amendment to the LCFS regulation to require a 20-percent reduction in Cl from a 2010 baseline by 2030. Reductions in Cl are phased in starting in 2019 with a reduction of 6.25 percent and increases by 1.25 percent each year.
By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.	ARB, CalRecycle, CDFA, SWRCB, Local air districts	**Not Applicable.** Under SB 1383, the California Department of Resources Recycling and Recovery (CalRecycle) is responsible for achieving a 50% reduction in the level of statewide disposal of organic waste from the 2014 level by 2020 and 75-percent reduction by 2025. As of March 2018, CalRecycle is currently holding workshops to review draft regulatory language. Adoption of the regulations to achieve SB 1383 targets is expected in early 2019.[f] The Project would be consistent with AB 341, which requires not less than 50 percent of solid waste generated be source reduced through recycling, composting or diversion. Reduction in solid waste generated by the Project would reduce overall GHG emissions. Compliance with AB 341 would also help achieve the goals of SB 1383.

Source: ARB, 2017c, unless otherwise specified.

a Senate Bill 350 (2015-2016 Regular Session) Stats 2015, Ch. 547.

b ARB, Advanced Clean Cars, Midterm Review, www.arb.ca.gov/msprog/acclacc-mtr.htm.

c ARB, Advanced Clean Local Trucks (Last mile delivery and local trucks), www.arb.ca.gov/msproglactrucklactruck.htm.

d ARB, LCFS Rulemaking Documents, www.arb.ca.govlfuels/lcfs/rulemakingdocs.htm.

e ARB, Short-Lived Climate Pollutants (SLCP): Organic Waste Methane Emissions Reductions, www.calrecycle.ca.gov/climatelslcp/.

In view of the findings in Table 4.6-4 and Table 4.6-5, the Project would be consistent with the GHG reduction-related actions and strategies in the 2008 AB 32 Scoping Plan and subsequent updates, and related impacts would be less than significant.

2016-2040 RTP/SCS

The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (SCAG, 2016) contains measures that are expected to significantly reduce vehicle miles traveled (VMT) in southern California, and thereby reduce GHG emissions. The analysis in **Section 4.2.5.1** demonstrates the Project's consistency with the growth projections in the 2016-2040 RTP/SCS. The analysis took into account development such as the Project in its modeling and analyses and the 2016-2040 RTP/SCS vehicle trip and VMT reduction goals and policies.

The strategies and policies of the 2016-2040 RTP/SCS for reducing GHG emissions in the SCAG region can be grouped into three categories: (1) reducing vehicle trips and VMT, (2) increased use of alternative fuel vehicles, and (3) increased energy efficiency.

Reducing Vehicle Trips. According to the CalEEMod analysis for the Project, annual VMT in the operational phase would be 2,545,524. (See **Appendix G**.) As discussed in **Section 4.2.5.1**, the site population is estimated to be 656. Daily per capita VMT would therefore be 10.47. This is below the daily per capita VMT of 18.4 that the RTP/SCS predicts for 2040. Therefore, the Project is compatible with the 2016-2040 RTP/SCS.

Increased Use of Alternative Fueled Vehicles. The Project will neither help nor hinder implementation of this measure.

Increased Energy Efficiency. Project design features **GHG-PDF-1** and **GHG-PDF-12** would reduce the use of energy by the Project. **GHG-PDF-12**, in particular, would prevent combustion of natural gas and thus reduce GHG emissions. Therefore, the Project is compatible with the 2016-2040 RTP/SCS.

In consideration of the above, the Project would be consistent with the GHG reduction-related actions and strategies in the 2016-2040 RTP/SCS, and related impacts would be less than significant.

LA Green Plan/ClimateLA

As discussed in **Section 4.6.2.2**, the City of Los Angeles has implemented the LA Green Plan, which outlines the goals and actions that the City has established to reduce the generation and emission of GHGs from public and private activities. The LA Green Plan has the goal of reducing emissions of CO_2 to 35% below 1990 levels by the year 2030. To achieve this goal, the City is increasing the generation of renewable energy, improving energy conservation and efficiency, and changing transportation and land use patterns to reduce dependence on automobiles. **Table 4.6-6** summarizes LA Green Plan elements that are potentially relevant to the Project, along with an analysis of the Project's consistency with them.

Table 4.6-6
CONSISTENCY WITH APPLICABLE GHG EMISSIONS GOALS AND ACTIONS OF LA GREEN PLAN

Action		Description	Consistency Analysis
Focus Area: Energy			
E6	Present a comprehensive set of green building policies to guide and support private sector development.	The City embarked on an effort to establish green building requirements, paired with incentives, for medium- to large-private projects. Buildings account for a majority of electricity use. Each building site is a microcosm of the environmental issues faced by the City, so addressing each site in a comprehensive manner will provide a variety of environmental benefits.	**Consistent.** While this action primarily applies to the City, the Project would be designed and operated to meet or exceed the applicable requirements of the state Green Building Standards Code and the City of Los Angeles Green Building Code.
Focus Area: Water			
W1	Meet all additional demand for water resulting from growth through water conservation and recycling.	The Mayor's Office and LADWP developed the *Securing LA's Water Supply* plan, which is an aggressive, multi-faceted approach to developing a locally sustainable water supply. The plan includes a set of key short- term and long-term strategies to secure our water future, such as: Short-Term Conservation Strategies: • Enforcing prohibited uses of water (levying fines and sanctions against water abusers and increase water conservation awareness). • Expanding the list of prohibited uses of water (possible further restrictions on watering landscape andwashing/rinsing vehicles without a self-closing nozzle). • Extending outreach efforts, water conservation incentives, and rebates.	**Not Applicable, but Benefits the Project** While this action primarily applies to the City and LADWP, the Project would incorporate water conservation features to reduce indoor water use by at least 20 percent, including high-efficiency dual-flush toilets; high-efficiency showerheads flow rate of 1.5 gallons per minute; tankless and on-demand water heaters installed in non-residential restrooms, among others.

Action		Description	Consistency Analysis
Focus Area: Water			
		• Encouraging regional conservation measures (encourage all water agencies in the region to adopt water conservation ordinances which include prohibited uses and enforcement). Long-Term Conservation Strategies: • Increasing water conservation through reduction of outdoor water use and new technology. • Maximizing water recycling. • Enhancing stormwater capture. • Accelerating clean-up of the groundwater basin. • Expanding groundwater storage	
W2	Reduce per capita water consumption by 20 percent	See W1, above.	See W1, above.
Focus Area: Transportation			
T8	Promote walking and biking to work, within neighborhoods, and to large events and venues.	Promoting alternate modes of travel will reduce the carbon emissions associated with single-occupancy vehicles. As described in Action Items LU1 and LU2, the City is promoting high-density and mixed-use housing close to major transportation arteries. Such developments will also support the advancement of Action Item T8, by improving accessibility for those who wish to walk and bike to work.	**Consistent.** While this action primarily applies to the City, the Project represents an infill development within an existing urbanized area that would concentrate new residential uses within a HQTA. The Project Site is located approximately 0.25 mile from the several Metro routes. In addition, the Project would provide residents, employees, and visitors with convenient access to public transit and opportunities for walking and biking, including the installation of bicycle parking spaces in accordance with LAMC requirements.

Action		Description	Consistency Analysis
Focus Area: Land Use			
LU1	Promote high-density housing close to major transportation arteries.	With 469 square miles, Los Angeles is a vast and sprawling city. Yet many neighborhoods are walkable, with stores and services clustered near dense residential housing. As the city continues to redevelop and grow, there is an unprecedented opportunity to rethink the urban environment. Accommodating continued growth requires taking advantage of infill opportunities and increasing density along transit corridors.	**Consistent.** The Project represents an infill development within an existing urbanized area that would ***concentrate new*** residential uses within a HQTA. The Project Site is within about 0.25 mile of several Metro routes.
LU2	Promote and implement transit- oriented development (TOD).	TODs represent opportunities for creating cohesive, vibrant, walkable communities where fragmented, auto-dependent corridors now exist. TODs are a positive alternative to low-density traditional land use patterns that typically segregate housing, jobs and neighborhood services from one another. In contrast, TODs cluster these community elements in close proximity, so a greater portion of trips can be made by transit, bike, or on foot.	**Consistent.** The Project constitutes a TOD as the Project would concentrate new residential uses in proximity to public transit opportunities. The study area is well served by public transit. The Project Site is located within about 0.25 mile of several Metro routes.
Focus Area: Waste			
WsT1	Reduce or recycle 70 percent of trash by 2015.	Source reduction and recycling programs not only conserve natural resources and landfill space, but also confer climate benefits.	**Consistent**. While this action primarily applies to the City, the Project would provide, as required by the City,[a] onsite recycling containers to promote the recycling of paper, metal, glass, and other recyclable materials.

[a] Los Angeles Municipal Code, Article 2, § 12.21(19)(c).

The proposed Project does not conflict with any of the proposed actions addressed in the LA Green Plan and the LA Green Building Code that allows the City to meet their goals, therefore the proposed Project impacts related to conflict with policies for reduction of GHG emissions would be less than significant.

4.6.4 Cumulative Impacts

It is widely recognized that no single project could generate enough GHG emissions to noticeably change the global climate. However, the combination of GHG emissions from past, present, and future projects could contribute substantially to global climate change. Thus, Project-specific GHG emissions

should be evaluated in terms of whether they would result in a cumulatively significant impact on global climate change. Climate change impacts may include an increase in extreme heat days, higher concentrations of air pollutants, sea level rise, impacts on water supply and water quality, public health impacts, impacts on ecosystems, impacts on agriculture, and other environmental impacts.

As was shown in **Section 4.6.3.3**, the Project will result in lower GHG emissions per capita than it has now. In addition, the Project is consistent with state and local plans and programs to reduce state and regional GHG emissions, including the ARB's AB 32 Scoping Plan (and updates thereto), the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, and the LA Green Plan/ClimateLA. The Project's incremental contribution to GHG emissions and their effects on climate change would not be cumulatively considerable. **For these reasons, the Project's cumulative contribution to global climate change is less than significant.**

4.6.5 Mitigation Measures

As discussed above, the Project would result in less than significant impacts related to GHG emissions and no mitigation measures are required. The Project would comply with applicable requirements of the LA Green Plan and the LA Green Building Code that allows the City to meet their goals for reduction of GHG emissions.

4.6.6 Level of Significance After Mitigation

Through compliance with state mandates and other applicable regulatory requirements, impacts related to GHG emissions would be less than significant.

4.7 Hazards and Hazardous Materials

4.7.1 Introduction

The following discussion describing existing environmental conditions with respect to hazardous materials is based largely on information from the Phase I Environmental Site Assessment Report (ESA) that was prepared for the Project by Altec Testing & Engineering, Inc. (Altec, 2018; revised January 14, 2019), as well as previous studies conducted at the site of the Project by Altec (2016a, 2016b). This analysis presents the baseline conditions existing at the Project Site and one-quarter mile around the site at the time this analysis was written.

4.7.2 Environmental Setting

4.7.2.1 Regulatory Framework

Federal

Occupational Safety and Health Administration

The federal Occupational Safety and Health Administration (OSHA) enforces regulations covering the handling of hazardous materials in the workplace. The regulations established in the Code of Federal Regulations (CFR) Title 29 are designed to protect workers from hazards associated with encountering hazardous materials at the work site. The regulations require certain training, operating procedures, and protective equipment to be used at work sites where hazardous materials may be encountered.

Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)

CERCLA, otherwise known as the Superfund law, was enacted in 1980 by Congress, creating a federal authority responsible for responding to releases or threatened releases of hazardous materials that can become a threat to public health or the environment. CERCLA also provides the legal framework for dealing directly with abandoned properties containing hazardous waste and liability of potential responsible parties for the release of hazardous waste. It established a fund for cleanup costs when no responsible party is identified.

Resource Conservation and Recovery Act (RCRA)

RCRA is a federal law that provides authority over the disposal of solid and hazardous waste including "cradle to grave" requirements. RCRA's cradle to grave authority includes managing every step of a particular waste stream, including the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also provides the legal framework for the management of nonhazardous waste.

Frank R. Lautenberg Chemical Safety for the 21st Century Act

On June 22, 2016, President Obama signed the Frank R. Lautenberg Chemical Safety for the 21st Century Act (Lautenberg Act), which updated the Toxic Substances Control Act of 1976 (TSCA). The TSCA enabled the EPA to track over 75,000 chemicals produced or shipped into the United States from abroad. The Lautenberg Act strengthened the TSCA by requiring the EPA to evaluate existing chemicals with clear and enforceable deadlines, requiring risk-based chemical assessments; and

requiring increased public transparency for chemical information. The Lautenberg Act also provided for a consistent source of funding for the EPA to carry out its responsibilities under the Act.

Emergency Planning & Community Right-to-Know Act

Authorized by Title III of the Superfund Amendments and Reauthorization Act (SARA), the Emergency Planning & Community Right-to-Know Act (EPCRA; 42 U.S.C. §11001 et seq. [1986]) was enacted by Congress as the national legislation on community safety. This law is designed to help local communities protect public health, safety, and the environment from chemical hazards.

The Emergency Planning and Community Right-to-Know Act (EPCRA) was passed in 1986 in response to concerns regarding the environmental and safety hazards posed by the storage and handling of toxic chemicals. These concerns were triggered by the 1984 disaster in Bhopal, India, caused by an accidental release of methylisocyanate. The release killed or severely injured more than 2,000 people.

To reduce the likelihood of such a disaster in the United States, Congress imposed requirements for federal, state and local governments, tribes, and industry. These requirements covered emergency planning and "Community Right-to-Know" reporting on hazardous and toxic chemicals. The Community Right-to-Know provisions help increase the public's knowledge and access to information on chemicals at individual facilities, their uses, and releases into the environment. States and communities, working with facilities, can use the information to improve chemical safety and protect public health and the environment (USEPA, 2019).

To implement EPCRA, Congress requires each state to appoint a State Emergency Response Commission (SERC). The SERCs are required to divide their states into Emergency Planning Districts and to name a Local Emergency Planning Committee (LEPC) for each district (see California State Emergency Response Commission [SERC], LEPC Region I).

State

California State Emergency Response Commission (SERC)

Per the requirements of EPCRA, the California State Emergency Response Commission (SERC) established six emergency planning districts having the same boundaries as the Mutual Aid Regions. The SERC appointed a LEPC for each planning district, known as regions, and supervises and coordinates their activities. LEPC Region I is comprised of Los Angeles, Orange, San Luis Obispo, Santa Barbara, and Ventura (CalOES, 2019).

LEPC Regions provide a forum for emergency management agencies, responders, industry and the public to work together to evaluate, understand, train about, coordinate and communicate chemical hazards in the community and develop regional hazmat emergency plans. The Plans are reviewed and updated as necessary, and provide information about chemicals in the community to citizens, government agencies and emergency responders. (CalOES, 2019)

Department of Toxic Substances Control

Within the California Environmental Protection Agency (Cal/EPA), the Department of Toxic Substances Control (DTSC) is the responsible governing body that regulates the generation, handling, treatment, and disposal of hazardous waste in the State of California. The DTSC and the State Water

Resources Control Board (SWRCB; per the Porter-Cologne Water Quality Control Act of 1969) regulate the cleanup activities of hazardous waste sites in California that have caused contamination in soil and groundwater.

Enforcement and Emergency Response Division (EERD)

The Department of Toxic Substances Control's (DTSC) Enforcement and Emergency Response Division (EERD), a division of the Hazardous Waste Management Program, is committed to promoting and supporting continual program evaluation and enhancements to ensure equitable, consistent, and timely enforcement; and enhancing public transparency and accessibility.

The EERD administers the technical implementation of the state's Unified Program - a consolidation of six environmental programs at the local level Certified Unified Program Agencies; (CUPAs). In Los Angeles County, the County of Los Angeles Fire Department Health Hazardous Materials Division is the Los Angeles County CUPA. The Los Angeles County CUPA administers the following programs within the County: the Hazardous Waste Generator Program, the Hazardous Materials Release Response Plans and Inventory Program, the California Accidental Release Prevention Program (Cal-ARP), the Aboveground Storage Tank Program, and the Underground Storage Tank Program (LACFD, 2019)

Title 22 of the California Code of Regulations (CCR)

Title 22, Division 4.5, § 66250 (Hazardous Waste Management System: General) to § 69599 (Safer Consumer Products) of the CCR contains the State of California hazardous waste regulations that are enforced by the DTSC.

California Occupational Safety and Health Administration (CAL/OSHA)

Federal and state occupational safety and health laws contain requirements regarding the handling of hazardous waste concerning worker safety, training, and right-to-know. Authority to enforce federal Occupational Safety and Health Administration (OSHA) requirements has been delegated to California OSHA (CAL/OSHA), which has developed provisions that are at least as stringent as those enforced at the federal level. CAL/OSHA regulates and enforces occupational and public safety laws protecting the public and workers from safety hazards.

California Public Resources Code (PRC) § 21151.4

The PRC § 21151.4 stipulates that an environmental impact report shall not be certified or a negative declaration shall not be approved for any project involving the construction or alteration of a facility within one-fourth of a mile of a school that might reasonably be anticipated to emit hazardous air emissions, or that would handle an extremely hazardous substance or a mixture containing extremely hazardous substances in a quantity equal to or greater than the state threshold quantity specified pursuant to subdivision (j) of Section 25532 of the Health and Safety Code , that may pose a health or safety hazard to persons who would attend or would be employed at the school, unless both of the following occur:

(1) The lead agency preparing the environmental impact report or negative declaration has consulted with the school district having jurisdiction regarding the potential impact of the project on the school.

(2) The school district has been given written notification of the project not less than 30 days prior to the proposed certification of the environmental impact report or approval of the negative declaration.

(b) As used in this section, the following definitions apply:

(1) "Extremely hazardous substance" means an extremely hazardous substance as defined pursuant to paragraph (2) of subdivision (g) of Section 25532 of the Health and Safety Code.

(2) "Hazardous air emissions" means emissions into the ambient air of air contaminants that have been identified as a toxic air contaminant by the State Air Resources Board or by the air pollution control officer for the jurisdiction in which the project is located. As determined by the air pollution control officer, hazardous air emissions also means emissions into the ambient air of a substance identified in subdivisions (a) to (f), inclusive, of Section 44321 of the Health and Safety Code.

California Health and Safety Code Section 105430(a)

California Health and Safety Code § 105430(a) requires that any radon assessment and mitigation plan include appropriate measures designed to detect, avoid, or dissipate dangerous levels of radon gas at potential building sites or during construction of new residential buildings in areas affected by radon. Any of those measures must be appropriately delineated so as to apply only to certain at-risk buildings and geographic areas, and the plan shall specify construction projects, building characteristics, and geographical areas to which the measures apply, to assure ease of compliance and consistency with the findings and assessment of the USEPA regarding radon risks. The plan may include reasonable provisions for testing and detection of radon at potential building sites as well as measures to provide for the appropriate radon-dissipating ventilation and insulation of new residential construction consistent with prevailing techniques.

Safe Drinking Water and Toxic Enforcement Act of 1986 (27 CCR § 25102 et. seq.)

The Safe Drinking Water and Toxic Enforcement Act (Proposition 65) was originally adopted by California voters in 1986 as Proposition 65. Proposition 65 requires businesses to provide warnings to Californians about significant exposures to chemicals that cause cancer, birth defects or other reproductive harm. These chemicals can be in the products that Californians purchase, in their homes or workplaces, or that are released into the environment. By requiring that this information be provided, Proposition 65 enables Californians to make informed decisions about their exposures to these chemicals.

Proposition 65 also prohibits California businesses from knowingly discharging significant amounts of listed chemicals into sources of drinking water. Per Proposition 65, California is required to publish a list of chemicals known to cause cancer, birth defects or other reproductive harm. This list, which must be updated at least once a year, has grown to include approximately 900 chemicals since it was first published in 1987.

Local

South Coast Air Quality Management District

South Coast Air Quality Management District (SCAQMD) Rule 1403, Asbestos Emissions from Renovation/Demolition Activities, regulates asbestos as a toxic material and controls the emissions of asbestos from demolition and renovation activities by specifying agency notifications, appropriate removal procedures, and handling and cleanup procedures. Rule 1403 applies to owners and operators involved in the demolition or renovation of structures with asbestos-containing materials, asbestos storage facilities, and waste disposal sites.

City of Los Angeles Fire Department

The Los Angeles Fire Department (LAFD) monitors the storage of hazardous materials in the City of Los Angeles for compliance with local requirements. Specifically, businesses and facilities which store more than threshold quantities of hazardous materials as defined in Chapter 6.95 of the California Health and Safety Code are required to file an Accident and Risk Prevention Program with the LAFD. This program includes information such as emergency contacts, phone numbers, facility information, chemical inventory, and hazardous materials handling and storage locations.

City of Los Angeles 2018 Local Hazard Mitigation Plan

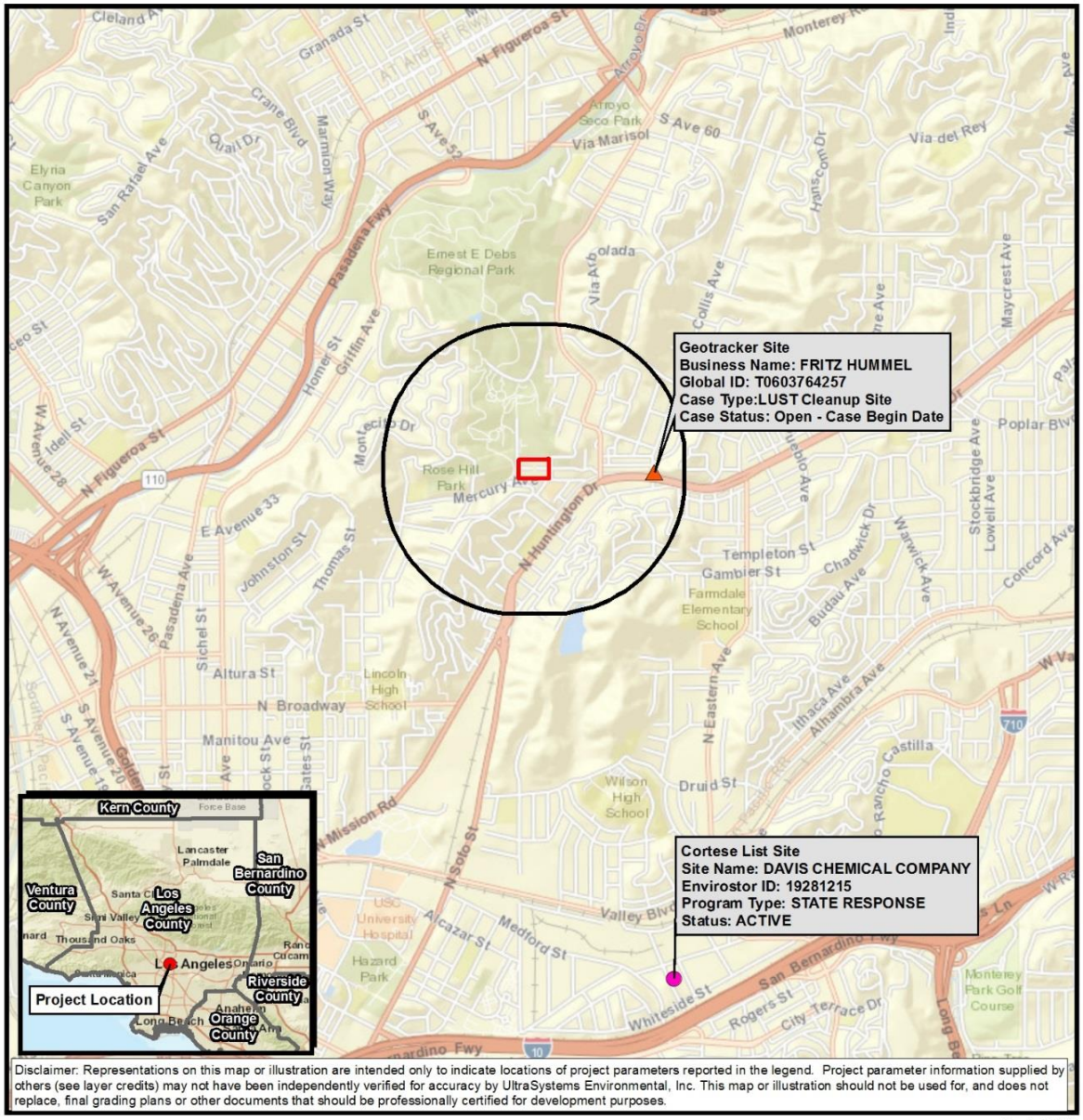
The City of Los Angeles 2018 Hazard Mitigation Plan (HMP) was prepared to lessen the City's vulnerability to disasters related to, among other things, incidents related to the manufacture, transportation, storage, and use of hazardous materials, including radioactive materials (Tetra Tech, 2018). The HMP discusses the types of hazardous materials and radiological hazards most likely to be situated in the City of Los Angeles, and the most likely primary and secondary impacts caused by the accidental or intentional release of hazardous materials including exposure to people, property, critical facilities and infrastructure, and the environment (Tetra Tech, 2018).

4.7.2.2 Existing Conditions

The Phase I ESA (Altec, 2018; revised January 14, 2019), reviewed historical land use of the Project Site; from 1923 through 1938, the site of the Project, as well as the areas north and west, is developed with single-family homes. The existing housing complex was developed in 1942, and in aerial photos from 1948 through 2017 the site appears unchanged. Prior to the development of the existing buildings, the past uses of the site included low residential or vacant land dating back to 1920. Details of the land use of the adjoining properties can be found in the ESA located in **Appendix K1** (Altec, 2018, pp. 32-36).

The California Department of Toxic Substances Control maintains a list of Hazardous Waste and Substances Sites (Cortese List), which provides information about the locations of hazardous materials release sites (DTSC, 2019). As detailed in the Phase I ESA conducted in April 2018 for the Project Site by Altec, multiple Cortese sites were identified within a ¼-mile radius of the Project (Altec, 2018); the two sites nearest to the Project are shown on **Figure 4.7-1**, Cortese Sites. The ESA determined that none of these sites pose more than a low risk to the Project (Altec, 2018).

Figure 4.7-1
CORTESE SITES



Path: J:\Projects\6022A_HACLA_Rose_Hill\MXDs\S_MND\6022A_HACLA_4_8_Cortese_Sites_2018_03_01.mxd
Service Layer Credits: Sources: Esri, HERE, DeLorme, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), MapmyIndia, NGCC, © OpenStreetMap contributors, and the GIS User Community; Cal Fire, 2007; Envirostor Database, November 29, 2016; Geotracker Database, November 29, 2016; UltraSystems Environmental, Inc., 2018

March 1, 2018

Scale 1:31,680

N

0 0.25 0.5 Miles

0 0.25 0.5 Kilometers

Legend

- Project Boundary
- Half-Mile Radius
- LUST Cleanup Site (Geotracker Site 11-29-16 Database)
- DTSC Cortese Site

Rose Hill Courts Redevelopment

Cortese Sites

UltraSystems

As discussed in the ESA (Altec, 2018), several technical studies were previously conducted for the Project Site. These include a lead hazard reduction workplan prepared in 2008; an asbestos abatement/lead-related demolition closeout report, a lead hazard stabilization monitoring closeout report, and an abatement workplan in 2009; a limited asbestos and lead-based paint (LBP) sampling and visual mold assessment in 2012; a Phase I environmental site assessment in 2016; a limited lead testing in 2016 and revised limited lead sampling report in 2017 (Altech, 2016b; **Appendix K2**); and a limited asbestos sampling report in 2017 (Altec, 2018).

Some of the aforementioned studies of the Project Site found asbestos containing materials (ACM) and LBP. Some soil contaminated with LBP was removed throughout the site in 2008 and, as mentioned above, workplans to address those issues were developed in 2008 and 2009. According to the Phase I ESA conducted in 2016 by Altec, potential Recognized Environmental Conditions (RECs) onsite included lead in soil (below California regulatory limits) along building foundations, lead in soil in child play areas and at other exposed locations, and a moderate potential for indoor radon gas levels. The 2016 Phase I ESA also found a potential for lead in drinking water, water damage/mold growth and/or the potential for mold in units due to a water leak (Altec, 2016a, pp. 53, 56). Refer to **Appendices K1 and K2** for more details about the findings of the above studies. The results of these studies are summarized below.

ACM: Asbestos is a hazardous air pollutant that is regulated under the federal Clean Air Act. Its control has been delegated to the SCAQMD under its Rule 1403. The federal OSHA also regulates asbestos as a potential worker safety hazard. According to the ESA (Altech, 2018; **Appendix K1**) and the limited lead sampling report (Altech, 2016b; **Appendix K2**), limited asbestos removal was conducted at Units 3, 14 and the administration building in 2008. Asbestos-containing flooring and ceramic tiles were also removed. A limited asbestos (and lead-based paint) sampling was conducted for Units 3 and 14 and the administration building on August 28, 2012. Additionally, asbestos sampling was performed on June 7, 2016 in the interiors of eight vacant apartment units and the administration building. ACMs were identified to be present in the samples collected (Altec, 2018, p. 38).

LBP: Since the Rose Hill Courts buildings were built before 1978, LBP was identified at the site in previous assessments and subsequent removal/stabilization work was performed for Units 1-6 and 95-100, the administration building, and soil contaminated with LBP was removed throughout the site in 2008. LBP was also removed from two of the apartment units and the administration building in 2012. LBP was identified at the site during paint sampling and soil sampling performed June 7, 2016 and December 5, 2016 (Altec, 2016b) (refer to **Appendix K2).**

HUD requires Public Housing Authorities to test their housing units built before 1978 for the presence of lead-based paint and to notify residents of the results. In compliance with this requirement, HACLA has been providing LBP notifications (HACLA, n.d.) to all their residents at Rose Hill Courts since at least 1986. A copy of this notification is included in **Appendix K3**. This notification states that LBP testing was performed at the Rose Hill Courts Development and some positive results were found. The notification explains what areas LBP was found, the health risks, steps the residents can take to protect their families from lead poisoning, contact information, and an attachment with further information.

Furthermore, HACLA sent a letter to all the residents of Rose Hill Courts to notify them of the results of testing for lead and asbestos conducted at the Project Site in June and December 2016. A copy of this letter dated April 11, 2017 is included in **Appendix K4.** The letter explained that tests were conducted to determine the concentration of lead in the unit interiors, exteriors and in soil around

the perimeter of all structures as well as in the playground. The letter further that testing confirmed the presence of LBP in the unit interiors and exteriors, as previously known and disclosed to all residents and enclosed a copy of the previous notice discussed and included in **Appendix K3.** Lead present in the soil is discussed below.

Lead in soil. Lead was identified to be present in soil along existing building foundations. According to the ESA (Altec, 2018), soil contaminated with lead paint was removed throughout the site in 2008. Limited lead testing was performed by Altec, which covered paint sampling and soil sampling, on June 7, 2016 and December 5, 2016. For details of the lead test results, see the Revised Report for Limited Lead Testing (Altec, 2016b), which is included in **Appendix K2**. The most protective screening level for lead in residential soil in California is 80 milligrams per kilogram (mg/kg). Lead is present at concentrations above 80 mg/kg in the foundation/dripline soil around Buildings #2, #6, #7, #9, #11, #12, #13, and #14. However, lead levels in the soils were found to be well below California regulatory limits. Lead levels in the soils at the Project Site range from 5.4 mg/kg in the playground area to 200 mg/kg around the building edges, compared to the regulatory limit for 400 mg/kg for child play areas and 1,000 mg/kg for all other areas.

As discussed above, HACLA sent a letter to all the residents of Rose Hill Courts to notify them of the results of testing for lead and asbestos conducted at the Project Site in June and December 2016. A copy of this letter dated April 11, 2017 is included in **Appendix K4.**

Lead in drinking water. The Phase I ESA identified a potential for the presence of lead in drinking water associated with the leaching of lead from existing plumbing components, including water supply lines (Altec, 2018, p. 48). The LADWP (2017c) conducted water sampling for lead at the Project Site in September 15 (Initial), October 12 (Resample), and December 21 (Round 2) 2016. Water samples were first collected from six vacant units in September 2016. Four of these six samples resulted in elevated levels of lead but the required pre-testing flushing had not occurred in those units so additional samples were collected from one vacant and one occupied unit in October 2016. This time pre-flushing was performed on the vacant unit and the lead result was low. In addition, the lead result for the occupied unit was non-detect. In an effort to try and obtain a more representative subsampling of the 100 units at Rose Hill Courts, thirteen samples were collected from units (four vacant and nine occupied) throughout the complex on December 21, 2016. The lead levels in drinking water collected from all the occupied units were low or non-detect. However, the lead levels in drinking water collected from vacant units were only low or non-detect 100 percent of the time if pre-flushing was performed. The LADWP provided details regarding the testing for lead in the water at the Project Site in a letter to HACLA in April 2017 (LADWP, 2017c), which is included in **Appendix K5**.

Radon: As discussed in the ESA (Altech, 2018), radon gas has been found in all counties of California. According to the map published by the State of California Geological Survey (CGS) in January 2005 entitled Radon Potential Map for Southern Los Angeles County, California, (CGS, 2005) the Project Site is in an area that has been designated as an area with a moderate potential for the presence of radon gas at 4.0 picocuries/liter (pCi/L). The Project Site is located on a geologic map unit on which 6 to 20 percent of associated residences tested positive for radon levels that equaled or exceeded the USEPA action level of 4.0 pCi/l (CGS, 2016).

Radon is a colorless, odorless, naturally occurring, radioactive, inert, gaseous element formed by radioactive decay of radium atoms. Radon gas moves readily through rock and soil along microfractures and through pore spaces between mineral grains. Radon gas moves from the soil into buildings in various ways. It can move through cracks in slabs or basement walls, pores and cracks

in concrete blocks, through-going floor-wall joints, and openings around pipes. Radon moves into buildings from the soil when air pressure inside the buildings is lower than the air pressure outside. When exhaust fans are used, or the inside air is heated, or wind is blowing across the building, the building's internal air pressure is lowered. Because radon enters buildings from the adjacent soil, its concentrations are typically highest in basements and ground floor rooms.

4.7.3 Project Impacts

4.7.3.1 Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, the Project would have a significant impact regarding hazards and hazardous materials if it would:

Threshold (a): ***Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; or***

Threshold (b): ***Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment; or***

Threshold (c): ***Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school; or***

Threshold (d): ***Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment; or***

Threshold (e): ***For a project located within 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 result in a safety hazard or excessive noise for people residing or working in the project area; or***

Threshold (f): ***Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or***

Threshold (g): ***Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.***

Thresholds of Significance from CEQA Appendix G were used to evaluate the potential level of initial impact and the potential level of impact after implementation of mitigation measures.

4.7.3.2 Methodology

Prior to determining potential impacts resulting from construction of the Project, the ESA (Altec, 2018) was reviewed in depth, and database searches for Cortese sites were conducted to ensure that the status of these sites was unchanged since the ESA was conducted in 2018. In addition, information on the hazards of lead, asbestos, and radon to humans and to the environment, was collected from the websites of federal agencies such as the USEPA, and from California agencies such as CGS and the SCAQMD.

For the purpose of this analysis, the severity of potential impacts related to hazardous substances would be associated with the potential mobilization of hazardous materials through demolition processes, excavation of contaminated soil, or handling of hazardous materials, resulting in exposure to humans and the environment. Conditions of contamination could exist as either the result of previous land use residuals, or as the result of accidental releases related to construction and operation of the Project. Hazardous materials encountered during construction of the Project would require special handling to minimize risks of human and environmental exposure.

Exposure to hazardous materials may result in short-term or long-term health effects, which may include but are not limited to, eye or skin irritation, allergic reactions, headache, disorientation, nausea, and chronic illness, depending on the extent of human exposure and the hazardous materials involved. Hazardous materials that would potentially be encountered or used during Project activities include flammable substances, carcinogenic (known to cause cancer) substances, or corrosive materials (chemically active compounds with the potential to cause material damage or skin burns upon contact). Examples of common flammable substances include gasoline; examples of carcinogens include asbestos and heavy metals such as lead; and examples of corrosive substances include battery acid (found in car batteries) and strong acids or bases often used during construction, such as solvents.

Excavated soil would be classified as hazardous waste if the soil contaminants exceeded criteria identified in CCR Title 22. Such soil would require remediation (treatment) onsite, would be transferred to an offsite processing facility, or transported to a disposal facility that is permitted to accept such wastes. Excavated areas would then be backfilled by clean imported soil.

When determining the severity of impacts, it was assumed that the Project and all contractors would comply with all applicable federal, state, and local laws and regulations regarding hazardous materials. Specific mitigation measures are designed to minimize or avoid potential impacts resulting from construction and operation of the Project, and are recommended when it is determined that Project design or best management practices would not fully mitigate an impact. Many of the recommended mitigation measures were proposed in the Project's Phase I ESA (Altec, 2018).

4.7.3.3 Analysis of Project Impacts

Threshold (a): Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction and operation of the Project would involve transport, storage, and use of chemical agents, solvents, paints, and other hazardous materials. Chemical transport, storage, and use would comply with RCRA, CERCLA, OSHA, California hazardous waste control law,[49] Division of OSHA, SCAQMD, Los Angeles County Department of Public Health and LAFD requirements.

Construction, onsite maintenance, and operation of the Project would involve storage and use of small amounts of commercially-available janitorial and landscaping supplies. These materials would be used, stored, handled, and disposed of in accordance with applicable regulations.

Compliance with federal, state, and local regulations regarding the routine transport, use, or disposal of hazardous materials would minimize or avoid impacts related to hazardous materials. **Therefore, it is not anticipated that the Project would create a significant hazard to the public or the**

49 Codified in California Health and Safety Code, Division 20, Chapter 6.5, Hazardous Waste Control.

environment through the routine transport, use, or disposal of hazardous materials and impacts would be less than significant.

Threshold (b): ***Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?***

Recognized Environmental Conditions

The following Recognized Environmental Conditions (i.e., ACM, LBP, lead, and radon gas) were identified on the Project Site (Altec, 2018).

ACM. Since the existing site has construction material that contains asbestos, the resulting construction debris would have to be disposed of at a landfill that can accept asbestos. The nearest acceptable landfill would be Waste Management Inc.'s Azusa Land Reclamation site at 1211 West Gladstone in Azusa (Waste Management, 2018), approximately 23 miles from the Project Site. All ACMs, LBP, and lead in plumbing components and/or water supply lines identified on the Project Site would be removed prior to demolition, as required, and in accordance with all applicable laws, including guidelines of the OSHA. **With removal of these hazardous materials prior to demolition, as required, and in accordance with all applicable laws, impacts from ACMs would be less than significant.**

LBP: LBP was identified at the site during paint sampling and soil sampling performed June 7, 2016 and December 5, 2016 (Altec, 2016b) (refer to **Appendix K2**). **As with the ACM discussed above, all** LBP and any materials on the site that contain LBP, would be removed prior to demolition, as required, and in accordance with all applicable laws, including guidelines of the OSHA. **With demolition of the existing buildings, in accordance with all applicable laws, impacts from LBP would be less than significant.**

Lead in soil. Lead was identified to be present along existing building foundations/perimeters. The most protective screening level for lead in residential soil in California is 80 mg/kg. Therefore, Altec recommends using this level for residential properties. Lead is present at concentrations above 80 mg/kg in the foundation/dripline soil around Buildings #2, #6, #7, #9, #11, #12, #13, and #14. A less conservative screening or clearance level of 1,000 mg/kg (published in California Code of Regulations Title 17 § 35036) was used for a soil removal effort performed at Rose Hill Courts in 2008; however, the Project indicated that the target property will be remediated to 80 mg/kg (Altec, 2018, p. 51) as required by HSC § 5708. For details of the lead test results, see the Revised Report for Limited Lead Testing performed by Altec, which covered paint sampling and soil sampling performed June 7, 2016 and December 5, 2016 (Altec, 2016b), which is **Appendix K2** to this EIR. **With the implementation of mitigation measure HAZ-1, potential impacts related to lead in soil would be less than significant.** See **Section 4.7.7**.

Lead in Drinking Water. There is a potential for lead to be in drinking water as a result of its leaching from plumbing components, including water supply lines. Considering that existing buildings on the Project Site would be demolished, lead in drinking water sampling does not appear to be necessary at this time (Altec, 2018, p. 51). **Because all buildings on the Project Site would be demolished, and the new plumbing installed would be required to meet current standards for lead content, there would be no potential impacts regarding lead in drinking water for future Project tenants.**

Indoor radon gas. The CGS map of Indoor Radon Potential indicates that the Project is in an area with moderate potential for indoor radon gas levels at 4.0 pCi/L (CGS, 2005; Altec, 2018, p. 51). Due to the potential for indoor radon gas levels in excess of the USEPA standard of 4.0 pCi/L, mitigation will be required to reduce this potentially significant impacts related to indoor levels of radon gas upon completion of the Project. The Project will incorporate foundation design measures to prevent radon present from entering the new residences. Proposed building plans would be reviewed by the City of Los Angeles to determine if additional precautions are needed to mitigate potential radon gas impacts. **Implementation of mitigation measure HAZ-2 would reduce potential impacts from radon.** See **Section 4.7.7**.

Threshold (c): Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Our Lady of Guadalupe School (TK – 8) is located approximately 50 feet east of the Project Site. The Project is anticipated to store and use products such as fuel, cleaning products, etc. during the construction phase. Upon Project buildout, it is anticipated that residents could store small amounts of potentially hazardous substances such as cleaning products. Onsite maintenance may include the use and storage of pest and weed control substances, which would be stored and used per applicable laws and regulations. These commercially available janitorial and landscaping supplies during operation would not be used in quantities sufficient to cause a potential hazard.

The Project would be required to comply with notice and consultation requirements applicable to schools in Public Resources Code (PRC) § 21151.4 (of the CEQA statute) and state CEQA Guidelines § 15186. PRC § 21151.4, which pertains to projects within 0.25 mile of a school, contains requirements regarding certification of environmental documents for projects that might reasonably be anticipated to emit hazardous air emissions or that would handle extremely hazardous substance or a mixture containing such substances in a quantity equal to or greater than the state threshold quantity specified pursuant to subdivision (j) of § 25532 of the Health and Safety Code. Since the Project would be the same residential use as the existing use at the site, no hazardous air emissions are anticipated to be emitted and no extremely hazardous substances or mixtures containing such substances are expected to be stored or used at the site.

While the Project is within 0.25 mile of an existing school, removal of ACMs, LBPs, and lead in plumbing components and/or water supply lines will be completed in accordance with all applicable laws and mitigation measures and would not result in a potential hazard.

The limited quantities of hazardous materials, as described above, are unlikely to pose a risk to schools in the Project vicinity. Furthermore, occupancy of the proposed residential development would not cause hazardous substance emissions or generate hazardous waste. **Therefore, it is concluded that the Project would result in less than significant impacts at any existing or proposed schools within 0.25 mile of the Project Site.**

Threshold (d): Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

As discussed in the Initial Study prepared for the Project, included as **Appendix B** of this Draft EIR, the Project Site is listed on the California Environmental Protection Agency (CalEPA) DTSC HAZNET database for "other organic solids" removed for offsite disposal in 2003 and 1998. Listing on the

HAZNET database is not of concern for the Project because the organic solids were removed and disposed of offsite. Furthermore, since the Project Site was not identified on the Cortese List, the Project would have a less than significant impact in this regard. **Therefore, there would be a less than significant impact with respect to Threshold (d) and no mitigation is required.**

Threshold (e): ***For a project located within 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 result in a safety hazard or excessive noise for people residing or working in the project area?***

As discussed in the Initial Study prepared for the Project, included as **Appendix B** of this Draft EIR, the Project is not located within the boundary of an Airport Influence Area, or within two miles of a public airport or public use airport. For these reasons, the Project would not expose people to safety hazards due to proximity to a public airport, and no impacts would occur. **Therefore, there would be no impact with respect to Threshold (e) and no mitigation is required.**

Threshold (f): ***Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?***

As discussed in the Initial Study prepared for the Project, included as **Appendix B** of this Draft EIR, and in **Section 4.14**, Wildfire, of this Draft EIR, the project site is not directly accessed by a road designated as a disaster route. However, a portion of Huntington Drive, located within 1,000 feet southeast of the Project Site, is a designated disaster route.

Construction

Construction activities for the Project would be primarily confined to the Project Site and would only include minor offsite improvements in the public right-of-way for utilities such as water, sewer, and electricity. These offsite improvements would be limited to only the public right-of-way in the streets surrounding the Project Site; Florizel Street, Boundary Avenue, McKenzie Avenue, and Mercury Avenue.

In addition, a Construction Management Plan will be implemented during construction of the Project to ensure that adequate and safe access remains available within and near the Project Site during construction activities. The Construction Management Plan will detail how parking will be managed during Phase I and Phase II of Project construction. The parking management plan will specify where onsite and offsite parking will be available during both phases of Project construction. The Construction Management Plan will include a street closure plan that details how vehicle traffic (including bus traffic, and potential temporary bus stop closure or relocation along Mercury Avenue), pedestrian traffic, and bicycle traffic will flow during temporary street closures during both Phase I and Phase II of Project construction.

The Project Site is not adjacent to nor accessed by a road designated as a disaster route. The Project would also comply with all applicable codes and ordinances for emergency access. Therefore, with adherence to regulatory requirements and implementation of a Construction Management Plan, construction of the project would not impair implementation of, or physically interfere with, any adopted or onsite emergency response or evacuation plans. **Therefore, there would be no impacts related to an adopted emergency response plan or emergency evacuation plan during construction.**

Operation

During operation, the Project would not involve any activities that would impede public access or travel along the public right-of-way or interfere with an adopted emergency response or evacuation plan. As discussed in **Section 4.13**, Transportation, of this Draft EIR, the Project site plan will be reviewed by the Los Angeles Fire Department and the Project complies with all emergency access and sight-line requirements. Therefore, the Project would not result in inadequate emergency access during operation and no impacts would occur. In addition, the increase in traffic generated by the Project would not significantly impact emergency vehicle response to the Project Site and surrounding uses, including along City-designated disaster routes since the drivers of emergency vehicles are able to avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Refer to **Section 4.11**, Public Services, of this Draft EIR, for a detailed analysis regarding emergency response. **Therefore, there would be no impacts associated with emergency response and emergency evacuation plans.**

Furthermore, the Project would not include a land use that would constitute a potential hazard to the community (such as an airport, oil refinery, or chemicals plant), nor would it close any existing streets or otherwise represent a significant impediment to emergency response and evacuation of the local area. **The Project's proposed land uses would not require a new, or interfere with an existing, risk management, emergency response, or evacuation plan. Therefore, the Project would have no impact with respect to Threshold (f) and no mitigation is required.**

Threshold (g): Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

As discussed in **Section 4.14**, Wildfire, in this Draft EIR, the Project Site is not located within a State Responsibility Area (SRA) Fire Hazard Severity Zone but it is located within a Local Responsibility Area (LRA) Very High Fire Hazard Severity Zone. The Project would include required fire suppression design features. The landscape design would include plant materials that are both drought tolerant and fire retardant, a permeant automatic irrigation system, and landscaping would be maintained on regular schedule. Furthermore, the Project would be required to comply with City of Los Angeles Building Code and safety regulations pertaining to development in a Very High Fire Hazard Severity Zone. The Project is required to comply with all applicable chapters of the City of Los Angeles Fire Code. With compliance with all applicable regulations, the Project would have less than significant impacts related to risk of loss, injury or death involving wildland fires. See **Section 4.14**, Wildfire. **Therefore, the Project would have a less than significant impact with respect to Threshold (g) and no mitigation is required.**

4.7.4 Cumulative Impacts

Construction and operation of the Project would involve transport, storage, and use of chemical agents, solvents, paints, and other hazardous materials. Chemical transport, storage, and use would comply with RCRA; CERCLA; OSHA; California hazardous waste control law; Division of OSHA; SCAQMD; Los Angeles County Department of Public Health; and City of LAFD requirements. Construction, onsite maintenance, and operation of the Project would involve storage and use of small amounts of commercially available janitorial and landscaping supplies. These materials would be used, stored, handled, and disposed of in accordance with applicable regulations. It is anticipated that future projects would be required to comply with these applicable regulations and thus cumulative impacts regarding hazardous materials from future projects wouldn't be cumulatively considerable. **With implementation of mitigation and compliance with applicable laws, the**

Project would result in less than significant impacts regarding hazards and hazardous materials and the Project's contribution would be cumulatively less than considerable. Therefore, the Project would have less than significant cumulative impacts regarding hazards and hazardous materials.

4.7.5 Mitigation Measures

As discussed above in Threshold (b), lead is present at concentrations above 80 mg/kg in the foundation/dripline soil around Buildings #2, #6, #7, #9, #11, #12, #13, and #14. Additionally, the Project Site is in an area that has a moderate potential for indoor radon gas levels at 4.0 pCi/L (CGS, 2005; Altec, 2018, p. 51). Due to the presence of lead in the soils and the potential for indoor radon gas levels in excess of the USEPA standard of 4.0 pCi/L, the following mitigation will be required to reduce potentially significant impacts of lead and radon:

HAZ-1: Due to the presence of lead in the soil at the Project Site, a Soil Management Plan (SMP) shall be prepared. Prior to the commencement of grading and excavation, the Project Applicant shall retain a qualified environmental consultant to prepare a SMP that complies with all applicable regulatory requirements. The SMP shall be submitted to the City of Los Angeles Department of Building and Safety for review and approval prior to the commencement of excavation and grading activities. The SMP shall contain the following:

- The recommendations of the HHMD and LAFD.
- The SMP shall require that the Project Applicant to remove and properly dispose of impacted materials in accordance with applicable requirements of the DTSC, and County of Los Angeles Fire Department.
- The SMP shall require that contaminated soils be transported from the Project Site by a licensed transporter and disposed of at a licensed storage/ treatment facility to prevent contaminated soils from becoming airborne or otherwise released into the environment.
- The SMP shall be implemented during excavation and grading activities.
- A qualified environmental consultant shall be present on the Project Site during grading and excavation activities in the known or suspected locations of contaminated soils, and shall be on call at other times as necessary, to monitor compliance with the SMP and to actively monitor the soils and excavations for evidence of contamination.

HAZ-2: Prior to issuance of the Building Permit(s), the Project Applicant shall consult with the City of Los Angeles Department of Building and Safety regarding radon at the Project Site. After construction of each Phase, radon testing shall be conducted on the Project Site to confirm if radon concentrations in the new buildings on the Project Site exceed the USEPA action level of 4.0 pCi/L. The results of the radon tests shall be provided to the City of Los Angeles Department of Building and Safety. The Project Applicant shall implement any recommendations from the City of Los Angeles Department of Building and Safety regarding radon.

4.7.6 Level of Significance after Mitigation

The Project would be compliant with federal, state, and local regulations for removal of lead in the soil and the potential for radon at the Project Site. **With implementation of mitigation measures HAZ-1 and HAZ-2 above, the Project would comply with existing local, state, and federal regulations governing removal of lead in the soil and radon exposure, and impacts would be less than significant with mitigation incorporation.**

4.8 Land Use and Planning

4.8.1 Introduction

This section of the Draft EIR provides an analysis of the Project's potential impacts with regard to land use. Specifically, this section analyzes the Project's consistency with applicable land use plans, policies and regulations.

4.8.2 Environmental Setting

4.8.2.1 Regulatory Framework

Federal

There are no federal regulations that pertain to this issue area.

State/Regional

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is the designated regional planning agency for the following six counties in Southern California: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. SCAG is a Joint Powers Authority under California state law, established as an association of local governments that voluntarily convene to address regional issues. Under federal law, SCAG is designated as a Metropolitan Planning Organization and under state law as a Regional Transportation Planning Agency and a Council of Government (SCAG, 2018). SCAG creates regional plans addressing transportation, growth management, hazardous waste management and air quality.

A. SCAG Regional Comprehensive Plan

SCAG's most recent Regional Comprehensive Plan (RCP), was released on February 9, 2009. The RCP is a major advisory plan that addresses important regional issues like housing, traffic/transportation, water, and air quality. The RCP serves as an advisory document to local agencies in the Southern California region for their information and voluntary use for preparing local plans and handling local issues of regional significance (SCAG, 2008).

The RCP responds to SCAG's Regional Council directive in the 2002 Strategic Plan to develop a holistic, strategic plan for defining and solving our inter-related housing, traffic, water, air quality, and other regional challenges. The RCP describes what could happen if current trends continue, defines a vision for a healthier region, and recommends an Action Plan that could get us there by 2035. By balancing resource conservation, economic vitality, and quality of life, it lays out a long-term planning framework that shows how we can respond to growth and infrastructure challenges in a comprehensive way. The RCP recommends more integrated resource planning, but does not mandate it. The RCP encourages local governments to consider the RCP's recommendations in General Plan updates, municipal code amendments, design guidelines, incentive programs and other actions (SCAG, 2008, p.2). The 2008 RCP includes nine chapters that focus on specific areas of planning or resource management: Land Use and Housing; Open Space and Habitat; Water; Energy; Air Quality; Solid Waste Transportation; Security; and Emergency Preparedness; Economy (SCAG, 2008, p.3).

B. Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

In April 2016, SCAG's Regional Council adopted the 2016-2040 RTP/SCS, which presents a vision for the region in 2040 and analyzes the impacts of its decisions, policies, strategies and development projects on the environment, the economy and social equity. The RTP/SCS is a major planning document for our regional transportation and land use network. The 2016-2040 RTP/SCS envisions vibrant, livable communities that are healthy and safe with transportation options that provide easy access to schools, jobs, services, health care and other basic needs (SCAG, 2016, p. 13).

The 2016–2040 RTP/SCS provides the transportation vision for the region through the year 2040 and provides a long-term investment framework for addressing regional transportation and related challenges (SCAG, 2016, p. 17).The 2016-2040 RTP/SCS places emphasis on sustainability and integrated planning, and identifies mobility, accessibility, sustainability and high quality of life, as the principals most critical to the future of the region. The RTP/SCS balances the region's future mobility and housing needs with economic, environmental and public health goals. The RTP/SCS is required by the State of California and the federal government and is updated by SCAG every four years as demographic, economic and policy circumstances change. The 2016-2040 RTP/SCS is a living, evolving blueprint for the region's future (SCAG, 2016, p. 2).

SCAG is required by California housing law to conduct a Regional Housing Needs Assessment (RHNA) every eight years. This assessment determines future housing needs for every jurisdiction in a given region for a specific time period. This determination is referred to as the RHNA allocation, which represents projected housing needs for an eight-year period, as required by state law. For the fifth RHNA cycle (the period between January 2014 and October 2021), the regional RHNA allocation was 412,137 units, broken down as follows: 100,632 very low; 64,947 low; 72,053 moderate; and 174,505 above moderate. Although these housing units are planned and zoned for, available data sources indicate that the supply of affordable housing has not met needs, despite strong building activity for market-rate housing (SCAG, 2016, p. 22).

The 2016-2040 RTP/SCS includes plans for "High-Quality Transit Areas", "Livable Corridors", and Neighborhood Mobility Areas" as key features of a thoughtfully planned, maturing region in which people benefit from increased mobility. More active lifestyles, increased economic opportunity, and an overall higher quality of life (SCAG, 2016, p. 2). High-Quality Transit Areas include generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15 minute or less service frequency during peak commute hours (SCAG, 2016, p.189). Livable corridors are defined as arterial roadways where local jurisdictions may plan for a combination of high-quality bus frequency, higher density residential and employment at key intersections, and increased active transportation through dedicated bikeways (City of Los Angeles, 2019, p. IV.G-13). Neighborhood Mobility Areas include areas with roadway networks where Complete Streets and sustainability policies support and encourage replacement of automobile use with biking, walking, skateboarding, and slow-speed electric vehicles. Local jurisdictions are encouraged to focus housing and employment growth with High-Quality Transit Areas (SCAG, 2016, p. 76). The Project Site is located in the vicinity of High-Quality Transit Areas identified in Exhibit 5.1 in the 2016-2040 RTP/SCS.

Air Quality Management Plan

The South Coast Air Quality Management District's Air Quality Management Plan (AQMP) is a regional blueprint for achieving air quality standards and healthful air. The most recent 2016 AQMP represents a comprehensive analysis of emissions, meteorology, atmospheric chemistry, and regional growth projections (SCAQMD, 2018). Additional discussion of the AQMP, and the Project's consistency with the AQMP, is addressed in **Section 4.2** of this document.

Metro Congestion Management Program

As the Congestion Management Agency for Los Angeles County, the Los Angeles County Metropolitan Transportation Authority (Metro) is responsible for implementing the Congestion Management Program (CMP). State statute requires that a CMP be developed, adopted and updated biennially for every county that includes an urbanized area and shall include every city and the county government within that county. The Metro Board adopted the 2010 CMP for Los Angeles County in October of 2010. CMP implementation guidelines for local jurisdictions are contained in the 2010 CMP (Metro, 2018). The Project's consistency with the CMP is discussed in **Section 4.12** of this document.

Local

City of Los Angeles General Plan

All cities and counties are required by state law to prepare and adopt a long-range comprehensive General Plan to guide future development and to identify the community's environmental, social, and economic goals. As detailed in § 65302 of the California Government Code, "The general plan shall consist of a statement of development policies and shall include a diagram or diagrams and text setting forth objectives, principles, standards, and plan proposals." (California Legislative Information, 2017).

The City of Los Angeles General Plan, originally adopted in 1974, is a long-range comprehensive plan that provides principles, policies, and objectives to guide future development and meet existing and future needs of the City. The General Plan consists of seven elements including Land Use, Transportation, Noise, Safety, Housing, Open Space, and Conservation, mandated by the State of California. Additionally, the General Plan includes elements for addressing Air Quality, Infrastructure Systems, Public Facilities and Services, Health and Wellness, and the Citywide General Plan Framework Element. The Land Use Element comprises 35 local area plans known as Community Plans that guide land use and development at the local level. The Project Site is located within the Northeast Los Angeles Community Plan area.

The City of Los Angeles' Citywide General Plan Framework Element (Framework Element) establishes the broad overall policy and direction for the entire General Plan. It provides a citywide context and a long-range strategy to guide the comprehensive update of the General Plan's other elements. The City's 35 Community Plans collectively comprise the Land Use Element of the General Plan. The City's General Plan has the following elements: Plan for a Healthy Los Angeles, Framework Element, Air Quality Element, Conservation Element, Housing Element, Noise Element, Open Space Element, Service Systems Element/Public Recreation Plan, Safety Element, and Mobility Element.

City of Los Angeles General Plan Framework Element

The City's General Plan Framework Element, which was adopted in 1996 and readopted in August 2001, is a strategy for long-term growth which sets a citywide context to guide the update of the community plan and citywide elements. The Framework Element sets forth a citywide comprehensive long-range growth strategy. It defines citywide policies that will be implemented through subsequent amendments of the City's community plans, zoning ordinances, and other pertinent programs. The General Plan Framework defines citywide policies that influence most of the City's General Plan Elements and it includes policies for: land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, and infrastructure/public services (City of Los Angeles Department of City Planning, 2018a).

A. Land Use

The General Plan Framework Land Use Chapter provides objectives to support the viability of the City's residential neighborhoods and commercial and industrial districts. The Land Use Chapter establishes the following categories of land use: Neighborhood District, Community Center, Regional Center, Downtown Center, and Mixed-Use Boulevard. These land use categories are broadly described by ranges of intensity/density, heights, and lists of typical uses.

Table 3-1, Land Use Standards and Typical Development Characteristics, of the General Plan Framework lists the following as typical characteristics/uses for Multi-Family Residential:

- Multi-family dwelling units.
- Supporting uses (parks, schools, community centers, etc.).
- Low Medium I: 10-17 dwelling units/net acre.
- Low Medium II: 18-29 dwelling units/net acre.
- Medium: 30-55 dwelling units/net acre.
- High Medium: 56-109 dwelling units/net acre.
- High: 110-218 dwelling units/net acre.
- Densities may be adjusted to achieve neighborhood stability and quality of life (refer to policies for factors to be considered).

B. Housing

The purpose of the Housing Chapter in the Framework Element is to present an overview of the critical issues related to housing in Los Angeles, provide goals to guide future action, and policies to address housing issues (City of Los Angeles Department of City Planning, 2018a). The Housing Chapter's goal is to define the distribution of housing opportunities by type and cost for all residents of the City.

C. Urban Form and Neighborhood Design

The General Plan Framework Element defines "urban form" as (a) the "general pattern of building height and development intensity" and (b) the "structural elements" that define the City physically, such as natural features, transportation corridors (including the planned

fixed-rail transit system), open space, public facilities, as well as activity centers and focal elements. "Neighborhood design" is defined as the physical character of the neighborhoods and communities within the City (City of Los Angeles Department of City Planning, 2018a). The Urban Form and Neighborhood Design Chapter of the Framework Element's intent is to build on each neighborhood's attributes, emphasize livability for existing and future residents, and reinforce the connectivity of the neighborhoods to a citywide structure (City of Los Angeles Department of City Planning, 2018a). The Framework Element does not address the design of individual neighborhoods or communities, directly. It provides neighborhood design and implementation programs that guide local community planning.

D. Open Space and Conservation

"Open space" encompasses both publicly- and privately-owned properties that are unimproved and used for the preservation of natural resources, managed production of resources, outdoor recreation, and protection of life and property due to natural hazards (City of Los Angeles Department of City Planning, 2018a). The Open Space and Conservation Chapter contains open space goals objectives and policies for resource conservation and management, outdoor recreation, public safety, community stability, and resources development. The Open Space and Conservation policies also examine ways that the City of Los Angeles may create and utilize open space, particularly in parts of the City where there is a significant deficiency (City of Los Angeles Department of City Planning, 2018a).

E. Economic Development

The economic development policies in the City's Framework Element are designed to facilitate business retention and job growth in several ways, including providing appropriate sites and infrastructure to accommodate future commercial and industrial growth; streamlining the City's permitting and regulatory processes; focusing the City's economic development efforts to more effectively utilize available resources; and, where appropriate, providing financial incentives to attract development to targeted districts, centers, and boulevards (City of Los Angeles Department of City Planning, 2018a).

F. Transportation

A comprehensive strategy of physical and operational improvements and behavioral changes that reduce the number and length of trips generated is necessary to ensure future mobility in the City. New facilities and services will greatly enhance accessibility within communities, particularly in these communities with limited economic resources. These efforts must be continued and enhanced through a strategic transportation implementation program for the transportation system envisioned in the Framework Element to be realized (City of Los Angeles Department of City Planning, 2018a). The goals of the Transportation Chapter include provision of adequate accessibility to commerce, work opportunities, and essential services, and maintenance of acceptable levels of mobility for all people living, working, traveling or moving goods in the City. The Transportation Chapter of the Framework Element is implemented through the Mobility Plan 2035, described in detail below.

G. Infrastructure and Public Services

The policies of the Infrastructure and Public Services Framework Element seek solutions to public infrastructure and service deficiencies, including their expansion commensurate with

the levels of demands experienced. The goals, objectives and policies found within this section address thirteen infrastructure and public service systems, many of which are interrelated, and all of which will help support the City's population and economy as it moves into the 21st century. The systems include: wastewater, stormwater, water, solid waste, police, fire, libraries, parks, power, schools, telecommunications, street lighting, and urban forest (City of Los Angeles Department of City Planning, 2018a).

Health and Wellness Element (Plan for a Healthy Los Angeles)

The Plan for a Healthy Los Angeles is the Health and Wellness Element of the General Plan, which lays the foundation to create healthier communities for all Angelenos. The Plan accomplishes two policy objectives: 1) it elevates existing health-oriented policies in the General Plan and, 2) where policy gaps exist, creates new policies to reinforce the City's goal of creating healthy, vibrant communities. The Plan acknowledges the relationship between public health and issues such as transportation, housing, environmental justice, and open space, among others, by reviewing the relevant policies in the General Plan and identifying where further policy direction is needed to achieve the goal of creating a healthy and sustainable City (City of Los Angeles Department of City Planning, 2018a, p. 6). The Plan for a Healthy Los Angeles identifies the following primary goals, and related policies and programs for creating healthier neighborhoods.

- Los Angeles, a Leader in Health and Equity: Recognize the complexity of the issues behind poor health outcomes and the multidisciplinary and collaborative approach needed to uproot health disparities.

- A City Built for Health: Use design, construction and public services to promote the physical, mental, and social well-being of its residents and make it easier for people to shop, buy fresh produce, visit a doctor, have meaningful social interactions, breathe cleaner air, and live and age in their community, across income levels and physical abilities.

- Bountiful Parks and Open Spaces: Support opportunities for physical activity, offer safe havens for families and children, provide spaces for social interaction, provide access to nature, and offer mental respite.

- Food that Nourishes the Body, Soul and Environment: Include food resources that make the healthiest choice the easiest choice in all neighborhoods, while also supporting sustainable food growth and distribution within and beyond the City's jurisdiction to encourage healthy living and create a resilient, healthy and equitable food system.

- An Environment Where Life Thrives: Provide a healthy environment, where residents are less susceptible to health concerns related to poor air quality and increased exposure to environmental hazards and toxins.

- Lifelong Opportunities for Learning and Prosperity: Focus on improving education attainment, enhancing opportunities for learning at all stages of life, and workforce development, with the goal of enhancing opportunities for economic prosperity.

- Safe and Just Neighborhoods: Create safe communities through community-based public safety initiatives and increase access to gang prevention resources, which includes access to economic and educational opportunities and collaborative relationships with public safety officials.

Air Quality Element

The Air Quality Element of the City of Los Angeles sets forth the goals, objectives and policies which will guide the City in the implementation of its air quality improvement programs and strategies. With adoption of the Air Quality Element and the Clean Air Program, the City is seeking to achieve consistency with regional Air Quality, Growth Management, Mobility and Congestion Management Plans (City of Los Angeles Department of City Planning, 2018a).

Conservation Element

The emphasis in the Conservation Element is on conservation and preservation of natural resources. The City's goal is to preserve, protect and enhance its existing natural and related resources (City of Los Angeles Department of City Planning, 2018a, p. II-1). The City has a primary responsibility in protecting significant archaeological and paleontological resources (City of Los Angeles Department of City Planning, 2018a, p. II-5). The cultural and historical objective is to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes (City of Los Angeles Department of City Planning, 2018a, p. II-9).

Housing Element

The City of Los Angeles adopted the 2013-2020 Housing Element in December of 2013. The Housing Element of the City's General Plan identifies the City's housing conditions and needs, establishes the goals, objectives, and policies that are the foundation of the City's housing and growth strategy, and provides the array of programs the City intends to implement to create sustainable, mixed-income neighborhoods across the City (City of Los Angeles Department of City Planning, 2018a, p. cxiii). The four primary goals identified in the City's Housing Element include the following:

- A City where housing production and preservation result in an adequate supply of ownership and rental housing that is safe, healthy, sanitary, and affordable to people of all income levels, races, ages, and suitable for their various needs.
- A City in which housing helps to create safe, livable and sustainable neighborhoods.
- A City where there are housing opportunities for all without discrimination.
- A City committed to ending and preventing homelessness.

Chapter 1, Housing Needs Assessment of the City of Los Angeles General Plan states (City of Los Angeles Department of City Planning, 2018a, p. 1-78): Under California state law, every jurisdiction is obligated to provide housing to meet its "fair share" of the regional need. The California Department of Housing and Community Development (HCD) is mandated to determine the state-wide housing need for a given planning period. In order to do this, the HCD works with regional Councils of Government (COGs) to determine growth projections for the areas they represent. This growth projection is then translated into a RHNA, which consists of the total number of new units required to meet the growth needs. For the RHNA cycle from January 1, 2014 through September 30, 2020, the HCD determined that the City of Los Angeles needs to provide 82,001 units. Of these, 20,426 are for very low-income, 12,435 are for low-income, 13,728 are for moderate income and 35,412 are for above moderate-income households (City of Los Angeles Department of City Planning, 2018a, pp. 1-78 and 1-79).

As of December 2018, the City of Los Angeles has not currently met their RHNA goals, as detailed in data provided by HCD, the City of Los Angeles is listed as a city that is subject to Senate Bill 35[50] streamlining provisions because it has made insufficient progress towards its Lower income RHNA (Very Low and Low income) requirements (HCD, 2018a, p. 5). Additionally, as detailed in HCD's 5th Cycle Annual Progress Report Permit Summary (HCD, 2018b), the City of Los Angeles has:

- Only met 15.5 percent of its Very Low Income (VLI) housing requirements (17,263 VLI units remain to be constructed).
- Only met 18.2 percent of its Lower Income (LI) housing requirements (10,173 LI units remain to be constructed).
- Only met 1.9 percent of its Moderate Income (MI) housing units (13,466 units remain to be constructed).
- Exceeded its Above Moderate Income (AMI) housing units by 152.9 percent (0 units remain to be constructed- 54,151 units have been constructed).

Noise Element

The noise element applies to the city as a whole. It addresses noise mitigation regulations, strategies and programs and delineates federal, state and city jurisdiction relative to rail, automotive, aircraft and nuisance noise. Regulation of noise relative to vehicles is largely outside the authority of municipal government. Primary municipal authority relates to regulation of land use, implementing federal and state regulations and enforcing nuisance noise. This element describes noise management programs of each jurisdictional entity, as they relate to the City of Los Angeles (City of Los Angeles Department of City Planning, 2018a, p. xiii).

Open Space Element

The purpose of this element of the City's General Plan is to provide a guide for the identification, preservation, conservation, and acquisition of open space in the City. This element includes goals, objectives, policies and programs directed towards the regulation of privately-owned lands for the benefit of the public (City of Los Angeles Department of City Planning, 2018a, p. 1).

Service Systems Element/Public Recreation Plan Element

This element emphasizes neighborhood and community recreation sites, community buildings, gymnasiums, swimming pools and tennis courts and sets forth recreation standards intended to provide a basis for satisfying the needs for neighborhood and community recreational sites (City of Los Angeles Department of City Planning, 2018a, p. 1).

Safety Element

This element provides a contextual framework for understanding the relationship between hazard mitigation, response to a natural disaster and initial recovery from a natural disaster. Because flood,

50 Senate Bill 35, which took effect on January 1, 2018, applies to cities and counties that have not made sufficient progress toward their affordable housing goals for above-moderate and lower income levels. If it is determined that the jurisdiction's RHNA goals are not met, the bill requires that cities and counties streamline their review and provide ministerial approval for qualifying affordable housing projects. This process entails a shorter time frame for project review and approval and eliminates the need for public hearings (California Legislative Information, 2017b).

fire and seismic events, geologic features and potential hazards relate to each other and transcend the City's boundaries, this element takes into account other jurisdictions and governmental entities (City of Los Angeles Department of City Planning, 2018a, p. I-I).

Mobility Plan 2035

This element of the City's General Plan provides the policy foundation for achieving a transportation system that balances the needs of all road users. As an update to the City's General Plan Transportation Element (last adopted in 1999), Mobility Plan 2035 incorporates "complete streets" principles. The Complete Streets Act, adopted under Assembly Bill 1358 in 2008, requires local jurisdictions to "plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban or urban context." Five main goals identified in Mobility Plan 2035 include: 1) Safety first; 2) World-Class Infrastructure; 3) Access for all Angelenos; 4) Collaboration, Communication and Informed Choices; and 5) Clean Environments and Healthy Communities. Mobility Plan 2035 contains objectives and policies for achieving its identified goals for mobility in the City.

City of Los Angeles Walkability Checklist

The City of Los Angeles Walkability Checklist for Site Plan Review (i.e., Walkability Checklist) is a program for implementation of the urban design principles identified in the Urban Form and Neighborhood Design Chapter of the Framework Element. The Walkability Checklist encourages pursuit of high-quality City form and has been incorporated into the Citywide Design Guidelines. It informs stakeholders about the tools and techniques that improve curb appeal, beauty, and usability through a location-specific approach (City of Los Angeles Department of City Planning, 2008). The purpose of the Walkability Checklist is to guide the City of Los Angeles Department of City Planning staff, developers, architects, engineers, and all community members in creating enhanced pedestrian movement, access, comfort, and safety–contributing to the walkability of the City. The Walkability Checklist provides a list of recommended strategies that projects should employ to improve the pedestrian environment in the public right-of-way and on private property. The checklist is not a requirement and is not part of the zoning code. However, it serves as a guide for consistency relating to the policies contained in the General Plan Framework Element (City of Los Angeles Department of City Planning, 2008, p. 1).Different components related to walkability and pedestrian experience discussed in the Walkability Checklist include building orientation, building frontages, signage and lighting, landscaping, off-street and on-street parking, driveways, sidewalks, cross-streets/street crossings, utilities, street connectivity, access to transit, aesthetics, and street furniture.

Los Angeles Municipal Code and Los Angeles Hillside Ordinance

The City of Los Angeles Municipal Code (LAMC) identifies different zoning designations and includes development standards that regulate development within different zoning designations. The Project Site is zoned for residential uses and has a zoning designation of [Q]R1-1D. The R1 classification reflects single-family residential development. Therefore, the existing Rose Hill Courts development is a legal non-conforming land use because the existing development has multi-family housing units. The Project proposes multi-family development that is a Public Benefit Project with Alternative Compliance approval under Los Angeles Municipal Code § 14.00.B. Additionally, the applicant is requesting an Affordable Housing Density Bonus (SB 1818), as identified in LAMC § 12.22 A.25, with off-menu incentives. Providing a Public Benefit Project with Alternative Compliance as well as a

Density Bonus would allow for the Project to be constructed without a General Plan Amendment or zone change from the City of Los Angeles.

The Qualified zone classification "Q" reflects the Northeast Los Angeles Hillside Ordinance because the Project Site is located within an area of the City designated as Northeast Los Angeles Hillside. Steep topography, narrow streets, and outdated infrastructure characterize the immediate area. Unique development standards applied to the site under this zoning classification address building height, floor area ratio, percent of lot coverage, and building setbacks.

Citywide Design Guidelines

The Citywide Design Guidelines were adopted in July 2013 to help guide the City staff, developers, architects, engineers and community members in evaluating project applications and project consistency with relevant policies provided in the Framework Element and Community Plans. The Citywide Design Guidelines are performance and guidance standards formulated to achieve excellence in new design, and do not take precedence over zoning regulations and development standards included in the LAMC. As stated in the Citywide Design Guidelines, although each of the Citywide Design Guidelines should be considered in a project, not all of them will be appropriate for every project, as each project will require a unique approach and flexibility to achieve excellence in design.

Other City of Los Angeles Environmental Policies, Ordinances, and Plans

The City of Los Angeles has adopted several other environmental plans, policies, and ordinances, such as the Los Angeles Green Building Code, Los Angeles Fire Department Strategic Plan, Los Angeles Public Library Strategic Plan 2015-2020, Public Recreation Plan, 2010 Bicycle Plan, Los Angeles Department of Water and Power 2015 Urban Water Management Plan, Sustainable City Plan, Green LA-Climate Action Plan, and the Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) Plan. Applicable plans, policies and ordinances are discussed in the respective environmental topic sections within this Draft EIR.

Northeast Los Angeles Community Plan

The Northeast Los Angeles Community Plan is one of 35 community plans established for different areas of the City to implement the policies of the Framework Element. The Project Site is located within the boundaries of the Northeast Los Angeles Community Plan, which was adopted more than 30 years ago to encompass the hills and valleys lying east of the Los Angeles River and north of the Boyle Heights Community Plan area within the City of Los Angeles. The Plan area comprises some 15,000 acres (City of Los Angeles, 2016b, p. 1-1).

Provided in **Table 4.8-1** below are lists of residential-related issues and opportunities from the Northeast Los Angeles Community Plan document (City of Los Angeles, 2016b, pp. I-9 through I-11):

Table 4.8-1
NORTHEAST LOS ANGELES COMMUNITY PLAN- RESIDENTIAL-RELATED ISSUES AND OPPORTUNITIES[51,52]

Issues	Opportunities
• Encroachment of incompatible uses and inappropriately-scaled development into single-family and low-density neighborhoods. • Impacts on residential neighborhoods from adjacent commercial and industrial activity, including, building signs and billboards, traffic, parking, and noise. • Development exceeding infrastructure and service capabilities, particularly in hillside areas. • Displacement and threat of displacement of residents because of acquisition of land for new development. • Overcrowded apartment units. • Imbalance in quality of housing stock. • Recent construction that is out of scale and of poor quality in design, construction, and maintenance. • Inadequacy of senior housing. • Lack of open space buffering or landscaping in and near apartment projects. • Rising cost of housing. • Illegal and unsafe housing units through conversion of commercial spaces, residences, and garages and new construction without building permits. • Deterioration of housing stock, including historic residences and architecturally significant structures through neglect or inappropriate remodeling.	• Undertaking planning and zoning actions to minimize encroachments of commercial, industrial, and multiple-residential uses into single-family residential areas. • Undertaking planning and zoning actions to minimize incompatibilities between residential uses and commercial or industrial use. • Identification of areas suitable for multiple-family development based on adequacy of infrastructure; services, schools and employment, as well as neighborhood character. • Development and implementation of regulations and incentives to promote identification and preservation of historically or architecturally significant structures. • Identification, preservation, and rehabilitation of historic residences. • Capitalizing on access and proximity to employment as an inducement for residential development. • Protecting public safety, health, and welfare by improving enforcement of building and zoning codes. • Strategically targeting sites for appropriate low-density hillside development. • Exploring potential for compatible residential and mixed-use development along commercial corridors. • Clustering projects on undeveloped or underdeveloped land. • Potential for appropriately-scaled new housing in proximity to new transit facilities.

51 Source: City of Los Angeles, 2016b. Northeast Los Angeles Community Plan. Accessed online at https://planning.lacity.org/complan/pdf/nlacptxt.pdf on March 27, 2018.
52 The City of Los Angeles acknowledges that the community plans are out of date and has committed to updating all of them.

4.8.2.2 Existing Conditions

Project Site

The Project Site is located at 4446 Florizel Street, on a 5.24-acre site, currently developed with the Rose Hill Courts public housing complex. Rose Hill Courts was constructed in 1942 by HACLA as a low-income public housing project.

The existing Rose Hill Courts public housing complex is comprised of 15 structures. Fourteen structures consist of 100-multi-family units, and one structure is an administration building with offices and a common room with a kitchen, pantry, and two bathrooms. Buildings throughout the Project Site are rectangular in shape and are generally arranged in parallel groupings. These groupings include:

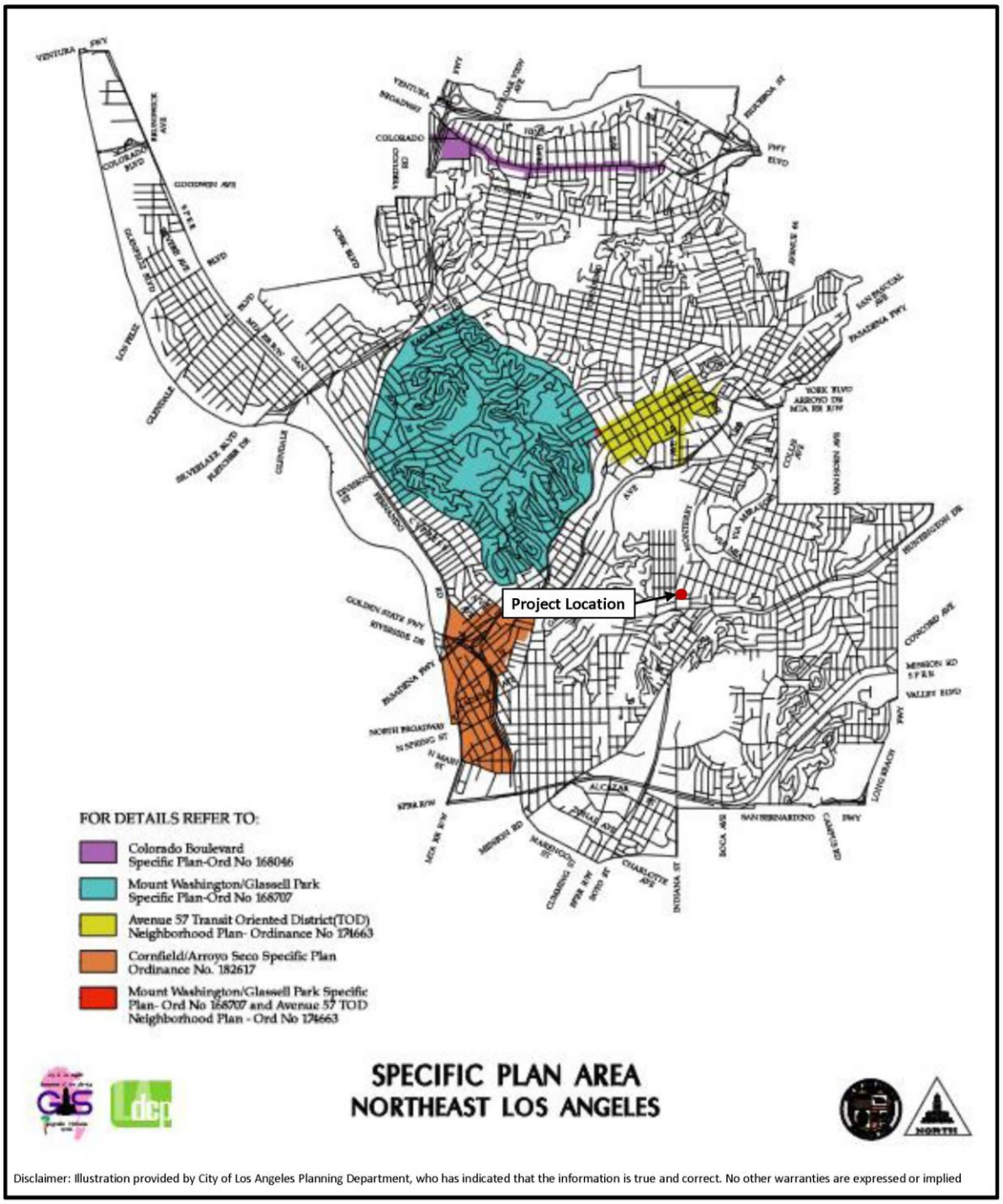
- the Northern Block comprising the administration building facing Florizel Street;
- the Western Block comprising three rectangular apartment buildings;
- the Eastern Block comprising one rectangular-shaped and four square-shaped apartment buildings located along the eastern portion of the site; and
- the Southern Block comprising six rectangular apartment buildings.

Generally, there are five different building types located onsite, all of which are either one or two stories in height, and consist of wood-frame construction, concrete slab foundations, and composition roofing. Parking for the complex consists of paved surface parking areas located along both sides of Victorine (i.e., private drive) that bisects the northern and southern blocks of the Rose Hill Courts complex.

Land Use and Zoning

Figure 4.8-1 shows that the Project Site does not fall within any of the specific plans located within the Northeast Los Angeles Community Plan area. The Project Site is located in the El Sereno portion of the Community Plan. El Sereno is located in the southeast part of the Plan area adjacent to the cities of South Pasadena, Alhambra, and Monterey Park and City Terrace, an unincorporated community in Los Angeles County. Although El Sereno was annexed to the City of Los Angeles in 1915, a number of neighborhoods have a strong sense of individual identity. These include Hillside Village, University Heights, and Emory Park, which extends into Alhambra, and the historic Short Line Villa area, which is on the NRHP (City of Los Angeles, 2016b, p. 1-4). **Figure 4.8-2** shows the Project Site is designated as Single Family Residential by the Northeast Community Plan. **Figure 4.8-3** shows the Project Site has a land use designation of Low Single Family Residential on the City's General Plan. The site is zoned for residential uses with a zoning designation of [Q]R1-1D (One Family Dwelling, Height District 1D) (see **Figure 4.8-4**). Therefore, the Rose Hill Courts development is an existing non-conforming use because the existing development has multi-family housing units which were constructed before the site was downzoned to R1 in 2000.

Figure 4.8-1
NORTHEAST LOS ANGELES SPECIFIC PLAN AREA



Source: City of Los Angeles, 2014

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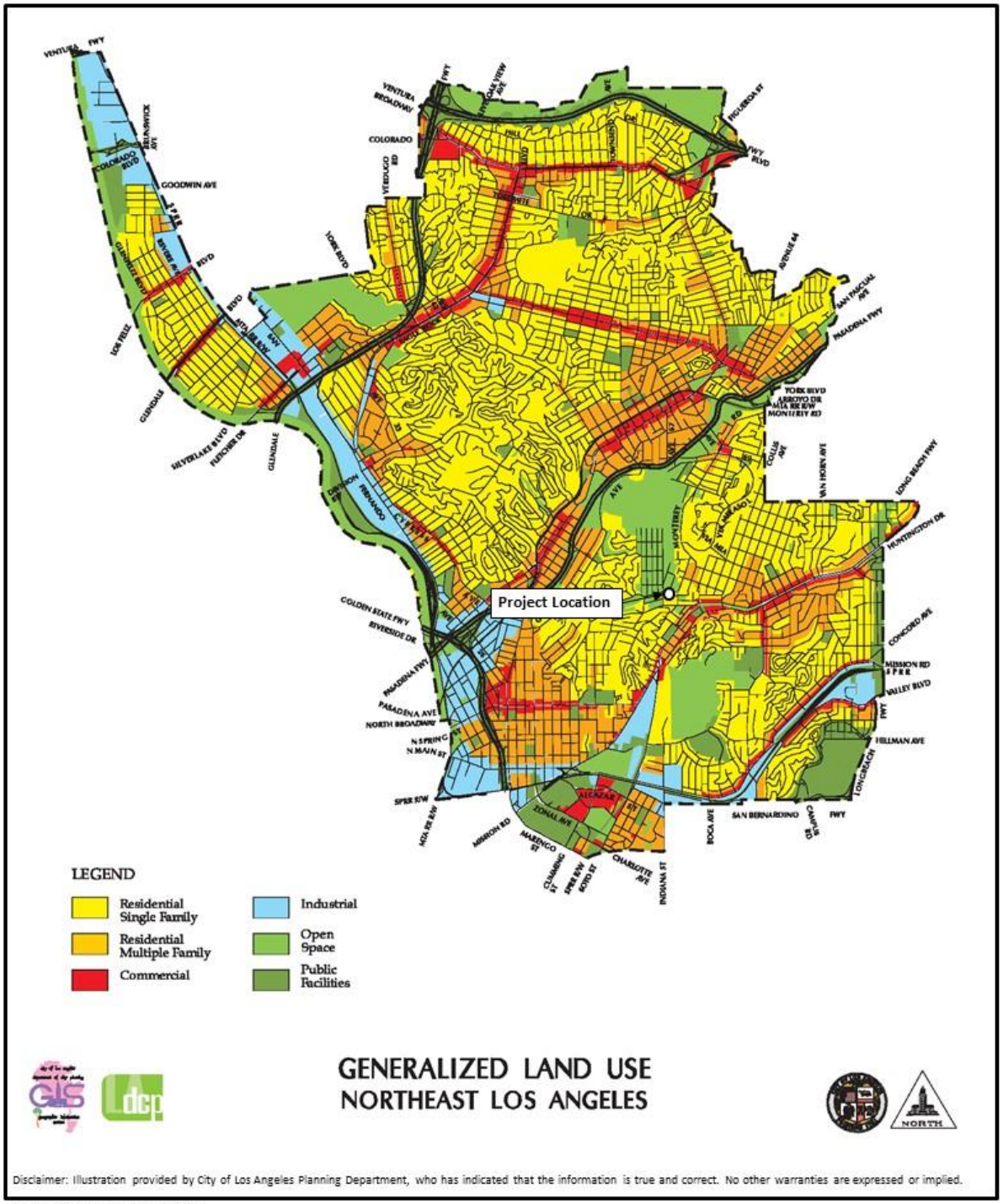
Northeast Los Angeles Specific Plan Area

Figure 4.8-2
GENERALIZED LAND USES IN THE NORTHEAST LOS ANGELES COMMUNITY PLAN AREA



Source: City of Los Angeles, 2014

UltraSystems

Rose Hill Courts Redevelopment

Northeast Los Angeles Community Plan
Generalized Land Use

Figure 4.8-3
EXISTING GENERAL PLAN LAND USE DESIGNATION FOR THE CITY OF LOS ANGELES

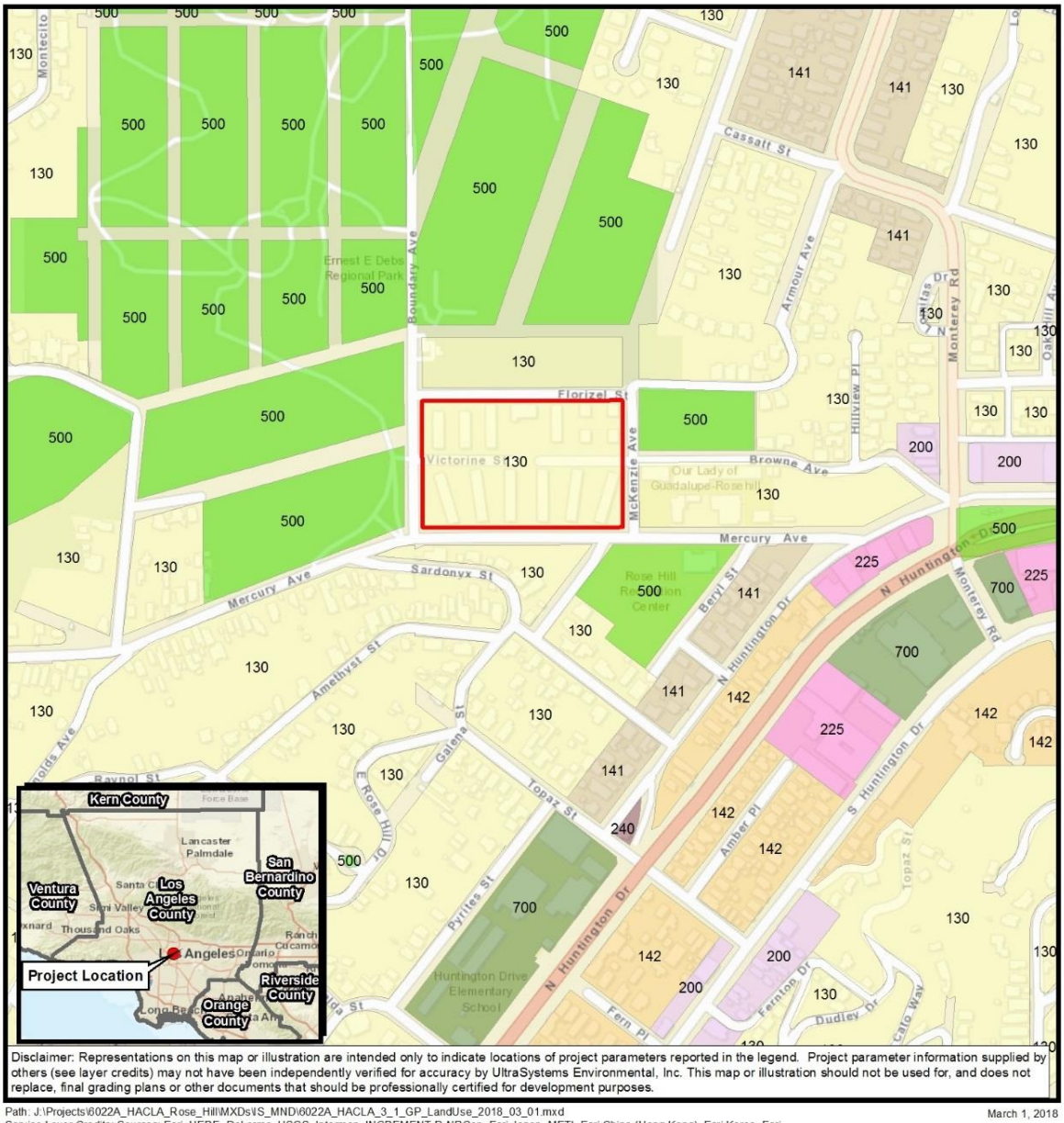
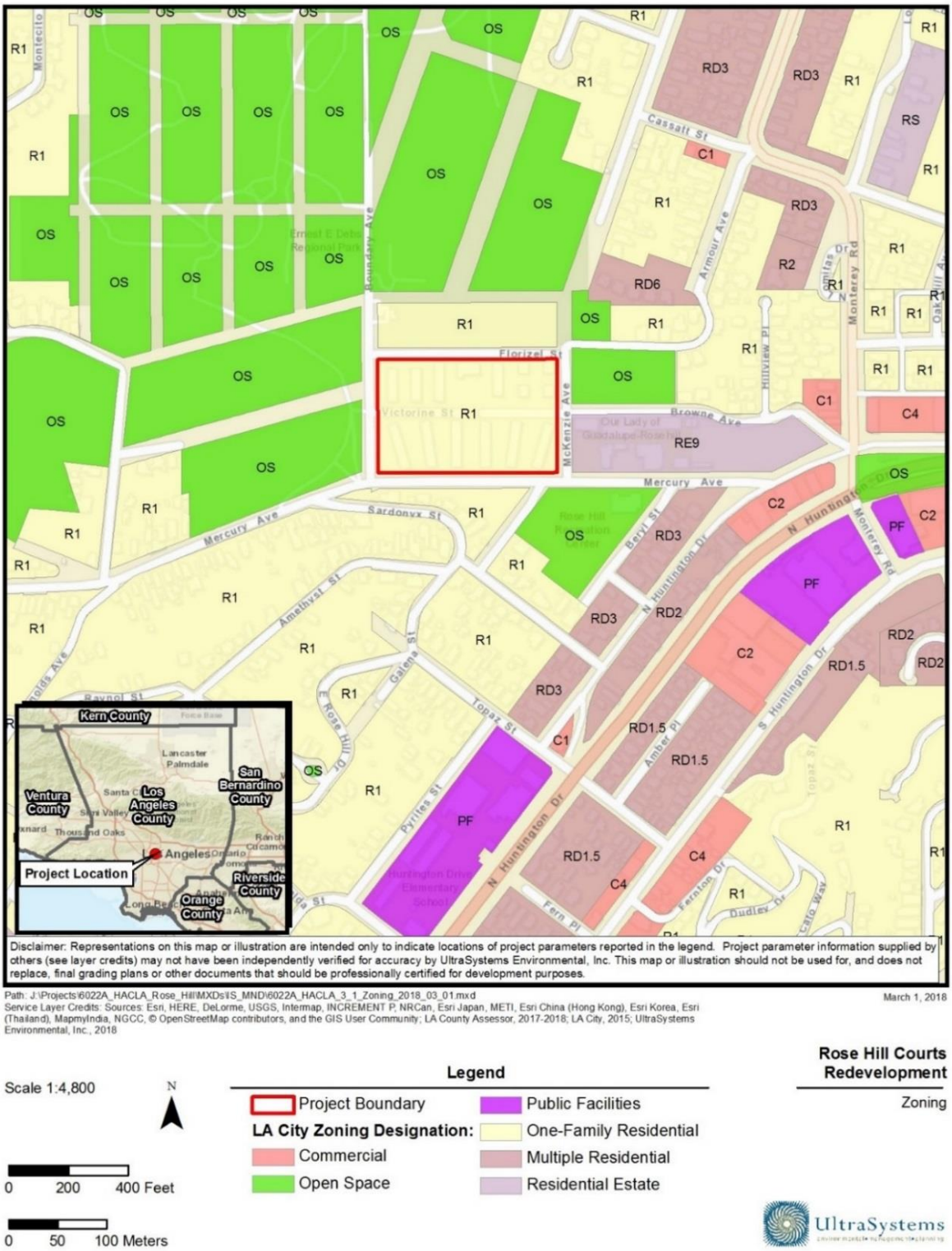


Figure 4.8-4
EXISTING ZONING DESIGNATION FOR THE CITY OF LOS ANGELES



The Qualified zone classification "Q" reflects the Northeast Los Angeles Hillside Ordinance because the Project Site is located within an area of the City designated as Northeast Los Angeles Hillside. Unique development standards applied to the site under this zoning classification address building height, floor area ratio, percent of lot coverage, and building setbacks. Refer to **Figures 4.8-3** and **4.8-4**, which show the existing General Plan Land Use and Zoning Designations of the Project Site.

Surrounding Land Uses

From a localized perspective, Rose Hill Courts is located within the community of El Sereno. This area is characterized by its numerous steep hills and vistas, which are located west of Monterey Road. This area includes natural open space landscapes, park lands, and equestrian trails. Located directly west of the Project Site, Ernest E. Debs Regional Park is the fourth largest park in the City and hosts the Audubon Center.

Land uses surrounding the Project Site include the Ernest E. Debs Regional Park to the west, along Mercury Avenue and Boundary Avenue; Rose Hill Park to the north; the Rose Hill Recreation Center to the southeast. Our Lady of Guadalupe Catholic Church and Elementary School is located east of the Project Site along Browne Avenue. Single-family and multi-family residential developments are located to the south and east of the Project Site.

4.8.3 Project Impacts

4.8.3.1 Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G, the project would have a significant impact related to land use if it would:

Threshold (a): ***Physically divide an established community; or***

Threshold (b): ***Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.***

For this analysis, the Appendix G Thresholds listed above are relied upon.

4.8.3.2 Methodology

State CEQA Guidelines § 15125(d) requires that a draft EIR discuss any inconsistencies with applicable plans. The analysis of land use impacts is based on a study of applicable planning and zoning documents and determining whether the Project would be consistent with the goals, objectives and policies included in plans adopted for the purpose of avoiding or mitigating an environmental effect. For the purpose of analysis in this draft EIR, the applicable state, regional and local regulations and plans that regulate land use or guide land use decisions pertaining to the Project Site are discussed in **Section 4.8.2.1** above. An analysis of project consistency with applicable land use policies identified in the land use planning documents is provided in **Section 4.8.5** below. A project is considered consistent with the provisions and general policies of an applicable City or regional land use plan if it is consistent with the overall intent of the plan and would not preclude the attainment of its primary goals. A project does not need to be in perfect conformity with each and every policy. According to the ruling in *Sequoyah Hills Homeowners Association v. City of Oakland*, state law does not require an exact match between a project and the applicable general plan. Rather,

to be "consistent", the project must be "compatible with the objectives, general land uses, and programs specified in the applicable plan," meaning that a project must be in "agreement or harmony" with the applicable land use plan to be consistent with that plan (City of Los Angeles, 2019, p. IV.G-18).

4.8.3.3 Analysis of Project Impacts

Relevant Project Characteristics

Proposed Land Use and Design

As discussed in **Section 2.0** of this draft EIR, the Project is a redevelopment project that would include the demolition of the Rose Hill Courts existing 15 structures and subsequent construction of 183 affordable housing units onsite. A total of 185 units is proposed; however, two of those units would be manager's units and therefore would not be affordable. The Project proposes 88 one-bedroom units; 59 two-bedroom units, 30 three-bedroom units, and eight four-bedroom units. The Project would have an estimated population of 656 residents, which is a net increase in population of 435 persons compared to existing conditions of 221 residents as of January 2019. The proposed density for the Project Site is 35.31 units per acre. The Project would also include a 6,366-square-foot community building and common indoor and outdoor spaces for use by the residents.

The Project would consist of two phases; the first phase will be comprised of two four-story multi-family buildings. Each building would have dedicated parking, shared leasing, and community/outdoor amenities. The architectural style would be California Contemporary with flat parapet roofs, stucco, and fiber cement siding material and color accents. Buildings in Phase I would be four-story and would be no more than 56 feet above the proposed grade. Two buildings in Phase II would be three stories tall with a maximum height of 46 feet. These buildings would include metal canopies, recessed dual-glazed, vinyl windows, horizontal siding, and exterior stucco. Buildings would have trellises, asphalt shingled roofs, horizontal siding, painted trim and exterior stucco.

Access, Circulation and Parking

The Project proposes access points into the complex from two driveways along Florizel Street, two driveways along Mercury Avenue, and one driveway along McKenzie Avenue. A total of 174 parking spaces will be provided onsite, with at-grade and tuck-under parking. Onsite parking for the Project equates to approximately 0.94 parking space per unit. The Project would meet the requirements of the Los Angeles Municipal Code using the applicable sections of 12.21 and 12.22.A25. Refer to **Section 4.12** of this draft EIR for details.

Open Space and Recreational Amenities

Several courtyards are proposed onsite, each with a unique design theme and use. Outdoor space adjacent to the community building would offer places for outdoor social gatherings, and special events and celebrations, with shaded areas seating and BBQ grills for outdoor dining. There would be play areas for children, from tot lots to hard surface play, experiential play elements that encourage interaction and group play. The landscape design would create a park-like setting for residents.

Signage and Lighting

The Project will include low-level exterior lighting that will be located on the buildings, and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated throughout the Project Site. All lighting would comply with current energy standards and codes as well as design requirements while providing appropriate light levels. Project lighting would be designed to provide efficient and effective onsite lighting while minimizing light trespass from the Project Site, reducing sky glow, and improving nighttime visibility through glare reduction. Where appropriate, interior lighting would be equipped with sensors or timers that would turn lights off when no one is present. All exterior and interior lighting would meet high energy efficiency requirements utilizing light-emitting diode (LED) or efficient fluorescent lighting technology. New street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would be approved by the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on both sidewalks and roadways while minimizing light and glare on adjacent properties.

Proposed signage would be designed to be aesthetically compatible with the proposed architecture of the Project Site and with the requirements of the Los Angeles Municipal Code. Proposed signage would include identity signage, either blade or monument, near the Management Office/Community Building, building and tenant signage, and general ground level and wayfinding pedestrian signage. No off-premises or billboard advertising is proposed as part of the Project. The Project would not include signage with flashing, mechanical, or strobe lights. Project signage would be illuminated via low-level low-glare external lighting, internal halo lighting, or ambient light. Exterior lighting for Project signage would comply with light intensities set forth in the LAMC and as measured at the property line of the nearest residentially zoned property.

Sustainability

The Project has been designed based on principles of smart growth and environmental sustainability by increasing the residential density onsite, creating an emphasis on walkability and access to public open space, with proximity to nearby retail, educational and transit amenities. In addition to being located near existing infrastructure needed to serve the proposed uses, the new buildings would be designed and constructed to incorporate environmentally-sustainable design features under Build It Green's "GreenPoint Rated" system. "Green" principles would be incorporated throughout the Project to comply with the City of Los Angeles Green Building Code (Ordinance No. 184,692). Such features would include energy-efficient buildings and water conservation and waste reduction measures, among others. The new buildings would include water and energy efficient fixtures and appliances such as high-efficiency toilets and shower heads, high-efficiency Energy Star appliances, and energy efficient LED lighting as appropriate. The Project would also utilize sustainable planning and building strategies and would incorporate the use of environmentally-friendly materials, such as non-toxic paints and recycled finish materials wherever possible.

Section 2.0 of this Draft EIR provides further information regarding sustainability features. **Section 4.15** of this Draft EIR provides further information regarding energy-consuming equipment and processes that would be used during construction and operation of the Project, energy requirements of the Project, energy conservation equipment and design features of the Project, energy supplies that would serve the Project, and total estimated daily vehicle trips that would be generated by the Project.

Discretionary Actions

Project implementation would require several discretionary entitlements and related approvals that pertain to project consistency with applicable land use policies and guidelines. As described in **Section 2.0**, these include, but are not limited to, the following:

- Approval of Disposition and Development Agreement
- Public Benefit Project with Alternative Compliance (PUB) under Los Angeles Municipal Code § 14.00B,
- Affordable Housing Density Bonus (SB 1818) as identified in LAMC § 12.22 A.25: Request is to allow a Density Bonus project with off-menu incentives, and
- Lot Tie/Lot Line Adjustment Process due to Phase I and II being on separate lots.

Threshold (a): Would the Project physically divide an established community?

The Project is the redevelopment of the existing Rose Hill Courts multi-family public housing complex that was originally built in 1942. The 5.24-acre Project Site is located within the Northeast Los Angeles Community Plan area, in the El Sereno Community of the City. Only the existing Rose Hill Courts Site would be redeveloped, as discussed in **Section 2.0** of this DEIR and the Initial Study prepared for the Project, included as **Appendix B** of this Draft EIR. The Project would provide new and additional affordable housing uses that would be compatible with and would complement existing and future development within the Project area. The Project would represent the existing surrounding urban environment.

Based on extensive outreach to the residents on the site and the community, the Project has been designed to provide high quality, multi-family housing, at a scale that is contextual and appropriate for the Site and the community. The architectural plan is based on creating a development with multiple building and unit types with shared amenities. While the Project would increase the density, scale, and height of development on the Project Site, these changes would not be out of character with the surrounding area, which is an urbanized neighborhood characterized by similar land uses. Refer to **Section 4.1** for more details regarding the visual character of the Project Site and surrounding area. The Project Site is specifically located in an area that is characterized by single- and multi-family uses, including the existing Rose Hill Courts. The proposed two- to four-story buildings would be compatible with existing low-rise buildings in the vicinity of the Project Site, including the homes located on the surrounding hillside at a higher elevation. Therefore, the Project's proposed residential use would be consistent with the scale of the existing uses within, and surrounding, the Project Site.

The Project would not divide an existing established community or public use spaces within a community in the vicinity of the Project Site, nor would it extend beyond the Project Site's existing boundaries. Furthermore, no streets or sidewalks would be permanently closed as a result of the redevelopment. The Project would utilize existing public roadways; thus, there would be no change in public roadway patterns. No separation of uses or disruption of access between land use types would occur as a result of the Project.

The Project would improve and enhance the existing streetscape surrounding the Project Site to promote pedestrian activity and continued access to public transportation and adjacent parks.

Consistent with surrounding areas, the Project would include ample open space and recreational amenities to promote continued community outdoor use. The Project would include 125,022 square feet of open space and landscaped areas with walkways. This includes a total landscaped area of 63,653 square feet plus 61,369 square feet of total open space. These spaces would include outdoor communal space with shaded seating and grills, and children's play areas with tot lots, paved surfaces, and several courtyards. Specifically, the Project would create a total of 44,012 square feet of common outdoor space and 9,350 square feet of private open space, in addition to 8,007 square feet of common indoor space. The Project would include a 6,366-square-foot Community Building and a "Central Park" green space, creating a park-like setting for residents. The central green space would include several activity areas, places for social gatherings, children and teen play areas, and several other amenities. Additionally, new pedestrian access points would be created throughout the Project Site via pedestrian walkways connecting to the interior central green space between the individual buildings. The pedestrian walkways would provide access to Rose Hill Park to the north, to Ernest E. Debs Regional Park to the west, and to the Rose Hill Recreation Center to the south. All buildings would either connect directly to perimeter streets or provide walkways connecting to perimeter streets.

Based on the analysis above, the Project would not substantially or adversely change the existing land use relationships between the Project Site and existing offsite uses, or have a long-term effect of adversely altering a neighborhood or community through ongoing disruption, division, or isolation. Therefore, the Project would not physically divide an established community, would have no impact with respect to Threshold (a) and no mitigation is required.

Threshold (b): ***Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?***

Project Consistency Analysis with Applicable Plans and Policies

The Project Site has a current zoning designation for single-family residential development. Therefore, the existing Rose Hill Courts development is a legal non-conforming land use because the existing development with multi-family housing units predates the R1 zoning. The Project proposes multi-family development that requires a Public Benefit approval under Los Angeles Municipal Code § 14.00.B. Additionally, the applicant is requesting an Affordable Housing Density Bonus (SB 1818), as identified in LAMC § 12.22 A.25, with off-menu incentives. Providing a Public Benefit approval as well as a Density Bonus would allow for the Project to be constructed without a General Plan Amendment or zone change from the City of Los Angeles.

The analysis of potential land use impacts considers consistency of the project with adopted plans, regulations, and development guidelines, and in some instances, advisory guidance, that regulate land use on the Project Site. The State CEQA Guidelines § 15125(d) requires that an EIR discuss any project inconsistencies with land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. For purposes of this analysis, the project is considered consistent with regulatory land use plans if it meets the general intent of the plans and/or would not preclude the attainment of their primary goals and objectives. The criterion for determining a significant land use plan impact is based on the potential for the project to substantively conflict with, or actively obstruct the implementation of applicable land use plans and related objectives, goals and policies. The tables below list applicable land use policies and regulations and the project's consistency with each.

City of Los Angeles General Plan

Table 4.8-2 below compares the Project's design characteristics to the applicable objectives, goals and policies identified in the City's General Plan: Framework Element, Health and Wellness Element (i.e., Plan for a Healthy Los Angeles), Air Quality Element, Conservation Element, Housing Element, Noise Element, Open Space Element, Service Systems Element/Public Recreation Plan Element, Safety Element and Mobility Element (i.e., Mobility Plan 2035). As shown in the table below, the Project would be consistent with all but one of the General Plan policies and therefore, impacts would be less than significant.

Table 4.8-2
PROJECT CONSISTENCY WITH APPLICABLE CITY OF LOS ANGELES GENERAL PLAN POLICIES[53]

Objective/Goal/Policy	Project Consistency
FRAMEWORK ELEMENT: *LAND USE CHAPTER*	
Policy 3.2.4: Provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhance the character of commercial and industrial districts. (P1, P2, P18).	**Consistent.** The Project Site is currently used for multi-family residential. There are other multi-family residential uses nearby including: several three-story apartment buildings on Florizel St. 270 feet northwest, Monterey Terrace Apartments 0.32 mile northwest, Huntington Hacienda II Apartments 0.33 mile southwest, Valley Vista Apartments 0.52 mile south, and Happy Valley Apartments 0.54 mile southeast. The Project would redevelop the Rose Hill Courts Project Site with 183 affordable housing units and in doing so would maintain the prevailing scale and character of housing in the Project vicinity and the current use of the site. Thus, the Project is consistent with this policy.
FRAMEWORK ELEMENT: *LAND USE CHAPTER*	
Policy 3.6.1: Ensure that the new development of "duplex" or multi-family units maintains the visual and physical character of adjacent single-family neighborhoods, including the maintenance of front property setbacks, modulation of building volumes and articulation of facade to convey the sense of individual units, and use of building materials that characterize single-family housing.	**Consistent.** The Project has been designed to complement the existing residential and other development in the vicinity of the Project Site. The Project consists of a variety of building volumes with lower scaled, two story buildings along Mercury and taller (3 and 4 story buildings) facing open space along Boundary and Florizel. The buildings along Mercury have individual unit entries with entry overhangs, front porches and a "cottage" vernacular architecture that speaks to a single-family expression. Refer to **Section 4.1** for additional details regarding aesthetics of the Project. Thus, the Project is consistent with this policy.

53 City of Los Angeles Department of City Planning, 2018a. General Plan. Accessed online at http://planning.lacity.org/ on March 26, 2018.

Objective/Goal/Policy	Project Consistency
FRAMEWORK ELEMENT: *HOUSING CHAPTER*	
Policy 4.1.1: Provide sufficient land use and density to accommodate an adequate supply of housing units by type and cost within each City subregion to meet the twenty-year projections of housing needs.	**Consistent.** The Project includes redevelopment of an existing affordable housing complex and in doing so would increase density and provide additional affordable housing units to address the need for an adequate supply of housing in the City. Rose Hill Courts currently contains 100 affordable multi-family dwelling units. The Project would develop the Project Site with 185 units including 183 affordable units and 2 unrestricted manager's units. The Project would facilitate new construction and would maintain affordable multi-family housing at the Project Site by increasing the number of affordable units onsite by 83, compared to existing conditions. Thus, the Project would be consistent with this policy.
Policy 4.1.8: Create incentives and reduce regulatory barriers in appropriate locations in order to promote the adaptive re-use of structures for housing and rehabilitation of existing units.	**Inconsistent.** The Project includes demolition of existing buildings and redevelopment of an existing affordable housing complex. The Project does not include adaptive re-use of structures for housing and rehabilitation of existing units. Thus, the Project would be inconsistent with this policy.
FRAMEWORK ELEMENT: *URBAN FORM AND NEIGHBORHOOD DESIGN CHAPTER*	
Objective 5.5: Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.	**Consistent.** The Project is a redevelopment project that would enhance livability of the neighborhood and improve the quality of the public realm by replacing the aging multi-family housing at Rose Hill Courts with 185 new housing units. The existing buildings are at the end of the useful life. The Project would upgrade development with new contemporary design, construction, accessibility and amenities. In addition, whereas the existing site has buildings which are internally oriented, such that the ends of the buildings face the street, the new site plan creates a more urban street frontage in which buildings face the street. Units and their entries are oriented towards the street, which, in addition to new landscaping, site lighting and security cameras will create a more pedestrian friendly site perimeter, enhancing access to the adjacent Parks for the broader community (who pass by Rose Hill Courts on their way to Rose Hill Park and Ernest Debs Regional Park). The Project proposes to use a variety of buildings materials such as composite panels, fiber cement siding, glass, and stucco, and would provide a varied roofline and elevations of buildings onsite. The Project proposes to provide landscaping along the perimeter of the Project Site, beyond which buildings and parking areas would be located. The varied site elevation and use of various building materials and landscaping contribute to the compatibility between

Objective/Goal/Policy	Project Consistency
	buildings, street, and the neighborhood. Thus, the Project would be consistent with this policy.
Policy 5.8.3: Modify parking standards and trip generation factors based on proximity to transit and provision of mixed-use and affordable housing.	**Consistent.** The Project Site is well services by exiting Metro Bus Transit Service and sidewalks along adjoining streets that are adequate for pedestrian access to and from transit stops. The Project is a redevelopment and infill project that would provide increased affordable housing on a site serviced by existing infrastructure for public transit and pedestrian circulation, thereby providing opportunities for increased trip generation. Thus, the Project would be consistent with this policy.
Policy 5.9.1: Facilitate observation and natural surveillance through improved development standards which provide for common areas, adequate lighting, clear definition of outdoor spaces, attractive fencing, use of landscaping as a natural barrier, secure storage areas, good visual connections between residential, commercial, or public environments and grouping activity functions such as child care or recreation areas.	**Consistent.** The Project would include the provision of well landscaped open spaces. Several courtyards are proposed onsite, each with a unique design theme and use. Proposed outdoor spaces would offer places for outdoor social gatherings, and special events and celebrations, with shaded areas for seating, play areas for children. The landscape design would create a park-like setting for residents. The Project has been designed to complement the existing surrounding land uses and site plan design to facilitate adequate sight lines. The Project proposes to provide landscaping along the perimeter of the Project Site, beyond which buildings and parking areas would be located. Exterior lighting would be provided throughout the proposed housing complex (in compliance with the requirements of the LAMC) to ensure nighttime safety. The Site would include security features such as cameras, controlled access to mid-rise buildings and parking areas. Secured building entry points and pedestrian security gates would be located throughout the Project Site. Rules would be clearly posted and onsite maintenance staff will keep the property clean. Thus, the Project would be consistent with this policy.
FRAMEWORK ELEMENT: ***OPEN SPACE AND CONSERVATION CHAPTER***	
Policy 6.1.6: Consider preservation of private land open space to the maximum extent feasible. In areas where open space values determine the character of the community, development should occur with special consideration of these characteristics.	**Consistent.** The Project would include the provision of well landscaped open spaces within the Site. Several courtyards are proposed onsite, each with a unique design theme and use. Proposed outdoor spaces would offer places for outdoor social gatherings, and special events and celebrations, with shaded areas for seating, play areas for children. The landscape design would create a park-like setting for residents. Thus, the Project would be consistent with these policies regarding provision of private open space. The existing site currently has 159,189 square feet of open space and the Project proposes 125, 022 square feet of open space. The Project would reduce the amount of open
Policy 6.4.8: Maximize the use of existing public open space resources at the neighborhood scale and seek new opportunities for private development to enhance the open space resources of the neighborhoods.	

Objective/Goal/Policy	Project Consistency
	space by 34,167 square feet or approximately 21 percent. Besides onsite open space, there are several existing public parks surrounding the Site, including: Rose Hill Recreation Center, Rose Hill Park, and Ernest E. Debs Regional Park in addition to several others in the vicinity.
FRAMEWORK ELEMENT: *ECONOMIC DEVELOPMENT CHAPTER*	
Policy 7.9.1: Promote the provision of affordable housing through means which require minimal subsidy levels and which, therefore, are less detrimental to the City's fiscal structure.	**Consistent.** The Project includes redevelopment of an existing 100-unit public housing site. The Project would increase the number of units by 85, for a total of 185 units. The Project takes advantage of an existing publicly owned site to provide more affordable housing for the City of Los Angeles and will utilize funds from State and Federal sources as much as possible to leverage funding from HACLA.
HEALTH AND WELLNESS ELEMENT	
Guiding Principle #22: Healthy housing: The City will identify opportunities to incentivize quality, healthy and affordable housing for Angelenos at all income levels. The City will ensure that tenants and property owners have access to information on healthy standards of living.	**Consistent.** The Project is a redevelopment project that would promote healthy standards of living by replacing the aging multi-family affordable housing at Rose Hill Courts with 185 new housing units. The existing buildings contain lead-based paint and asbestos containing materials which will be removed and abated prior to demolition. The existing residents at the Project Site were involved throughout the planning process to educate them regarding the need for upgraded housing units and to solicit input on the problems currently faced by existing residents and design of suitable project features to improve the existing standards of living. The Project would include the provision of well landscaped open spaces and sidewalks for pedestrian circulation. Proposed outdoor spaces would offer places for outdoor social gatherings, with shaded areas for seating and play areas for children. The landscape design would create a park-like setting for residents. Accessibility would also be improved. Exterior lighting would be provided throughout the proposed housing complex (in compliance with the requirements of the LAMC) to ensure nighttime safety. Thus, the Project would be consistent with these policies and principles regarding health and wellness.
Policy 2.2: Promote a healthy built environment by encouraging the design and rehabilitation of buildings and sites for healthy living and working conditions, including promoting enhanced pedestrian-oriented circulation, lighting, attractive and open stairs, healthy building materials and universal accessibility using existing tools, practices, and programs.	
AIR QUALITY ELEMENT	
AQ 4.2.3: Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	**Consistent.** The Project has been designed to allow flow of pedestrians, bicycles, and vehicles into and out of the Project Site. The Project would not conflict with

Objective/Goal/Policy	Project Consistency
	the nearby bus stops. Thus, the Project is consistent with this policy.
CONSERVATION ELEMENT	
Section 3, Archaeological and Paleontological, Policy 1: Continue to identify and protect significant archaeological and paleontological sites and/or resources known to exist or that are identified during land development, demolition or property modification activities.	**Consistent.** Pursuant to the requirements of Section 106 of the NHPA, HCID prepared a Programmatic Agreement with the two Project sponsors, HACLA and the Related Companies of California, as Concurring Parties, to implement six stipulations to take into account the effect of the Project on potential historic properties, and outlining actions to be taken to protect significant archaeological, historic and cultural resources, if discovered during Project construction. Thus, the Project is consistent with this policy.
Section 6, Endangered Species, Policy 1: Continue to require evaluation, avoidance, and minimization of potential significant impacts, as well as mitigation of unavoidable significant impacts on sensitive animal and plant species and their habitats and habitat corridors relative to land development activities.	**Consistent.** As detailed in **Section 4.3** of this document, mitigation is proposed to reduce potential impacts on species to a less than significant level. Thus, the Project is consistent with this policy.
HOUSING ELEMENT	
Policy 1.1.2: Expand affordable rental housing for all income groups that need assistance.	**Consistent.** The Project would increase the number of units on site from 100 to 185, with a net increase of 83 affordable units and 2 market rate manager's units.
HOUSING ELEMENT	
Policy 1.1.3: Facilitate new construction and preservation of a range of different housing types that address the particular needs of the city's households.	**Consistent.** The Project would increase the number of units on site from 100 to 185, with a net increase of 83 affordable units and 2 market rate manager's units. In addition, the Project will include a range of unit sizes (from 1 bedroom to 4 bedrooms) and a range of unit configurations (flats, elevator buildings walk up buildings) to provide a range of housing types for various family configurations. Thus, the Project would be consistent with this policy.
Policy 1.2.2: Encourage and incentivize the preservation of affordable housing, including non-subsidized affordable units, to ensure that demolitions and conversions do not result in the net loss of the City's stock of decent, safe, healthy or affordable housing.	**Consistent.** See response to Housing Policy 1.1.3 directly above. The Project would be consistent with this policy.
Policy 1.2.3: Rehabilitate and/or replace substandard housing with housing that is decent, safe, healthy and affordable and of appropriate size to meet the City's current and future household needs.	**Consistent.** The Project would replace the aging multi-family housing at Rose Hill Courts with 185 new housing units. Thus, the Project would be consistent with this policy.

Objective/Goal/Policy	Project Consistency
Policy 2.4.2: Develop and implement design standards that promote quality residential development.	**Consistent.** The Project has been designed to provide new multi-family affordable housing that will have contemporary amenities one would expect in any new development. Units will have washers and dryers in-unit, or in common laundry areas and kitchens will be sized to allow standard appliances including ranges, dishwashers and refrigerators. The new community building will have space for on site management and leasing, space for social services, meetings rooms, a gym and a large community room. The open space areas will provide a multitude of opportunities for relaxation and play, with varied plazas, courtyards, planted areas, seating areas and play structures that will accommodate the needs of residents of all ages.
Policy 2.4.3: Develop and implement sustainable design standards in public and private open space and street rights-of-way. Increase access to open space, parks and green spaces.	**Consistent.** The Project would include the provision of well landscaped open spaces and sidewalks for pedestrian circulation. Proposed outdoor spaces would offer places for outdoor social gatherings, with shaded areas for seating and play areas for children. The landscape design would create a park-like setting for residents. Thus, the Project would be consistent with this policy.
OPEN SPACE ELEMENT	
General Policy for privately owned open space lands: Private development should be encouraged to provide ample landscaped spaces, malls, fountains, rooftop green areas and other aesthetic features which emphasize open space values through incentive zoning practices or other practicable means.	**Consistent.** The Project would include the provision of well landscaped open spaces. Several courtyards are proposed onsite, each with a unique design theme and use. Proposed outdoor spaces would offer places for outdoor social gatherings, and special events and celebrations, with shaded areas for seating, play areas for children. The landscape design would create a park-like setting for residents. Thus, the Project would be consistent with this policy.
SAFETY ELEMENT	
Policy 2.1.6: Standards/fire. Continue to maintain, enforce and upgrade requirements, procedures and standards to facilitate more effective fire suppression.	**Consistent.** As discussed in **Section 4.11a**, Public Services-Fire Protection, compliance with the Los Angeles Building Code and LAFD standards is mandatory and routinely conditioned upon projects when they are approved. The LAFD will review development plans to ascertain the nature and extent of any additional requirements. The Project would be constructed with automatic sprinklers, where required by code. The Project, once operational, will be periodically inspected by the Fire Department. Therefore, the Project would be consistent with this policy.

Objective/Goal/Policy	Project Consistency
MOBILITY PLAN 2035	
Policy 2.3: Pedestrian Infrastructure: Recognize walking as a component of every trip, and ensure high-quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.	**Consistent.** The Project Site is located in an area with existing pedestrian infrastructure including sidewalks along adjoining streets that are adequate for pedestrian access to and from nearby transit stops. Sidewalks will be repaired/replaced as required by the City of Los Angeles. Existing street trees would be protected during construction. The Project includes entry and exit points for pedestrians from the adjoining public sidewalks. The Project would also provide sidewalks, open spaces and landscaped areas within the site for ease of pedestrian circulation. Thus, the Project would be consistent with this policy.

City of Los Angeles Walkability Checklist

Table 4.8-3 below compares the Project's design characteristics to the objectives and goals of the City's Walkability Checklist. As shown in the table below, the Project would be consistent with the Walkability Checklist requirements and therefore, impacts would be less than significant.

Table 4.8-3
PROJECT CONSISTENCY WITH WALKABILITY CHECKLIST OBJECTIVES AND GOALS[54]

Walkability Checklist Applicable Objectives/Goals	Project Consistency
SIDEWALKS	
Objective: Support ease of pedestrian movement and enrich the quality of the public realm by providing appropriate connections and street furnishings in the public right of way.	**Consistent.** The current street grid in the Project vicinity accommodates pedestrian activity. The Project would not adversely affect the existing street grid. The Project Site has been designed for safety and traffic flow. Thus, the Project is consistent with this policy.
Goal 2: Provide for pedestrian safety and comfort.	**Consistent.** The Project would not significantly impact pedestrian safety because it is infill development. The Project involves the addition of curb cuts to accommodate proposed driveways on the Project Site, however, these modifications will not significantly impact pedestrian safety. Thus, the Project is consistent with this policy.
Goal 6: Comply with governmental regulations for all improvements in the public right of way.	**Consistent.** The Project is anticipated to require utility improvements in the public right of way. However, all improvements would be made in accordance with applicable laws, regulations, and requirements. Thus, the Project is consistent with this policy.

54 Source: City of Los Angeles Department of City Planning, 2008. Walkability Checklist. Accessed online at: http://urbandesignla.com/resources/LAWalkabilityChecklist.php. Accessed May 7, 2018

Walkability Checklist Applicable Objectives/Goals	Project Consistency
CROSSWALKS/STREET CROSSINGS	
Objective: Pedestrian safety is the primary concern in designing and managing street crossings. Crossings that are safe, easy to use and well-marked support active, pedestrian-friendly environments and link both sides of the street physically and visually.	**Consistent.** The current street grid in the Project vicinity accommodates pedestrian activity. The Project would not adversely affect the existing street grid. The Project Site has been designed for safety and traffic flow. Thus, the Project is consistent with this policy.
Goal 2: Provide for pedestrian safety and comfort.	**Consistent.** Refer to Goal 2 above, under Sidewalks. Thus, the Project is consistent with this policy.
UTILITIES	
Goal 1: Locate utilities in areas that preserve the character of the street and neighborhood.	**Consistent.** Utility upgrades associated with the Project would be undergrounded, where feasible, and would potentially involve modifications to existing above ground electrical lines. Thus, the Project is consistent with this policy.
Goal 2: Minimize the impact of utilities on the visual environment.	**Consistent.** Refer to the answer directly above for Utilities, Goal 1 regarding underground utilities.
Goal 3: Minimize the impact of utilities on the pedestrian path of travel.	**Consistent.** Refer to the answer above for Utilities, Goal 1 regarding underground utilities.
Goal 4: Ensure the location of utilities in the public right of way complies with governmental and utility regulations.	**Consistent.** The Project is anticipated to require utility improvements in the public right of way. However, all improvements would be made in accordance with applicable laws, regulations, and requirements. Thus, the Project is consistent with this policy.
BUILDING ORIENTATION	
Goal 3: Support ease of accessibility to buildings.	**Consistent.** The Project includes open spaces and pedestrian paths on site to support ease of accessibly to buildings on the Project Site. There are multiple parking lots on site, located in close proximity to individual building entries, minimizing travel distance as much as possible. Accessible parking will be provided as required by the Los Angeles Building Code. Thus, the Project is consistent with this policy.
OFF-STREET PARKING AND DRIVEWAYS	
Goal 1: Ensure that clear and convenient access for pedestrian is not minimized by vehicular needs.	**Consistent.** The Project has been designed with adequate sight lines and site plan design to facilitate pedestrian movement around the Project Site. Further, parking is located in closer proximity to the buildings than under existing conditions and parking is arranged in multiple smaller lots without the ability to "drive through" the site, minimizing conflicts between cars and pedestrians. Pedestrian access to buildings is through pedestrian walkways,

Walkability Checklist Applicable Objectives/Goals	Project Consistency
	separated from parking lots as much as possible. Thus, the Project is consistent with this policy.
Goal 3: Increase awareness between pedestrians and motorists.	**Consistent.** As discussed above, the Project has been designed with adequate sight lines and site plan design to facilitate pedestrian movement around the Project Site. Parking would also be located in closer proximity to the buildings than under existing conditions. New lighting for security purposes will also promote awareness. Thus, the Project is consistent with this policy.
ONSITE LANDSCAPING	
Goal 1: Add visual interest.	**Consistent.** The landscape design theme would complement the architectural style and would be California Eclectic with a selection of drought tolerant and low maintenance plant materials. Plant selections are based on their aesthetic/horticultural value, durability, water use, and low maintenance. Trees such as London Plane trees, Fern Pine, Palo Verde, Olive, Mesquite, African Sumac, Marina Strawberry Tree, and Crape Myrtle, Jacaranda, and gold Medallion trees have been selected for visual accent. The trees selected provide strong visual image, low water use, and have fire retardant characteristics[55]. Thus, the Project is consistent with this policy.
Goal 4: Create a neighborhood identity and contribute to "placemaking."	**Consistent.** The landscape design theme would complement the architectural style and would be California Eclectic with a selection of drought tolerant and low maintenance plant materials. Thus, the Project is consistent with this policy.
BUILDING FACADE	
Goal 1: Incorporate features on the building façade that add visual interest to the environment.	**Consistent.** The Project proposes to use a variety of buildings materials such as composite panels, fiber cement siding, glass, and stucco, and would provide a varied roofline and elevations of buildings onsite. Thus, the Project is consistent with this policy.

55 Withee Malcolm Architects Preliminary Landscape Plan, dated December 20, 2018

Walkability Checklist Applicable Objectives/Goals	Project Consistency
BUILDING FACADE	
Goal 2: Create compatibility between buildings, street and neighborhood through architectural elements that add scale and character.	**Consistent.** The Project provides a transition in scale from 4 story buildings facing Rose Hill Park stepping down to 2 story buildings along Mercury. There are three story buildings facing Boundary and facing the internal green space of the site. Thus, the massing both steps down towards the single-family neighbors towards the south and provides a variation in building height and roofline expression to avoid monotony and bulk. The materiality also transitions from a more contemporary expression for the buildings along Florizel and Boundary to a more traditional single family "cottage" vernacular for the buildings facing Mercury. Finally, the community building facing McKenzie will be an attractive "entry" element for the site as a whole, providing identity for the Project and an orientation point for the neighborhood. Thus, the Project is consistent with this policy.
BUILDING SIGNAGE AND LIGHTING	
Goal 2: Complement the character of nearby buildings and the street.	**Consistent.** The Project has been designed to complement the existing surrounding land uses and has been designed for multi-family use, which is compatible with the current existing use and several other multi-family structures in the vicinity. The Project would preserve and enhance the positive characteristics of existing uses and improve the identity and appearance of the neighborhood and community as a whole. Thus, the Project is consistent with this policy.

Northeast Los Angeles Community Plan

Table 4.8-4 below compares the Project's design characteristics to the policies, objectives and goals of the Northeast Los Angeles Community Plan. As shown in the tables below, the Project would be consistent with the Northeast Los Angeles Community Plan policies and therefore, impacts would be less than significant.

Table 4.8-4
PROJECT CONSISTENCY WITH APPLICABLE NORTHEAST LOS ANGELES COMMUNITY PLAN POLICIES[56]

Policy	Project Consistency
URBAN DESIGN	
Policy 1-3.1: Protect the quality and scale of the residential environment through attention to the appearance of new construction including site planning and compatible building design.	**Consistent.** The Project has been designed to be compatible with the existing development in the Project vicinity. Specifically, the site is broken down in scale and massing to from 4 stories at the portion of the site facing open space, to two stories on the portion of the site facing the residential neighborhood to the south. The units are dispersed in building blocks that are oriented towards the street, and have individual unit entries along the street, creating an attractive street façade that will be complemented by drought tolerant landscaping and accented with porches, canopies, trellises and other architectural elements. Parking is de-emphasized visually, with parking areas tucked behind buildings, or, where visible, accented with landscaped borders and islands. Thus, the Project is consistent with this policy.
Policy 1-3.2: Consider factors such as neighborhood character and aesthetics; identity; compatibility of land uses; and impacts on livability, services, public facilities, and traffic levels when changes in residential densities are proposed.	**Consistent.** Factors, such as neighborhood character and aesthetics, identity; compatibility of land uses have been taken into account during Project design. The Project includes development of multi-family affordable housing on the Project Site, which is what currently exists on the Project Site. Thus, the Project is consistent with this policy.
Policy 1-4.1: Encourage identification and documentation of historic and architectural resources in the Plan area.	**Consistent.** Pursuant to the requirements of Section 106 of the NHPA, HCID prepared a Programmatic Agreement with the two Project Sponsors, HALCA and the Related Companies of California, as Concurring Parties, to implement six stipulations to take into account the effect of the Project on potential historic properties, outlining actions to be taken if historical or cultural deposits are discovered during Project construction. Under this agreement, the historic Rose Hill Courts buildings would be photographed and properly documented in accordance with all applicable laws and regulations before Project implementation (refer to **Section 4.4** for details). Thus, the Project is consistent with this policy.

56 Source: City of Los Angeles, 2016.

Policy	Project Consistency
LAND USE	
Policy 1-5.1: Limit development according to the adequacy of the existing and assured street circulation system within the Plan Area and surrounding areas.	**Consistent.** The Project would provide adequate parking and circulation. Refer to **Section 4.12** of this document for details. The existing street circulation system is adequate to accommodate the additional residents. Thus, the Project is consistent with this policy.
Policy 1-5.4: Require that any proposed development be designed to enhance and be compatible with adjacent development.	**Consistent.** The Project would redevelop the Rose Hill Courts Project Site with 185 housing units and in doing so would be compatible by maintaining the prevailing scale and character of housing in the Project vicinity. The El Sereno area contains an eclectic mix of architectural styles ranging from Spanish to Craftsman to modern. New single-family homes in the area are also a mix of contemporary and historic-referencing styles. The Project has been designed in a contemporary style which incorporates some more traditional architectural elements in the lower scale buildings. This mix of expression is consistent with the existing surrounding neighborhood; thus, the Project is consistent with this policy.
POPULATION AND HOUSING	
Policy 1-6.3: Ensure that redevelopment activity minimizes displacement of residents.	**Consistent.** The Project is consistent with this policy because a relocation plan will be created to ensure residents are housed during construction. Tenants also have the right to return to the Project Site when it is completed.

SCAG Regional Comprehensive Plan

Table 4.8-5 below compares the Project's consistency with the goals and principles set forth in the SCAG Regional Comprehensive Plan. As shown in the tables below, the Project would be consistent with the goals and principles contained in the RCP, therefore, impacts would be less than significant.

Table 4.8-5
PROJECT CONSISTENCY WITH SCAG REGIONAL COMPREHENSIVE PLAN GOALS AND PRINCIPLES[57]

Applicable Goals and Policies	Project Consistency
LAND USE AND HOUSING	
Goal: Successfully integrate land and transportation planning and achieve land use and housing sustainability by implementing Compass Blueprint and 2% Strategy:	**Consistent.** The Project includes redevelopment of an existing affordable housing complex and in doing so would increase density and provide a net additional 83 affordable housing units to address the need for an adequate supply of housing in the City. As discussed in

57 SCAG (Southern California Council of Governments), 2008 Regional Comprehensive Plan. Accessed online at http://www.scag.ca.gov/NewsAndMedia/Pages/RegionalComprehensivePlan.aspx on May 8, 2018.

Applicable Goals and Policies	Project Consistency
• Focusing growth in existing and emerging centers and along major transportation corridors. • Providing new housing opportunities, with building types and locations that respond to the region's changing demographics. • Targeting growth in housing, employment and commercial development within walking distance of existing and planned transit stations. • Injecting new life into under-used areas by creating vibrant new business districts, redeveloping old buildings and building new businesses and housing on vacant lots. • Protecting important open space, environmentally sensitive areas and agricultural lands from development.	**Section 4.8.2.1** above, High-Quality Transit Areas include generally walkable transit villages or corridors that are within 0.5 mile of a well-services transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. Local jurisdictions are encouraged to focus housing and employment growth with High-Quality Transit Areas. The Project Site is located in the vicinity of High-Quality Transit Areas identified in Exhibit 5.1 in the 2016-2040 RTP/SCS. The Project Site is well serviced by exiting Metro Bus Transit Service and sidewalks along adjoining streets that are adequate for pedestrian access to and from the several public transit stops adjacent to the site. The Project would also include well landscaped and adequate open spaces and pedestrian areas. The Project is an infill project that would provide increased affordable housing on a site serviced by existing infrastructure for public transit and pedestrian circulation, thereby providing opportunities for increased trip generation. Thus, the Project would be consistent with this policy.
Policy LU-6.2: Developers and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program.	**Consistent.** "Green" principles would be incorporated throughout the Project to comply with the City of Los Angeles Green Building Code. Sustainable project features would include energy-efficient buildings, a pedestrian-friendly site design, LED lighting, natural ventilation, Water-efficient irrigation, drought-tolerant plants and indigenous species, installation of catch basins and low impact development features, and environmentally friendly materials such as non-toxic paint, wherever possible. Thus, the Project would be consistent with this policy.
Policy OSC-8: Local governments should encourage patterns of urban development and land use, which reduce costs on infrastructure and make better use of existing facilities.	**Consistent.** The Project is a redevelopment and infill project that would provide increased affordable housing on a developed site serviced by existing infrastructure for utilities, public services, and transit. Thus, the Project would be consistent with this policy.
Policy OSC-10: Developers and local governments should promote infill development and redevelopment to revitalize existing communities.	**Consistent.** The Project is a redevelopment and infill project that would enhance livability of the neighborhood and improve the quality of the public realm by replacing the aging multi-family housing at Rose Hill Courts with 185 new housing units. Factors, such as neighborhood character and aesthetics, identity; compatibility of land uses have been taken into account during Project design. Thus, the Project would be consistent with this policy.
Policy OSC-11: Developers should incorporate and local governments should include land use principles, such as green building, that use resources efficiently, eliminate pollution and	**Consistent.** "Green" principles would be incorporated throughout the Project to comply with the City of Los Angeles Green Building Code. Sustainable Project features would include energy-efficient buildings, a

Applicable Goals and Policies	Project Consistency
significantly reduce waste into their projects, zoning codes and other implementation mechanisms.	pedestrian-friendly site design, LED lighting, natural ventilation, Water-efficient irrigation, drought-tolerant plants and indigenous species, installation of catch basins and low impact development features, and environmentally friendly materials such as non-toxic paint, wherever possible. Thus, the Project would be consistent with this policy.
Policy OSC-12: Developers and local governments should promote water-efficient land use and development.	**Consistent.** "Green" principles would be incorporated throughout the Project to comply with the City of Los Angeles Green Building Code. The Project would include installation of water-efficient irrigation, drought-tolerant plants and indigenous species. Thus, the Project would be consistent with this policy.
WATER	
PolicyWA-11: Developers and local governments should encourage urban development and land uses to make greater use of existing and upgraded facilities prior to incurring new infrastructure costs.	**Consistent.** The Project is a redevelopment and infill project that would provide increased affordable housing on a developed site serviced by existing infrastructure for utilities which are adequate to serve the Project. Thus, the Project would be consistent with this policy.
Policy WA-12: Developers and local governments should reduce exterior uses of water in public areas, and should promote reduced use in private homes and businesses, by shifting to drought-tolerant native landscape plants (xeriscaping), using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives.	**Consistent.** "Green" principles would be incorporated throughout the Project to comply with the City of Los Angeles Green Building Code. The Project would include installation of water-efficient irrigation, drought-tolerant plants and indigenous species. Thus, the Project would be consistent with this policy.
Policy WA-23: Local governments should encourage Low Impact Development[58] and natural spaces that reduce, treat, infiltrate and manage runoff flows caused by storms and impervious surfaces.	**Consistent.** "Green" principles would be incorporated throughout the Project to comply with the City of Los Angeles Green Building Code. The Project includes Low Impact Development/Standard Urban Mitigation Plan BMPs for "store & re use" to retain and treat site runoff during storm events. Sustainable Project features would include installation of catch basins and low impact development features. Thus, the Project would be consistent with this policy.
Policy WA- 27: Developers and local governments should maximize pervious surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. New impervious surfaces should be minimized to the greatest extent possible, including the use of in-lieu fees and off-site mitigation.	**Consistent.** "Green" principles would be incorporated throughout the Project to comply with the City of Los Angeles Green Building Code. Sustainable Project features would include installation of catch basins and low impact development features. The Project would provide ample pervious landscaped areas and will collect stormwater in retention tanks on site, for pre-

58 See Low Impact Development (LID) information online at: https://www.lastormwater.org/green-la/low-impact-development/faqs/which-developments-are-required-to-follow-the-lid-ordinance/

Applicable Goals and Policies	Project Consistency
	treatment and re-use as irrigation. Thus, the Project would be consistent with this policy.
ENERGY	
Policy EN-10: Developers and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program.	**Consistent.** "Green" principles would be incorporated throughout the Project to comply with the City of Los Angeles Green Building Code. Sustainable Project features would include energy-efficient buildings, a pedestrian-friendly site design, LED lighting, natural ventilation, Water-efficient irrigation, drought-tolerant plants and indigenous species, installation of catch basins and low impact development features, and environmentally friendly materials such as non-toxic paint, wherever possible. Thus, the Project would be consistent with this policy.
AIR QUALITY	
Reverse current trends in greenhouse gas emissions to support sustainability goals for energy, water supply, agriculture, and other resource areas.	**Consistent.** "Green" principles would be incorporated throughout the Project to comply with the City of Los Angeles Green Building Code. The Project would incorporate sustainable features for water conservation, energy conservation and waste reduction that would help in reducing energy-related emissions. The Project would include drought-tolerant plants, high-efficiency toilets and shower heads, water-efficient irrigation, and energy-efficient appliances and LED lighting. The Project includes Low Impact Development/Standard Urban Mitigation Plan BMPs for "store & re use" to retain and treat site runoff during storm events. Thus, the Project would be consistent with this policy.
Expand green building practices to reduce energy-related emissions from developments to increase economic benefits to business and residents.	
SOLID WASTE	
Policy SW-14: Developers and local governments should integrate green building measures into project design and zoning including, but not limited to, those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program.	**Consistent.** "Green" principles would be incorporated throughout the Project to comply with the City of Los Angeles Green Building Code. Sustainable Project features would include measures for diversion and reuse of construction and demolition waste. Thus, the Project would be consistent with this policy.
TRANSPORTATION	
Goal: A more efficient transportation system that reduces and better manages vehicle activity.	**Consistent.** The Project would have convenient access to public transit and opportunities for walking, which would reduce vehicle activity. Thus, the Project would be consistent with this policy.

Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

Table 4.8-6 below compares the Project's consistency with the goals and principles set forth in the SCAG RTP/SCS. As shown in the tables below, the Project would be consistent with goals and principles contained in the RTP/SCS and therefore, impacts would be less than significant.

Table 4.8-6
PROJECT CONSISTENCY WITH SCAG RTP/SCS GOALS AND PRINCIPLES[59]

Applicable Goals and Policies	Project Consistency
Maximize mobility accessibility for all people and goods in the region.	**Consistent.** The Project includes redevelopment of an existing affordable housing complex and in doing so would increase density and provide a net additional 83 affordable housing units to address the need for an adequate supply of housing in the City. As discussed in **Section 4.8.2.1** above, High-Quality Transit Areas include generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. Local jurisdictions are encouraged to focus housing and employment growth with High-Quality Transit Areas. The Project Site is located in the vicinity of High-Quality Transit Areas identified in Exhibit 5.1 in the 2016-2040 RTP/SCS. The Project Site is well serviced by existing Metro Bus Transit Service and sidewalks along adjoining streets that are adequate for pedestrian access to and from transit stops. The Project would also include well-landscaped and adequate open spaces and pedestrian areas. The Project is an infill project that would provide increased affordable housing on a site serviced by existing infrastructure for public transit and pedestrian circulation, thereby providing opportunities for increased trip generation. Thus, the Project would be consistent with the applicable goals of the RTP/SCS.
Ensure travel safety and reliability for all people and goods in the region.	
Maximize the productivity of our transportation system.	
Encourage land use and growth patterns that facilitate transit and active transportation.	

Based on policy consistency analysis provided in the tables above, the Project would be substantially consistent with applicable state, regional and local plans, goals, objectives and policies that govern development in the Project area. Therefore, impacts related to land use consistency would be less than significant.

4.8.4 Cumulative Impacts

As discussed in **Section 3.0** of this Draft EIR, there are seven related projects that were considered in the cumulative analysis for the Project. The related projects generally consist of infill development including apartments, single-family homes, mixed use, retail, office and school uses (KOA, 2019, Attachment F). Similar to the Project, the cumulative projects would be required to comply with

59 SCAG, 2016. The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy. Accessed online at http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf on April 19, 2019.

relevant land use policies and regulations and would be subject to CEQA review. As discussed above in **Section 4.8.3**, the Project would be consistent with goals, objectives and policies contained in existing planning documents that regulate land use and development in the Project area. The Project would not incrementally contribute to cumulative inconsistencies with respect to land use plans and development standards. Implementation of the Project along with the cumulative projects considered for the purpose of this analysis would not have cumulatively significant land use impacts. **Therefore, cumulative impacts related to land use and planning would be less than significant and would not be cumulatively considerable.**

4.8.5 Mitigation Measures

As discussed above, the Project would be consistent with applicable state, regional and local plans, goals, objectives and policies that govern development in the Project area. Project-level and cumulative impacts with regard to land use would be less than significant. Therefore, no mitigation measures would be necessary.

4.8.6 Level of Significance After Mitigation

Project-level and cumulative impacts related to land use would be less than significant without mitigation.

4.9 Noise

4.9.1 Introduction

This section of the Draft EIR analyzes the potential impacts from noise and vibration that will result from Project construction and operation. It includes a discussion of the characteristics of sound and ground-borne vibration. Regulations, standards, and plans for controlling noise exposures are then described. The section identifies sensitive noise receivers onsite and surrounding the Project and presents the results of two ambient sampling events; one on the Project Site and one in the neighborhood. Short-term (construction) noise and vibration exposures estimates are quantified, and a qualitative discussion of operational impacts is presented. The section recommends mitigation measures for construction noise generated onsite. Finally, cumulative noise impacts are discussed. Ambient noise measurement data are included in **Appendix M1** and **Appendix M2** of this Draft EIR.

4.9.2 Environmental Setting

4.9.2.1 Noise and Vibration Fundamentals

Noise

<u>Characteristics of Sound</u>

Sound is a pressure wave transmitted through the air. It is described in terms of loudness or amplitude (measured in decibels), frequency or pitch (measured in hertz [Hz] or cycles per second), and duration (measured in seconds or minutes). The decibel (dB) scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound. The pitch of the sound is related to the frequency of the pressure vibration. Because the human ear is not equally sensitive to all frequencies, a special frequency-dependent rating scale is used to relate noise to human sensitivity. The A-weighted decibel scale (dBA) provides this compensation by discriminating against upper and lower frequencies in a manner approximating the sensitivity of the human ear. The scale is based on a reference pressure level of 20 micropascals (zero dBA). The scale ranges from zero (for the average least perceptible sound) to about 130 (for the average human pain level).

<u>Noise Measurement Scales</u>

Several rating scales have been developed to analyze adverse effects of community noise on people. Since environmental noise fluctuates over time, these scales consider that the effect of noise on people depends largely upon the total acoustical energy content of the noise, as well as the time of day when the noise occurs. Those that are applicable to this analysis are as follows:

- L_{eq}, the equivalent noise level, is an average of sound level over a defined time period (such as one minute, 15 minutes, one hour, or 24 hours). Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure.
- L_{90} is a noise level that is exceeded 90 percent of the time at a given location; it is often used as a measure of "background" noise.

- L_{max} is the root mean square (RMS) maximum noise level during the measurement interval. This measurement is calculated by taking the RMS of all peak noise levels within the sampling interval. L_{max} is distinct from the peak noise level, which only includes the single highest measurement within a measurement interval.
- CNEL, the Community Noise Equivalent Level, is a 24-hour average L_{eq} with a 4.77-A-weighted decibel (dBA) "penalty" added to noise during the hours of 7:00 p.m. to 10:00 p.m., and a 10-dBA penalty added to noise during the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the evening and nighttime (ICF Jones & Stokes, 2009). The logarithmic effect of these additions is that a 60-dBA 24-hour L_{eq} would result in a calculation of 66.7 dBA CNEL.
- L_{dn}, the day-night average noise, is a 24-hour average L_{eq} with an additional 10-dBA "penalty" added to noise that occurs between 10:00 p.m. and 7:00 a.m. The L_{dn} metric yields values within 1 dBA of the CNEL metric. As a matter of practice, L_{dn} and CNEL values are considered to be equivalent and are treated as such in this assessment.

Ground-Borne Vibration

Vibration is sound radiated through the ground. Ground-borne noise is the rumbling sound caused by the vibration of building interior surfaces. The ground motion caused by vibration is measured as peak particle velocity (PPV) in inches per second and is referenced as vibration decibels (VdB). Typical outdoor sources of perceptible ground-borne vibration are construction equipment and traffic on rough roads.

4.9.2.2 Regulatory Framework

Federal

The United States Environmental Protection Agency, under the Authority of the Noise Control Act of 1972, has established noise emission criteria, as detailed in Title 40 of the Code of Federal Regulations (CFR). Title 40 of the CFR, Parts 201 through 205 pertain to various transportation equipment (such as motor carries engaged in interstate commerce) and Part 204, which provides noise emission standards for construction equipment.

Because Rose Hill Courts is bordered on two sides by residences that could be affected by construction noise from the Project, the U.S. Department of Housing and Urban Development's goal of 45 dBA L_{dn} as a desirable maximum interior standard for residential units developed under HUD funding (HUD, 1985) is pertinent. While HUD does not specify acceptable exterior noise levels, standard construction of residential dwellings constructed under Title 24 of the California Code of Regulations typically provides 20 dBA of acoustical attenuation with the windows closed and 10 dBA with the windows open. Based on this assumption, the exterior L_{dn} or CNEL should not exceed 65 dBA under normal conditions.

State

The California Department of Health Services (DHS) Office of Noise Control has studied the correlation of noise levels with effects on various land uses. The Office of Noise Control no longer exists. The most current guidelines prepared by the state noise officer are contained in the "General Plan Guidelines" issued by the Governor's Office of Planning and Research in 2017 (OPR, 2017). These guidelines establish four categories for judging the severity of noise intrusion on specified land uses:

- **Normally Acceptable**: Is generally acceptable, with no mitigation necessary.
- **Conditionally Acceptable**: May require some mitigation, as established through a noise study.
- **Normally Unacceptable**: Requires substantial mitigation.
- **Clearly unacceptable**: Probably cannot be mitigated to a less-than-significant level.

The types of land uses addressed by the state standards, and the acceptable noise categories for each are presented in **Table 4.9-1**. There is some overlap between categories, which indicates that some judgment is required in determining the applicability of the numbers in some situations.

Table 4.9-1
LAND USE COMPATIBILITY FOR COMMUNITY NOISE SOURCES

Land Use Category	Noise Exposure (dBA, CNEL)						
	55	60	65	70	75	80	
Residential – Low-Density Single-Family, Duplex, Mobile Homes							
Residential – Multiple Family							
Transient Lodging – Motel, Hotels							
Schools, Libraries, Churches, Hospitals, Nursing Homes							
Auditoriums, Concert Halls, Amphitheaters							
Sports Arena, Outdoor Spectator Sports							

Land Use Category	Noise Exposure (dBA, CNEL)						
	55	60	65	70	75	80	
Playgrounds, Neighborhood Parks							
Golf Courses, Riding Stables, Water Recreation, Cemeteries							
Office Buildings, Business Commercial and Professional							
Industrial, Manufacturing, Utilities, Agriculture							

	Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.
	Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply system or air conditioning will normally suffice.
	Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.
	Clearly Unacceptable: New construction or development should generally not be undertaken.

Source: OPR, 2017.

Local

City of Los Angeles Regulations and Policies

Noise Element

The noise element of the City of Los Angeles General Plan (City of Los Angeles Department of City Planning, 1998) applies to the city as a whole. It addresses noise mitigation regulations, strategies and programs, and delineates federal, state and city jurisdiction relative to rail, automotive, aircraft and nuisance noise. Regulation of vehicular noise is largely outside the authority of municipal government. Primary municipal authority includes regulation of land use, implementing federal and

state regulations and enforcing nuisance noise. This element describes noise management programs of each jurisdictional entity, as they relate to the City of Los Angeles.

The Noise Element of the City of Los Angeles' General Plan uses a scheme similar to that of **Table 4.9-1** to classify the acceptability of different long-term noise levels for sensitive land uses (City of Los Angeles Department of City Planning, 1998, p. I-1). For the single-family houses immediately south and east of Rose Hill Courts, 24-hour averages below 55 dBA CNEL are normally acceptable, and levels between 55 and 70 dBA CNEL are conditionally acceptable. For multifamily housing, to the south and east of the Project Site, 24-hour averages below 60 dBA CNEL are normally acceptable, and levels between 60 and 70 dBA CNEL are conditionally acceptable.

City of Los Angeles Noise Regulations (Chapter IX)

The City of Los Angeles Municipal Code (LAMC) has short-term noise exposure standards for various types of sources, but none appear to be relevant to this analysis. Section 41.40(a) of the Municipal Code restricts construction operations to 7:00 a.m. to 9:00 p.m., Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturdays and national holidays. Construction is prohibited on Sundays. Variances for construction during normally prohibited hours may be obtained from the Executive Officer of the Los Angeles Board of Police Commissioners.[60]

Section 112.05(a) of the City of Los Angeles Municipal Code limits noise exposures from construction equipment to 75 dBA at a distance of 50 feet in any residential zone of the City or within 500 feet thereof. Almost all common types of construction equipment exceed that limit. The Municipal Code allows exceedance of the limit upon demonstration that compliance is technically infeasible.[61]

Community Plan

The Community Plan (City of Los Angeles, 2016b) does not include noise and vibration policies, goals, standards or other provisions specific to the Project area.

Ground-Borne Vibration

The City of Los Angeles does not have standard, guidelines or thresholds for vibration exposure. The American National Standards Institute (ANSI, 1983) indicates that vibration levels in critical care areas, such as hospital surgical rooms and laboratories, should not exceed 0.2 inch per second of PPV. The Federal Transit Administration (FTA) also uses a PPV of 0.2 inch per second as a vibration damage threshold for fragile buildings and a PPV of 0.12 inch per second for extremely fragile historic buildings (FTA, 2006). The FTA criteria for "infrequent" ground-borne vibration events (fewer than 30 events per day) that may cause annoyance are 80 VdB for residences and buildings where people normally sleep, and 83 VdB for institutional land uses with primarily daytime use; for "frequent" events (more than 70 per day from the same source), the annoyance levels are 72 and 75 VdB for the two aforementioned receiver categories, respectively (FTA, 2018, p. 126).

60 City of Los Angeles Municipal Code § 41.40(b).

61 In accordance with the City's noise regulations, "technically feasible" means that the established noise limitations can be complied with at a project site, with the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques employed during the operation of equipment.

4.9.2.3 Existing Conditions

Noise Sources

The predominant source of noise in the area of Rose Hill Courts is motor vehicle traffic. The Arroyo Seco Parkway (State Route [SR]-110) is 4,570 feet northwest of the Project Site. The nearest major thoroughfare is Huntington Drive North, which is classified as a collector, is southeast of the Project Site and has an average daily traffic (ADT) of about 32,000 to 40,000 vehicles per day at its intersection with Topaz Street.[62] Other roadway segments near the Project Site and their historical ADT counts are:

- Mercury Avenue at Huntington Drive North: 3,300 to 4,600 ADT.
- Mercury Avenue at McKenzie Avenue: 3,950 ADT.
- Topaz Street at Huntington Drive North: 8,150 ADT.

Noise-Sensitive Receptors

The Noise Element of the City of Los Angeles General Plan deems the following land uses "noise-sensitive" (City of Los Angeles Department of City Planning, 1998, p. 3-1):

- Single-family and multi-unit dwellings.
- Long-term care facilities (including convalescent and retirement facilities).
- Dormitories, motels, hotels, transient lodgings and other residential uses.
- Houses of worship.
- Hospitals.
- Libraries.
- Schools.
- Auditoriums; concert halls; outdoor theaters.
- Nature and wildlife preserves.
- Parks.

The existing sensitive receptors that are nearest to the Project Site are listed in **Table 4.9-2**. These receivers would be exposed to noise during Project construction and operations.

62 Calculated from data compiled in 2001-10 Traffic Volume Book, Los Angeles Department of Transportation. ladot.lacity.org/sites/g/files/wph266/f/LACITYP_023705.xls.

Table 4.9-2
NEAREST EXISTING SENSITIVE RECEIVERS

Sensitive Land Use	Location with Respect to Project	Distance[a] from Proposed Improvements (feet)
Residential Neighborhoods	Southwest, south, southeast and northeast of Project	220
Rose Hill Park	North of Project, across Florizel Street	230
Residential Neighborhoods	Project Site	95[b]
Our Lady of Guadalupe Rose Hill (Church and School)	East of Project, across McKenzie Avenue	220

Source: Distances measured by *UltraSystems on Google Earth map, 2018.*
[a]Geometric mean distance.
[b]For the noise exposure calculations, the distances used were, for each subphase and sensitive receiver, the shortest distance between source and receiver. The value for residential receptors was 49 feet; the receptor was an offsite residence. **See Sections 4.9.3.2** and **4.9.3.3** for more information on calculation methods.

Ambient Noise Levels

On Wednesday, December 21, 2016 and Wednesday, May 23, 2018, UltraSystems conducted ambient noise sampling on the Project Site and in the general Project area. The purpose of this noise monitoring was to obtain data on background noise in the Project area, so that the change in noise exposure due to the Project could be evaluated. The focus of the 2016 sampling was the Project Site itself, while the focus of the 2018 sampling was the surrounding community.

A Quest SoundPro Model DL-1-1/3 ANSI Type 1 sound level meter was used in the "slow" mode at each measurement location to obtain a 15-minute average sound level (L_{eq}), as well as other metrics. The meter's microphone was maintained five feet above the ground. Noise meter output records and observations during sampling are in **Appendix M**.

December 21, 2016 Noise Sampling

Locations for the December 21, 2016 ambient noise sampling are listed and described in **Table 4.9-3** and shown in **Figure 4.9-1**. Results of the ambient noise monitoring are presented in **Table 4.9-3**.

Table 4.9-3
DECEMBER 21, 2016 MEASURED AMBIENT NOISE LEVELS

Point	Sampling Location	Time on December 21, 2016	Measurement Results (dBA)		
			15-Minute L_{eq}	L_{max}	L_{90}
RH-1	In the western portion of the Project Site, between buildings 1 and 2, on north side of Victorine	1108 – 1123	49.9	62.9	45.5
RH-2	In the western portion of the Project Site, between buildings 10 and 11, on south side of Victorine	1137 – 1152	51.7	66.7	45.4
RH-3	In the eastern portion of the Project Site, between buildings 4 and 7, on north side of Victorine	1158 – 1213	48.4	57.8	45.2
RH-4	South of the Project Site, on sidewalk on south side of Mercury Avenue; homes atop a 30-foot slope from the street	1219 – 1234	60.9	78.2	46.9
RH-5	East of the Project Site, at the corner of McKenzie Avenue and Browne Avenue, near church with school	1256 – 1311	55.7	77.7	47.0

Source: Measured by UltraSystems, 2016.

May 23, 2018 Noise Sampling

Locations for the May 23, 2018 ambient noise sampling are listed and described in **Table 4.9-4** and shown in **Figure 4.9-2**. Results of the ambient noise monitoring are presented in **Table 4.9-4.**

Average ambient noise levels in the neighborhood of the Rose Hill Courts Project Site ranged from 48.5 to 59.7 dBA L_{eq}. The highest average noise levels were at measurement point 1. Ambient noise levels at all the points are typical of a residential setting.

Average ambient noise levels within the Rose Hill Courts complex ranged from 48.4 to 51.7 dBA L_{eq}. This relatively quiet environment results in large part from buildings shielding the measurement points from traffic noise. Ambient noise levels along the surrounding streets ranged from 55.7 to 60.9 dBA L_{eq}. Traffic noise evidently influenced these levels.

Existing Ground-Borne Vibration Levels

As observed on a visit to the Project Site, the main source of existing ground-borne vibration in the vicinity of the proposed Project are vehicles traveling on local roadways, including but not limited to cars, trucks, and buses.

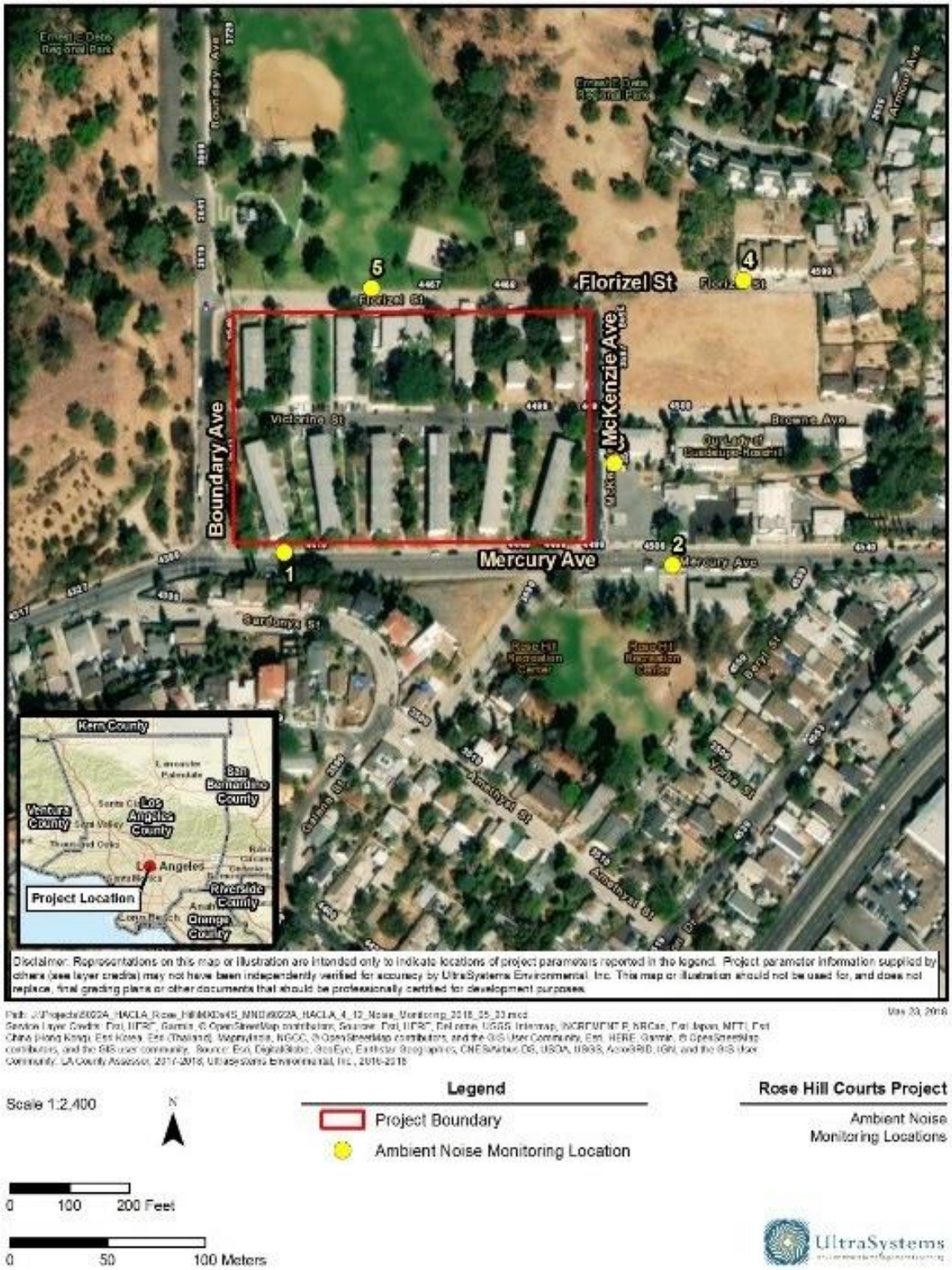
Table 4.9-4
MAY 23, 2018 MEASURED AMBIENT NOISE LEVELS

Point	Sampling Location	Time on May 23, 2018	Measurement Results (dBA)		
			15-Minute L_{eq}	L_{max}	L_{90}
1	In front of residence at 4411 Mercury Avenue, across street from Project	1020 – 1035	59.7	75.3	45.3
2	At 4530 Mercury Avenue, in front of Rose Hill Recreation Center, across street from Our Lady of Guadalupe-Rose Hill school	1113 – 1128	57.7	71.5	45.6
3	At 4504 Browne Avenue, near pastoral center, across McKenzie Avenue from Project	1135 – 1150	52.5	66.0	42.8
4	In front of residence at 4523 Florizel Street, northeast of Project	1158 – 1213	54.6	72.8	44.4
5	In Rose Hill Park, across Florizel Street from Project administrative building	1221 – 1236	48.5	62.8	41.5

Source: Measured by UltraSystems, 2018.

Figure 4.9-1
DECEMBER 21, 2016 AMBIENT NOISE SAMPLING LOCATIONS

Figure 4.9-2
MAY 23, 2018 AMBIENT NOISE SAMPLING LOCATIONS



4.9.3 Project Impacts

4.9.3.1 Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G, the project would have a significant impact related to noise if it would result in the:

Threshold (g): ***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; or***

Threshold (h): ***Generation of excessive groundborne vibration or groundborne noise levels; or;***

Threshold (i): ***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.***

For this analysis, the Appendix G Thresholds listed above are relied upon. The analysis also utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions.

The L.A. CEQA Thresholds Guide identifies the following criteria to evaluate impacts related to noise:

(1) Construction Noise

A project would normally have a significant impact on noise levels from construction if:

- Construction activities lasting more than one day would exceed existing ambient exterior sound levels by 10 dBA (hourly L_{eq}) or more at a noise-sensitive use;
- Construction activities lasting more than 10 days in a three-month period would exceed existing ambient exterior noise levels by 5 dBA (hourly L_{eq}) or more at a noise-sensitive use; or
- Construction activities of any duration would exceed the ambient noise level by 5 dBA (hourly L_{eq}) at a noise-sensitive use between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, before 8:00 a.m. or after 6:00 p.m. on Saturday, or at any time on Sunday.

Construction of the Project would take approximately 36 months and is anticipated to be completed in 2024. Therefore, since construction activities would occur over a period longer than 10 days for all phases, the corresponding significance criterion used in the construction noise analysis presented in this section is an increase in the ambient exterior noise levels by 5 dBA (hourly L_{eq}) or more at a noise-sensitive use.

(2) Operational Noise

A project would normally have a significant impact on noise levels from operation if:

- The project causes the ambient noise levels measured at the property line of affected noise-sensitive uses to increase by 3 dBA CNEL to or within the "normally unacceptable" or "clearly unacceptable" category (see **Section 4.9.2.2** for a description of these categories); or

- The project causes the ambient noise levels measured at the property line of affected noise-sensitive uses to increase by 5 dBA CNEL or greater; or

- Project-related operational onsite (i.e., non-roadway) noise sources, such as outdoor building mechanical/electrical equipment, outdoor activities, loading, trash compactor, or parking facilities, increase the ambient noise level (hourly L_{eq}) at noise-sensitive uses by 5 dBA.

The significance criteria used in the noise analysis for onsite operations presented below is an increase in the ambient noise level of 5 dBA (hourly L_{eq}) at the noise-sensitive uses, in accordance with the LAMC. The LAMC does not apply to offsite traffic (i.e., vehicles traveling on public roadways). Therefore, based on the L.A. CEQA Thresholds Guide, the significance criteria for offsite traffic noise associated with Project operations is an increase in the ambient noise level by 3 dBA or 5 dBA CNEL (depending on the ambient noise levels and the land use category) at noise-sensitive uses. In addition, the significance for composite noise levels (onsite and offsite sources) is also based on the L.A. CEQA Thresholds Guide, which is an increase in the ambient noise level of 3 dBA or 5 dBA CNEL (depending on the ambient noise levels and the land use category) for the project's composite noise (both project-related onsite and offsite sources) at noise-sensitive uses.

4.9.3.2 Methodology

Noise impacts from construction activities are a function of the noise generated by the operation of construction equipment and onroad delivery and worker commuter vehicles, the location of equipment, and the timing and duration of the noise-generating activities. For the purpose of this analysis, it was estimated that the Project would be built in two phases. Phase I would start in March 2021 and end in September 2022. Phase II would run from early December 2022 to early June 2024.

Using preliminary design and scheduling information, UltraSystems used the air pollutant emissions estimation model CalEEMod[63] to estimate the number of days to execute the following construction sub-phases within each of three major phases:

- Demolition.
- Site preparation.
- Grading.
- New building construction.
- Concrete paving.
- Architectural coating.

The types and numbers of pieces of equipment anticipated in each phase of construction and development were estimated using CalEEMod and UltraSystems' experience with similar projects. The CalEEMod equipment mix is based on a construction survey performed by the South Coast Air Quality Management District (SCAQMD) (Breeze Software, 2017). **Table 4.9-5** lists the equipment

63 Described in **Section 4.2**.

expected to be used. For each equipment type, the table shows an average noise emission level (in dBA at 50 feet, unless otherwise specified) and a "usage factor," which is an estimated percentage of operating time that the equipment would be producing noise at the stated level.[64] **Table 4.9-6** shows the assumed deployment of equipment in each construction phase and sub-phase.

Table 4.9-5
CONSTRUCTION EQUIPMENT NOISE CHARACTERISTICS

Equipment Type	Horsepower	Usage Factor	Maximum Sound Level (dBA @ 50 feet)
Air Compressor (portable)	78	0.48	81
Cement and Mortar Mixers	9	0.4	85
Concrete/Industrial Saws	81	0.2	90
Crane	231	0.29	83
Excavator	158	0.4	80
Forklift	89	0.2	67
Generator Set	84	0.5	73
Grader	187	0.41	85
Paver	130	0.5	77
Paving Equipment	132	0.5	85
Roller	80	0.2	80
Rubber-Tired Dozer	247	0.4	79
Tractor/Loader/Backhoe	97	0.37	85
Welder	46	0.45	74

Source: Breeze Software, 2017; Knauer, H. et al., 2006

64 Equipment noise emissions and usage factors are from Knauer, H. et al., 2006. FHWA Highway Construction Noise *Handbook.* U.S. Department of Transportation, Research and Innovative Technology, Administration, Cambridge, Massachusetts, FHWA-HEP-06-015 (August 2006), except where otherwise noted.

Table 4.9-6
ASSUMED DEPLOYMENT OF OFFROAD CONSTRUCTION EQUIPMENT

Subphase	Phase I		Phase II	
	Equipment Type	No. of Pieces	Equipment Type	No. of Pieces
Demolition	Concrete/Industrial Saws	1	Concrete/Industrial Saws	1
	Excavators	3	Excavators	3
	Rubber-Tired Dozers	1	Rubber-Tired Dozers	1
	Tractors/Loaders/Backhoes	3	Tractors/Loaders/Backhoes	3
Grading	Excavators	1	Excavators	1
	Graders	1	Graders	1
	Rubber-Tired Dozers	1	Rubber-Tired Dozers	1
	Tractors/Loaders/Backhoes	1	Tractors/Loaders/Backhoes	1
Building Construction	Cranes	1	Cranes	1
	Forklifts	1	Forklifts	1
	Generator Sets	1	Generator Sets	1
	Tractors/Loaders/Backhoes	1	Tractors/Loaders/Backhoes	1
	Welders	3	Welders	3
Paving	Cement and Mortar Mixers	1	Cement and Mortar Mixers	1
	Pavers	1	Pavers	1
	Paving Equipment	1	Paving Equipment	1
	Rollers	1	Rollers	1
	Tractors/Loaders/Backhoes	1	Tractors/Loaders/Backhoes	1
Architectural Coating	Air Compressors	1	Air Compressors	1

For the noise exposure calculations, the distances used were, for each subphase, the shortest distance between source and receiver. The calculation assumes spherical spreading, which is used for analysis of stationary sources (as opposed to traffic) and minimal ground absorption. The formula is (Hendriks et al., 2013):

$$dBA_2 = DBA_1 + 20 \log_{10} (D_1/D_2)$$

where

dBA_1 = Reference sound level (dBA)
dBA_2 = Sound level at receiver (dBA)
D_1 = Distance from reference source to receiver
D_2 = Distance from actual source to receiver

As seen in **Table 4.9-5**, the reference distance for all equipment types was 50 feet.

The construction vibration analysis used formulas published by the Federal Transit Administration (FTA, 2018, p. 185). For a standard reference distance of 25 feet, peak particle velocity is found from:

$$PPV = PPV_{ref} \times (25/D)^{1.5}$$

where

PPV_{ref} = Reference source vibration at 25 feet
D = Distance from source to receiver

The vibration level (VdB) for a standard reference distance of 25 feet is found from:

$$VdB = L_{vref} - 30 \log(D/25)$$

where

L_{vref} = Reference source vibration level at 25 feet
D = Distance from source to receiver

4.9.3.3 Analysis of Project Impacts

Threshold (j): ***Would the project result in 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?***

Construction Impacts

Noise impacts associated with the housing Project demolition and construction include short-term impacts. Noise impacts associated with Project operations would be long-term impacts. Construction activities, especially heavy equipment operation, would create noise effects on and adjacent to the construction site.[65] Long-term noise impacts include Project-generated onsite and offsite operational noise sources. Onsite (stationary) noise sources would include operation of mechanical equipment such as air conditioners, landscape and building maintenance. Offsite noise would be attributable to Project-induced traffic, which would cause an incremental increase in noise levels within and near the Project vicinity.

The combinations of pieces of equipment (see **Table 4.9-6**) in all subphases of construction would result in short-term increases in exposures of nearby sensitive receivers of more than 5 dBA. These increases are shown in **Table 4.9-7**. In Phase I, the increase over ambient would range from 13.1 to 37.3 dBA L_{eq}. In Phase II, the increase would range from 23.3 to 40.2. These increases would exceed the 5-dBA significance threshold at all receptors for both phases.

Mitigation measures N-1 through N-5 would result in an appreciable decrease in exposures, but these short-term exposures would still be significant sometimes during construction. Therefore, Project impacts related to increased noise levels during construction would be significant and unavoidable after mitigation.

65 Noise from trucks used to haul construction materials to the site and waste materials away from the site was considered to be of minor importance. There would be an average of four truck trips per day. Their passage by a sensitive receiver would be a little blip that contributes almost nothing to the hourly L_{eq} values.

Table 4.9-7
SHORT-TERM NOISE EXPOSURES DURING CONSTRUCTION

Sensitive Receptor[a]	Phase I		Phase II	
	One-Hour Construction Noise Exposure dBA L_{eq}	Increase Over Ambient dBA L_{eq}	One-Hour Construction Noise Exposure dBA L_{eq}	Increase Over Ambient dBA L_{eq}
RH-2	87.2	37.3		
RH-3			88.6	40.2
1	72.6	13.1	86.5	26.8
3	85.1	32.6	88.1	35.6
5	69.6	21.1	71.8	23.3

[a]Receptor points are shown in **Figure 4.9-1** and **Figure 4.9-2**.

Permanent (Operational) Impacts

The Project would replace the existing buildings, and it would increase the number of residents. However, the Project would not introduce major new onsite noise sources or bring existing noise sources closer to sensitive receivers.

In a residential area, traffic noise predominates. Rooftop equipment usually emits about 50 to 55 dB at 50 feet. Trash pickup may be loud but it is for only a few minutes or so once a week, so does not contribute to the hourly L_{eq}. Noise from radios, televisions and other entertainment devices may be loud but it is limited by the City's municipal code. The ambient noise values in Table 4.9-3 are typical of onsite background noise, since the measurement points were shielded to a large extent from traffic. The three onsite L_{eq} values average 50.2 dBA. With an increase to the proposed number of residents from 221 to 656, and the assumption that the noise generated is proportional to the number of residents, the new noise generation would be about 54.9 dBA. Given all the buildings onsite, this noise would substantially be blocked before it left the Project Site. In any event, the unblocked increase of about 4.7 dBA would not be significant. **Therefore, there would be no change in exposure to the community and the impact would be less than significant.**

For offsite, onroad noise impacts to be significant, it is generally necessary for traffic to double.[66] Intersection turning counts extracted by KOA from the traffic impact study[67] were used to estimate traffic along segments in the Project area during the a.m. peak hour. The turning data were for the future without Project and future with Project scenarios. **Table 4.9-8** shows the results of the analysis. The maximum increase in traffic on the segments studied would be about 26 percent, which is far less than a doubling. For one segment, McKenzie Avenue between Browne Avenue and Mercury Avenue, traffic would decrease because of the Project. **The noise level increase due to the Project would be less than significant.**

66 Technical Noise Supplement. Prepared by ICF Jones & Stokes, Sacramento, California for California Department of Transportation (Caltrans), Sacramento, California (November 2009), p. 2-12.

67 Email transmission of data from Brian Marchetti, KOA Corporation to Michael Rogozen, UltraSystems Environmental Incorporated. October 29, 2018 and February 8, 2019.

Table 4.9-8
INCREASE IN ROAD SEGMENT TRAFFIC DUE TO PROJECT

Definition of Street Segments			A.M. Peak Hour Traffic in Segment (vehicles)		
Street Segment	**Between**	**Direction**	**Future Without Project**	**Future With Project**	**Percent Change**
Huntington Drive	Topaz Street and Monterey Road	E-W	3,905	3,910	0.13
Monterey Road	Huntington Drive and Browne Avenue/Huntington Drive North	N-S	1,711	1,807	5.61
Huntington Drive North	Browne Avenue and Mercury Avenue	N-S	396	498	25.76
Mercury Avenue	McKenzie Avenue and Huntington Drive North	E-W	323	331	2.48
McKenzie Avenue	Browne Avenue and Mercury Avenue	N-S	123	113	(8.13)
Mercury Avenue	Boundary Avenue and McKenzie Avenue	E-W	270	264	8.89

Threshold (k): Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

It is expected that ground-borne vibration from Project construction activities would cause only intermittent, localized intrusion. The Project's construction activities most likely to cause vibration impacts are:

- **Heavy Construction Equipment:** Although all heavy, mobile construction equipment has the potential of causing at least some perceptible vibration while operating close to buildings, the vibration is usually short-term and is not of sufficient magnitude to cause building damage. It is not expected that heavy equipment such as large bulldozers would operate closely enough to any sensitive receivers to cause vibration impact.

- **Trucks:** Trucks hauling building materials to construction sites can be sources of vibration intrusion if the haul routes pass through residential neighborhoods on streets with bumps or potholes. Repairing the bumps and potholes almost always eliminates the problem.

The FTA (2018) has published standard vibration levels for construction equipment operations, at a reference distance of 25 feet. The smallest distance from a sensitive receiver and construction activity for this Project is 49 feet. The calculated vibration levels expressed in VdB and PPV for typical construction equipment at distances of 25, 50, and 49 feet are listed in **Table 4.9-9**.[68]

68 As seen in Table 4.9-3, the nearest sensitive vibration receivers would be offsite residents.

Table 4.9-9
VIBRATION LEVELS OF TYPICAL CONSTRUCTION EQUIPMENT

Equipment	PPV at 25 feet (in/sec)	Vibration Decibels at 25 feet (VdB)	PPV at 50 feet (in/sec)	Vibration Decibels at 50 feet (VdB)	PPV At 49 feet (in/sec)[a]	Vibration Decibels at 49 feet (VdB)[a]
Loaded trucks	0.076	86	0.0269	77	0.0277	77
Jack hammer	0.035	79	0.0124	70	0.0128	70
Small bulldozer	0.003	58	0.0011	49	0.0011	49

Source: Calculated by UltraSystems from FTA data (FTA, 2018).
[a] Minimum distance from nearest offsite residence to onsite construction activity.

As discussed in **Section 4.9.2.2**, the FTA's annoyance thresholds for vibration depend upon the frequency of vibration events. The CalEEMod analysis presented in **Section 4.2** estimated 345 truck trips during Phase II demolition. It was assumed that trucks would arrive at the Project Site unloaded and leave loaded. Thus, there would be 345 loaded truck trips in 82 days, or about four per day, a value less than 30 events per day. Therefore, truck-related ground-borne vibration events were considered to be infrequent for the purpose of this analysis. As a worst case, other types of vibration events were assumed to be frequent.

As shown in **Table 4.9-9**, the vibration level of construction equipment at the nearest sensitive receiver (49 feet) is at most 0.0277 inch per second, which is less than the FTA damage threshold of 0.12 inch per second PPV for fragile historic buildings. The maximum vibration exposures from loaded trucks would be 77 VdB, which is less than the FTA threshold for human annoyance of 80 VdB for infrequent exposure. For other equipment the exposure would be less than or equal to 70 VdB, which is less than the thresholds of 72 and 75 VdB for the relevant receiver categories. Vibration impacts during construction would therefore be less than significant, and no mitigation is necessary.

Residential operations do not involve sources that cause substantial ground-borne vibration. **Therefore, the Project would not result in long-term significant impacts due to ground-borne vibration or noise levels. No mitigation is necessary for operational vibration impacts.**

Threshold (l): ***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?***

As discussed in the Initial Study prepared for the Project, which is include as **Appendix B1** of this Draft EIR, the nearest airport to the Project Site is the El Monte Airport, located approximately 9 miles to the southeast (Google Earth Pro, 2018). The Project Site is not located within an airport influence area or within the vicinity of a private airstrip (County of Los Angeles ALUC, 2012 and Google Earth Pro, 2018). The Project would not expose people to excessive aircraft noise levels. Therefore, no impact would occur. **Thus, the Project would have no impact with respect to Threshold (c). No impacts from airport or airstrip noise would occur and no mitigation is required.**

4.9.4 Cumulative Impacts

Cumulative construction impacts could occur if other construction projects were active concurrently with development of the proposed Project, and near enough so that noise from two or more projects were perceived by the same sensitive receivers. However, the area surrounding the Project Site is almost completely built out, and there is limited space for new development. **Currently, there are no planned or reasonably foreseeable future projects that could generate additional construction noise in the immediate Project vicinity. Therefore, cumulative construction noise impacts would be less than significant.**

4.9.5 Mitigation Measures

Construction Noise

As analyzed above in Threshold (a), use of onsite construction equipment during Project construction would have the potential to result in significant noise impacts. Therefore, the following measures are provided to reduce the construction-related noise impacts:

N-1: The construction contractor will conduct noise monitoring near sensitive receivers identified for this Project, during the suspected noise producing construction activities. During times that active construction equipment is within 200 feet of a residence or other sensitive receiver, noise measurements will be taken for at least three 15-minute periods per hour for two hours. If the monitored noise levels exceed background (ambient) noise levels by 5 dB or feet of a residence or other sensitive receiver for two or more 15-minute periods per hour, then the construction contractor will mitigate noise levels using temporary noise shields, noise barriers or other mitigation measures to comply with those restrictions or standards. (See mitigation measures **N-2** and **N-3** below.)

N-2: The construction contractor will use the following source controls, in response to complaints and/or when ambient noise monitoring of complainant's exposure shows that noise from construction exceeds ambient levels by at least 5 dBA, except where not physically feasible:

- Use of noise producing equipment will be limited to the interval from 8:00 a.m. to 5:00 p.m., Monday through Friday.
- For all noise producing equipment, use types and models that have the lowest horsepower and the lowest noise generating potential practical for their intended use.
- The construction contractor will ensure that all construction equipment, fixed or mobile, is properly operating (tuned up) and lubricated, and that mufflers are working adequately.
- Have only necessary equipment on site.

- Use manually adjustable or ambient sensitive backup alarms.[69]

N-3: The contractor will use the following path controls, in response to complaints and when ambient noise monitoring of complainant's exposure shows exceedance of local standards, except where not physically feasible:

- Install portable noise barriers, including solid structures and noise blankets, between the active noise sources and the nearest noise receivers.
- Temporarily enclose localized and stationary noise sources.
- Store and maintain equipment, building materials and waste materials as far as practical from as many sensitive receivers as practical.

N-4: Advance notice of the start of construction shall be delivered to all noise-sensitive receivers adjacent to the Project area. The notice shall state specifically where and when construction activities will occur, and provide contact information for filing noise complaints with the contractor and the City.

N-5: Before issuance of a building permit, the building contractor shall prepare, and the City shall review and approve, a Construction Noise Control Plan. The plan shall include and describe in detail how mitigation measures **N-1** though **N-4** will be implemented.

Operational Noise

As discussed above, operation of the Project would not result in a significant impact. Therefore, no mitigation is required.

4.9.6 Level of Significance After Mitigation

Construction Noise

Mitigation measures **N-1** through **N-5** would result in an appreciable decrease in exposures, but these short-term exposures would still be significant sometimes during construction. Therefore, Project impacts related to increased noise levels during construction would be significant and unavoidable after mitigation.

69 These are backup alarms that focus their noise on a specific area and/or automatically adjust the volume of the noise to be only slightly above that of the ambient level at the worksite.

4.10 Population and Housing

4.10.1 Introduction

This section analyses the proposed Project's potential impacts regarding population and housing. Cumulative Project information is from the Traffic Impact Report (**Appendix O**) prepared for the Project. Information in this section is based on housing and population information from the Housing Authority of Los Angeles, the Southern California Association of Governments (SCAG), and United States Census. Potential growth inducing impacts of the proposed Project are discussed in **Section 6.4** of this document.

4.10.2 Environmental Setting

4.10.2.1 Regulatory Framework

Federal

There are no federal regulations that pertain to this issue area.

State

There are no state regulations that pertain to this issue area.

Regional

Southern California Association of Governments

SCAG is the designated regional planning agency for the following six counties in Southern California: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. SCAG is a Joint Powers Authority under California state law, established as an association of local governments that voluntarily convene to address regional issues. Under federal law, SCAG is designated as a Metropolitan Planning Organization and under state law as a Regional Transportation Planning Agency and a Council of Government (SCAG, 2018a).

SCAG Regional Comprehensive Plan

SCAG's most recent Regional Comprehensive Plan (RCP), was released on February 9, 2009. The RCP is a major advisory plan prepared that addresses important regional issues like housing, traffic/transportation, water, and air quality. The RCP serves as an advisory document to local agencies in the Southern California region for their information and voluntary use for preparing local plans and handling local issues of regional significance (SCAG, 2018b).

SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

In April 2016, SCAG's Regional Council adopted the 2016-2040 RTP/SCS, which analyzes the impacts of its decisions, policies, strategies and development projects on the environment, the economy and social equity. The 2016 - 2040 RTP/SCS envisions vibrant, livable communities that are healthy and safe with transportation options that provide easy access to schools, jobs, services, health care and other basic needs (SCAG, 2016, p. 13).

The 2016–2040 RTP/SCS provides the transportation vision for the region through the year 2040 and provides a long-term investment framework for addressing regional transportation and related challenges (SCAG, 2016, p. 17). The RTP/SCS balances the region's future mobility and housing needs with economic, environmental and public health goals. The RTP/SCS is required by the State of California and the federal government and is updated by SCAG every four years as demographic, economic and policy circumstances change. The 2016-2040 RTP/SCS is a living, evolving blueprint for the region's future (SCAG, 2016, p. 2).

The 2016–2040 RTP/SCS identifies the amount of expected growth in the region and provides the expected distribution of that growth. The distribution reflects goals cited in the 2016-2040 RTP/SCS:

- Aligning the plan investments and policies with improving regional economic development and competitiveness.
- Maximizing mobility and accessibility.
- Ensuring travel safety and reliability for all people and goods in the region.
- Preserving and ensuring a sustainable regional transportation system.
- Maximizing productivity of the transportation system.
- Protecting the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).
- Actively encouraging and creating incentives for energy efficiency, where possible.
- Encouraging land use and growth patterns that facilitate transit and non-motorized transportation.
- Maximizing the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.

The 2016 RTP/SCS plans for focusing new growth around transit, including High Quality Transit Areas (HQTAs). HQTAs are "areas within one half mile of a fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes or less during peak commuting hours. While HQTAs account for only three percent of total land area in SCAG region, they are planned and projected to accommodate 46 percent of the region's future household growth and 55 percent of the future employment growth" (SCAG, 2016, pp. 7-8). "As housing density increases in cities and HQTAs, local governments are investing in pedestrian and bike infrastructure and reducing parking requirements to support people who choose not to have a car or cannot afford one. Local jurisdictions are also creating and retaining affordable housing near transit, helping to increase connectivity to employment opportunities and reducing reliance on automobile ownership" (SCAG, 2016, p. 25).

Regional Housing Needs Assessment

The Regional Housing Needs Assessment (RHNA) quantifies the need for housing within each jurisdiction during specified planning periods. The 5th Cycle RHNA Allocation Plan, which covers the planning period from October 2013 to October 2021, was adopted by the Regional Council of SCAG

on October 4, 2012. Communities use the RHNA in land use planning, prioritizing local resource allocation, and in deciding how to address identified existing and future housing needs resulting from population, employment and household growth. The RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth, so that collectively the region and sub-region can grow in ways that enhance quality of life, improve access to jobs, promote transportation mobility, and address social equity and fair share housing needs. Local jurisdictions are required by State law to update their General Plan Housing Elements based on the most recently adopted RHNA allocation (SCAG, 2012).

The City of Los Angeles is not currently meeting their Regional Housing Needs Allocation, as described in **Section 4.8** of this document. Chapter 1, Housing Needs Assessment of the City of Los Angeles General Plan states (City of Los Angeles Department of City Planning, 2018a, p.1-78): Under California state law, every jurisdiction is obligated to provide housing to meet its "fair share" of the regional need. The California Department of Housing and Community Development is mandated to determine the state-wide housing need for a given planning period. In order to do this, the California Department of Housing and Community Development works with regional Councils of Government to determine growth projections for the areas they represent. This growth projection is then translated into a RHNA, which consists of the total number of new units required to meet the growth needs. For the RHNA cycle from January 1, 2014 through September 30, 2020, the California Department of Housing and Community Development (HCD) determined that the City of Los Angeles needs to provide 82,001 units. Of these, 20,426 are for very low-income, 12,435 are for low-income, 13,728 are for moderate income and 35,412 are for above moderate-income households (City of Los Angeles Department of City Planning, 2018a, pp.1-78 and 1-79).

As of December 2018, the City of Los Angeles has not currently met their RHNA goals, as detailed in data provided by HCD, the City of Los Angeles is listed as a city that is subject to Senate Bill 35[70] streamlining provisions because it has made insufficient progress towards its Lower Income RHNA (Very Low and Low Income) requirements (HCD, 2018a, p. 5). Additionally, as detailed in HCD's 5th Cycle Annual Progress Report Permit Summary (HCD, 2018b), the City of Los Angeles has only met:

- 15.5 percent of its Very Low Income (VLI) housing requirements (17,263 VLI units remain to be constructed).
- 18.2 percent of its Lower Income (LI) housing requirements (10,173 LI units remain to be constructed).
- 1.9 percent of its Moderate Income (MI) housing units (13,466 units remain to be constructed).
- and has exceeded its Above Moderate Income (AMI) housing units by 152.9 percent (0 units remain to be constructed- 54,151 units have been constructed).

70 Senate Bill 35, which took effect on January 1, 2018, applies to cities and counties that have not made sufficient progress toward their affordable housing goals for above-moderate and lower income levels. If it is determined that the jurisdiction's RHNA goals are not met, the bill requires that cities and counties streamline their review and provide ministerial approval for qualifying affordable housing projects. This process entails a shorter time frame for project review and approval and eliminates the need for public hearings (California Legislative Information, 2017b).

Local

City of Los Angeles General Plan

All cities and counties are required by state law to prepare and adopt a long-range comprehensive General Plan to guide future development and to identify the community's environmental, social, and economic goals. As detailed in § 65302 of the California Government Code, "The general plan shall consist of a statement of development policies and shall include a diagram or diagrams and text setting forth objectives, principles, standards, and plan proposals." (California Legislative Information, 2017).

The City of Los Angeles' Citywide General Plan Framework Element establishes the broad overall policy and direction for the entire General Plan. It provides a citywide context and a long-range strategy to guide the comprehensive update of the General Plan's other elements. The City's 35 community plans collectively comprise the Land Use Element of the General Plan. The City's General Plan has the following elements: Plan for a Healthy Los Angeles; Framework Element; Air Quality Element; Conservation Element; Housing Element; Noise Element; Open Space Element; Service Systems Element/Public Recreation Plan; Safety Element; and Mobility Element.

City of Los Angeles General Plan Framework

The City's General Plan Framework Element is a strategy for long-term growth which sets a citywide context to guide the update of the community plan and citywide elements. The Framework Element sets forth a citywide comprehensive long-range growth strategy. It defines citywide policies that will be implemented through subsequent amendments of the City's community plans, zoning ordinances, and other pertinent programs. The General Plan Framework defines citywide policies that influence most of the City's General Plan Elements and it includes policies for: land use; housing; urban form and neighborhood design; open space and conservation; economic development; transportation; and infrastructure/public services (City of Los Angeles Department of City Planning, 2018a).

City of Los Angeles General Plan Housing Element

The Housing Element of the City of Los Angeles General Plan was adopted on December 3, 2013 and provides guidance for housing development within the city for the years 2013 to 2021. It provides a comprehensive overview and analysis of the current housing stock in the city; the constraints on housing maintenance, improvement, and development; an inventory of sites for housing development; opportunities for energy conservation; a review of the previous housing element, which covered years 2006 to 2014; and housing goals, policies, objectives, and programs to provide diverse housing across the city. Housing Element policies that are applicable to the proposed Project include:

- 1.1.2 Expand affordable rental housing for all income groups that need assistance.
- 1.2.3 Rehabilitate and/or replace substandard housing with housing that is decent, safe, healthy and affordable and of appropriate size to meet the City's current and future household needs.
- 2.2.5 Provide sufficient services and amenities to support the planned population while preserving the neighborhood for those currently there.

- 2.4.1 Promote preservation of neighborhood character in balance with facilitating new development.

- 2.5.2 Foster the development of new affordable housing units citywide and within each Community Plan area.

Community Plan

The Community Plan, last revised in September 2016, is a plan under the City of Los Angeles General Plan Land Use Element that guides land use for the Northeast Los Angeles community. The plan also includes residential and commercial objectives and policies that establish a development concept for its neighborhoods and districts. Key provisions that are applicable to the proposed Project include (City of Los Angeles, 2016):

Residential Objectives:

- **Goal 1:** A safe, secure, and attractive residential environment for all economic, age, and ethnic segments of the community.

- **Objective 1-6:** To promote and ensure the provision of fair and equal housing opportunities for all persons regardless of income and age groups or ethnic, religious, or racial background.

- **Policy 1.6-3:** Ensure that redevelopment activity minimizes displacement of residents.

Sustainable City pLAn

The City of Los Angeles released the Sustainable City (pLAn) on April 8, 2015 which provides guidance for achieving sustainability through short-term and long-term goals for a clean environmental and strong economy. The Housing and Development Chapter of the pLAn states: "The availability and affordability of housing are among the most visible and important economic issues facing Angelenos today. They're also critical elements to a strong and thriving Los Angeles. The pLAn and its strategic initiatives aim to ease housing costs, lower utility bills, promote appropriate development, encourage housing around transit hubs, and increase the production and preservation of affordable housing" (City of Los Angeles, 2018a, p. 48). Key provisions of the pLAn relevant to housing include the following goals (City of Los Angeles, 2018a, p. 49):

- Construction of 17,000 new housing units within 1,500 feet of transit by 2017.

- Increase cumulative new housing unit construction to 100,000 by 2021, leading to 150,000 new housing units by 2025.

- Reduce the number of rent-burdened households by at least 15 percentage points by 2025.

4.10.2.2 Existing Conditions

Onsite Conditions

The existing public housing complex is comprised of 15 structures. Fourteen structures include 100 multi-family units, and one structure is an administration building with offices and a common

room with a kitchen, pantry, and two bathrooms. Buildings throughout the complex are rectangular in shape and are generally arranged in parallel groupings. These groupings include:

- the North Block comprising the administration building facing Florizel Street;
- the Western Block comprising three rectangular apartment buildings;
- the Eastern Block comprising one rectangular-shaped and four square-shaped apartment buildings located along the eastern portion of the site; and
- the Southern Block comprising six rectangular apartment buildings.

Generally, there are five different building types located onsite, all of which are either one or two stories in height, and consist of wood-frame construction, concrete slab foundations, and composition roofing. Parking for the complex consists of paved surface parking areas located along both sides of the driveway that bisects the northern and southern blocks of the Rose Hill Courts complex.

Population, Housing, and Employment Estimates

The Project Site is within the Community Plan. Rental units in the community house an average of 3.13 persons per unit and owner-occupied units house an average of 3.15 persons per unit. The existing Project Site contains 100 units. As of January 2019, there are 221 residents living at Rose Hill Courts.[71]

SCAG develops socioeconomic estimates and growth projections including population, households, and employment for cities and transportation analysis zones in the SCAG region through enhanced forecasting methods and interactive public outreach. Population, household and employment estimates, and forecasts are maintained at the jurisdictional and county unincorporated level. Secondary variables including population, household and employment characteristics, single and multiple households, or employment by sectors, are further estimated and projected. SCAG's 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy Final Growth Forecast by Jurisdiction for the City of Los Angeles in 2020 is: 4,017,000 persons, 1,441,400 households, and 1,899,500 jobs (employment) (SCAG, 2018c).

To estimate the existing population for the area in which the Project Site is located, block group data was looked up using census data for block groups (BGs). BGs are statistical divisions of census tracts, are generally defined to contain between 600 and 3,000 people, and are used to present data and control block numbering. A block group consists of clusters of blocks within the same census tract that have the same first digit of their four-digit census block number (Census, 2018a).

Using the American Factfinder database on the Census website, the Project is located within Block Group 2 in Census Tract 2013.01, in Los Angeles County, California (Census, 2018b). The estimated population for 2016 for Block Group 2 in Census Tract 2013.01 was 2,279 persons (Census, 2018c) and the estimated number of housing units was 625 (Census, 2018d). Information from the 2016 RTP/SCS was obtained regarding projected population, housing, and employment estimates for the City of Los Angeles. The SCAG 2016 RTP/SCS, Demographics and Growth Forecast Appendix (page 24) provides demographic data for the years 2012 and 2040. The regional growth forecast reflects recent and past trends; key demographic and economic assumptions; and local, regional, state or national policies (SCAG, 2016, p. 1 of the Demographics & Growth Forecast Appendix).

71 Email correspondence between the Housing Authority of Los Angeles and Related on January 22, 2019.

Table 4.10-1 below shows the projected population, housing and employment estimates for the City of Los Angeles from the SCAG RTP/SCS.

Table 4.10-1
PROJECTED POPULATION, HOUSING, AND EMPLOYMENT ESTIMATES FOR THE CITY OF LOS ANGELES

	SCAG 2012 Data[1]	SCAG Projection Horizon (2040) [1]		
		Projected[1]	Total Growth from 2012	Percentage Increase from 2012
Population	3,845,500	4,609,400	763,900	19.8
Household	1,325,500	1,690,300	364,800	27.5
Employment	1,696,400	2,169,100	472,700	27.8

Source: [1] SCAG, 2016 RTP/SCS Appendix: Demographics & Growth Forecast, Table 11, p. 24.

Population

As depicted in **Table 4.10-1** above, the population of the City of Los Angeles is anticipated to grow by approximately 763,900 persons compared to 2012 conditions, which equates to a nearly 20 percent increase in population by the year 2040.

Housing

As depicted in **Table 4.10-1** above, the number of households in the City of Los Angeles is anticipated to grow by approximately 364,800 compared to 2012 conditions, which equates to an increase of over 27 percent by the year 2040.

Employment

As depicted in **Table 4.10-1** above, the number of jobs (employment) in the City of Los Angeles is anticipated to grow by approximately 472,700 compared to 2012 conditions, which equates to an increase of over 27 percent by the year 2040.

4.10.3 Project Impacts

4.10.3.1 Thresholds of Significance

In accordance with State CEQA Guidelines Appendix G, the Project would have a significant impact related to population and housing if it would:

Threshold (a): ***Induce substantial unplanned population growth in an area, either directly or indirectly (for example, by proposing new homes and businesses) or***

indirectly (for example, through extension of roads or other infrastructure); or

Threshold (b): ***Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.***

For this analysis, the Appendix G Thresholds are relied upon.

4.10.3.2 Methodology

The analysis of the Project's potential impacts to population, housing, and employment are based on a comparison of the Project's contribution in light of City of Los Angeles projections and policies regarding population, housing, and employment.

The Project's estimated residential population is based upon correspondence from the Project applicant, Related, on January 17, 2019 regarding the estimated population of the Project based on the number of bedrooms and the number of persons per bedroom. Future population, housing, and employment data in this section is based upon SCAG's 2016 RTP/SCS document as well as information from the United States Census. The region is projected to grow to 22 million people by 2040—an increase of nearly four million people (SCAG, 2016, p. 3). Construction employment information was provided by the Project applicant. Project workforce will vary based on the scheduled activities to over 100 at peak with a projected average of 40-60 workers per day. The applicant has estimated that there would be a total of six employees working at the Project Site upon Project development.

4.10.3.3 Analysis of Project Impacts

Threshold (a): ***Would the Project induce substantial unplanned population growth in an area, either directly or indirectly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?***

As discussed in the Initial Study prepared for the Project, which is included as **Appendix B1** of this Draft EIR, the Project would not induce substantial unplanned population growth. Construction jobs created by the Project would not result in substantial population growth in the Project area because construction jobs are temporary in nature. It is anticipated that persons filling construction jobs would be from the Los Angeles area and as such, construction workers would not move or relocate to work at the Project Site from outside the Los Angeles area during Project construction. Thus, the construction jobs generated by the Project would not induce substantial population or housing growth within the region.

The Project proposes to increase the number of persons living on the Project Site, compared to existing conditions. The net increase of 435 persons as part of the proposed Project would not result in any unplanned population growth. As depicted in **Table 4.10-1** above, the population of the City of Los Angeles is anticipated to grow by approximately 763,900 persons compared to 2012 conditions, which equates to a nearly 20 percent increase in population by the year 2040. Therefore, the Project's estimated net increase of 435 persons was anticipated in SCAG's projections of population increase through the year 2040. The Project would not indirectly induce growth in the Project area because public infrastructure currently exists at the Project Site. The Project would not introduce infrastructure to a site that does not already contain infrastructure for electricity, gas,

water, and sewer services. Thus, the Project would not indirectly induce growth in the Project area. **Thus, the Project would have a less than significant impact with regard to inducing substantial population or housing growth and regarding inducing growth in the Project area, either directly or indirectly. No further analysis is required.**

Threshold (b): Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

The Project would demolish existing residential structures on the Project Site in two phases. During Phase I, 20 units and a community center would be demolished and during Phase II, 80 units would be demolished. At Project completion, the Project Site would contain 185 dwelling units.

Before any tenant relocation occurs, HACLA must approve the Project's Relocation Plan, which is currently under development (49 CFR 24 Subpart C). Consistent with HUD regulations for the treatment of itinerants, current residents who are in good standing will have the option to return to the property after construction is complete. Residents living in those units within the footprint of Phase I who wish to return, will be temporarily relocated until construction of the buildings are complete. The residents who are living in the existing buildings within the footprint of Phase II will be moved and assisted into the Phase I units upon completion. Residents will be provided relocation counseling, compensation for moving expenses, and provided with decent, safe and sanitary housing choices. Additionally, the Relocation Plan will be considered by HACLA'S Board of Commissioners and HACLA, prior to any development at Rose Hill Courts. For relocation activities, Related/HACLA will take into consideration individual household preferences and needs to be close to public transportation, employment, schools, medical/public/social services and agencies, recreational services, parks, community centers, and/or shopping and will attempt to accommodate households by moving them to an available unit onsite. If such a unit is not available, the next preferred option will be for households to relocate into a nearby motel or an apartment unit and return to Rose Hill Courts as soon as construction of Phase I is complete and the unit is ready for occupancy. For households that prefer to accept a HACLA-issued Tenant Section 8 Voucher or Tenant Protection Voucher and permanently relocate from Rose Hill Courts, full relocation assistance for permanent replacement housing will be available.

The Project would nearly double the number of housing units onsite (100 existing compared to 185 proposed) and would not require the construction of replacement housing elsewhere due to temporary relocation of tenants. Therefore, the Project would have a less than significant impact in this regard.

The Project would generate approximately 286 permanent residents in the first phase of development and approximately 370 permanent residents in the second phase of development, resulting in a total of 656 residents, which is 435 more residents, compared to January 2019 conditions.

The Project would demolish existing residential structures on the Project Site in two phases. Residents of the buildings demolished during Phase I would be relocated in accordance with an approved Relocation Plan. After Phase I construction activities are completed, residents of buildings planned for demolition during Phase II would relocate to the newly constructed dwelling units or permanently relocate offsite.

Before any resident relocation occurs, HUD must approve the Project's Relocation Plan, which is currently under development (49 CFR 24 Subpart C). Consistent with HUD regulations for the

treatment of itinerants, current residents who are in good standing will have the option to return to the property after construction is complete. Residents living within the footprint of Phase I who wish to return, will be temporarily relocated until construction of the buildings is complete. All families will receive relocation assistance. If a few families cannot be accommodated in Phase I they will be provided with a tenant voucher and if they desire to move back, will be provided with the right to return to Phase II. The Project would result in temporary short-term displacement and relocation of the existing tenants residing on the Project Site while units are rehabilitated. When the residents return to a renovated unit, the households would need to be "right sized" under the new Section 8 occupancy standards and therefore not all residents may be able to return to a right size unit in Phase I. Those residents would be provided with the choice of availing a portable Section 8 voucher and relocation assistance, which would allow them to move permanently off site or move into a right sized unit in Phase II. Residents will be provided relocation counseling, compensation for moving expenses, and provided with decent, safe and sanitary housing choices. Additionally, the Relocation Plan will be considered by the HACLA Board, prior to any development. **Therefore, impacts associated with the displacement of people would be less than significant.**

4.10.4 Cumulative Impacts

To determine the cumulative effects of the Project, this section includes a review of past, present, and reasonably foreseeable future projects in the vicinity of the Project area and provides an analysis of their short- and long-term incremental effects on the local environment. The combined, incremental effects of human activity, referred to as cumulative impacts, accumulate over time, from one or more sources, and can result in the degradation of important resources. The cumulative projects taken into consideration are those that were accounted for in the traffic impact analysis for the Project. **Figure 4.10-1** below shows the location of cumulative projects. Those projects are included as Attachment E to **Appendix O** of this Draft EIR document.

The estimated population resulting from the cumulative projects listed above was calculated using the Citywide Person Per Household factor of 2.83 as published in Census Quickfacts for the City of Los Angeles (2013-2017) (Census Quickfacts, 2019). Based on the table above, there are a total of 157 dwelling units. 157 units multiplied by 2.83 persons per household results in an estimated cumulative increase in population of approximately 435 persons. This number of persons was accounted for in the City of Los Angeles General Plan and therefore, the Project's anticipated population combined with the anticipated population of cumulative projects would be less than significant.

The Project is located in an urban and developed area. The Project Site can be accessed using the existing street system and the Project Site is served by existing utilities and infrastructure. The Project would nearly double the number of housing units onsite (100 existing compared to 185 proposed) and would not require the construction of replacement housing elsewhere due to temporary relocation of tenants. Before any tenant relocation occurs, HACLA must approve the Project's relocation plan, which is currently under development (49 CFR 24 Subpart C). Consistent with HUD regulations for the treatment of itinerants, current residents who are in good standing will have the option to return to the property after construction is complete. **Therefore, the Project would have less than significant cumulative impacts related to population and housing.**

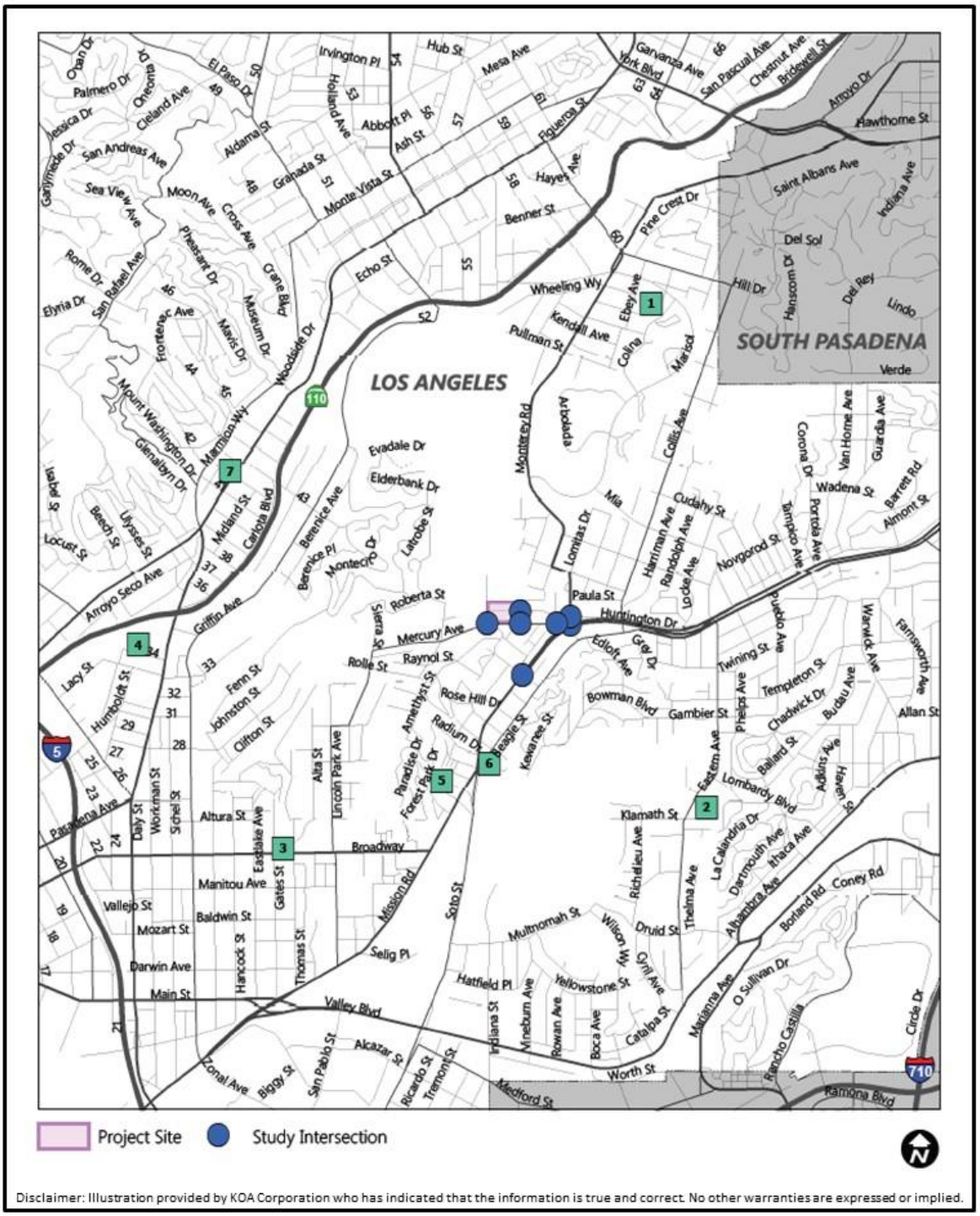
4.10.5 Mitigation Measures

The Project would result in less than significant impacts with respect to population and housing. Therefore, no mitigation measures are required.

4.10.6 Level of Significance after Mitigation

Project impacts were determined to be less than significant for population and housing and no mitigation measures would be required.

Figure 4.10-1
CUMULATIVE PROJECT LOCATIONS



Sources: KOA Corporation, July 2019

UltraSystems

Rose Hill Courts Redevelopment

Cumulative Project Locations

4.11 Public Services

4.11.a Fire Protection

4.11.a.1 Introduction

This section of the draft EIR discusses the Project's impacts on fire protection services. This section describes the existing fire protection services and facilities in the Project area and analyzes: 1) if the existing fire protection services and facilities would be sufficient to accommodate the Project; 2) the impacts of the Project on existing fire protection services and facilities; and 3) Project's consistency with the applicable regulatory requirements related to fire protection services.

4.11.a.2 Environmental Setting

4.11.a.2.1 Regulatory Framework

Federal

Occupational Safety and Health Act

The Occupational Safety and Health Act of 1970 led to foundation of the Occupational Safety and Health Administration to assure safe and healthful working conditions for all workers by setting and enforcing standards and by providing training and education. The required safety and health regulations for construction sites are included in the Code of Federal Regulations, Title 29, Part 1926. Safety requirements related to fire protection and prevention for construction sites are provided in Part 1926, Subpart F, and generally include; provision of fire suppression and fire-fighting equipment on construction sites, sufficient water supply, and requirement for keeping storage sites free from accumulation of unnecessary combustible materials. In California, the Division of Occupational Safety and Health, also known as Cal/OSHA is responsible for administering these safety and health requirements.

State

California Code of Regulations, Title 24, Part 2, California Building Code

Current law states that every local agency enforcing building regulations, such as cities and counties, must adopt the provisions of the California Building Code (CBC) within 180 days of its publication date, which is established by the California Building Standards Commission. The most recent building standard adopted by the legislature and used throughout the state is the 2016 version of the CBC, often with local, more restrictive amendments that are based on local geographic, topographic, or climatic conditions. The CBC is updated on a three-year cycle, and the 2016 CBC took effect on January 1, 2017. The building standards in the California Building Code apply to all locations in California, except where more stringent standards have been adopted by state agencies and local governing bodies.

Requirements for structures in Fire Hazard Severity Zones are provided in Chapter 7A of the CBC, "Materials and Construction Methods for Exterior Wildfire Exposure," and Chapter 49 of the California Fire Code, "Requirements for Wildland-Urban Interface Fire Areas." Requirements in these two chapters cover roofing; attic ventilation; exterior walls; exterior windows and glazing; exterior doors; decking; protection of underfloor, appendages, and floor projections; and ancillary structures.

California Code of Regulations, Title 24, Part 9, California Fire Code

Requirements in the California Fire Code (CFC) are for building and equipment design, such as fire-rated construction, alarm systems, sprinkler systems, and means of egress; requirements for specific land uses, including airports, dry cleaners, gas stations, and automotive service businesses; hazardous materials; fire flow requirements; and fire hydrant spacing. Other fire safety requirements of the CFC are related to the provision of fire resistance standards for doors, building materials, and particular types of construction, and clearance of debris within a prescribed distance from occupied structures within wildfire hazard areas. The CFC is updated on a three-year cycle, and the 2016 CFC took effect on January 1, 2017.

Local

City of Los Angeles Charter

According to the City of Los Angeles Charter, Section 520, it is the Los Angeles Fire Department's (LAFD) duty to control and extinguish injurious or dangerous fires and remove potential causes for those fires. The LAFD is required to enforce all ordinances and laws related to the prevention and spread of fires, fire control, and fire hazards within the City, and conduct fire investigations and protect lives and property in case of a disaster or public calamity.

Los Angeles Municipal Code

The Los Angeles Municipal Code (LAMC) contains, by reference, the CBC building construction standards, including the CFC. Chapter V, Article 7, Fire Prevention and Protection of the LAMC includes standards for the prevention of fires, investigation and elimination of fires and life safety hazards in buildings, and maintenance of fire protection systems. Pursuant to § 57.09.07A of the LAMC, the maximum response distance between residential land uses and a LAFD fire station that houses an engine or truck company is 1.5 miles; while for a commercial land use, the distance is one mile for an engine company and 1.5 miles for a truck company. If either of these distances is exceeded, all structures located in the applicable residential or commercial area would be required to install automatic fire sprinkler systems. With such systems installed, fire protection would be considered adequate even if the project is located beyond the maximum response distance.

City of Los Angeles General Plan Framework Element

The City's General Plan Framework Element (the Framework Element), adopted in December 1996 and re-adopted in August 2001, contains policies and objectives that address public services and open space within the City (City of Los Angeles Department of City Planning, 2018a).

A. Infrastructure and Public Services Chapter

The goals, objectives and policies found in the Infrastructure and Public Services Chapter of the Framework Element address thirteen infrastructure and public service systems, many of which are interrelated, and all of which will help support the City's population and economy as it moves into the 21st century. The systems include; wastewater, stormwater, water, solid waste, police, fire, libraries, parks, power, schools, telecommunications, street lighting, and urban forest (City of Los Angeles Department of City Planning, 2018a). The Infrastructure and Public Services Chapter contains the following goals, objectives, and policies related to public services.

Fire Protection Services

Goal 9J: Every neighborhood has the necessary level of fire protection service, emergency medical service (EMS) and infrastructure.

- ***Objective 9.16:*** Monitor and forecast demand for existing and projected fire facilities and service.
    - ***Policy 9.16.1:*** Collect appropriate fire and population development statistics for the purpose of evaluating fire service needs based on existing and future conditions.
- ***Objective 9.17:*** Assure that all areas of the City have the highest level of fire protection and EMS, at the lowest possible cost, to meet existing and future demand.
    - ***Policy 9.17.4:*** Consider the Fire Department's concerns and, where feasible adhere to them, regarding the quality of the area's fire protection and EMS when developing general plan amendments and zone changes, or considering discretionary land use permits.
- ***Objective 9.18:*** Phase the development of new fire facilities with growth.
    - ***Policy 9.18.1:*** Engage in fire station development advance planning, acknowledging the amount of time needed to fund and construct these facilities.

<u>City of Los Angeles General Plan Safety Element</u>

The Safety Element, adopted on November 26, 1996, replaces the 1975 General Plan Safety Element and the 1979 Fire Protection and Prevention Element. The Safety Element contains policies related to the City's response to hazards and natural disasters. Policy 2.1.6 of the Safety Element requires the LAFD to maintain, enforce, and upgrade requirements, procedures, and standards to facilitate effective fire suppression including peak load water flow and building and fire code regulations. In addition, the LAFD is required to revise regulations or procedures to include the establishment of minimum standards for the location and expansion of fire facilities, based on flow, intensity, and type of land use, life hazards, occupancy, and degree of hazards, to provide adequate fire and EMS response.

<u>Northeast Los Angeles Community Plan</u>

The Northeast Los Angeles Community Plan seeks to achieve balance between the location, characteristics and phasing of public facility developments with proposed land use patterns (City of Los Angeles, 2016).

Goal 9: Adequate community protection through a comprehensive fire and life safety program.

- ***Objective 9-1: Ensure that fire facilities and protective services are sufficient for the existing and future population and land uses.***
    - ***Policy 9-1.2: Review adequacy of fire stations.***

4.11.a.2.2 Existing Conditions

Fire Protection Services

The Los Angeles Fire Department provides fire protection and emergency services to the Project Site. There are currently 106 fire stations in the City. The LAFD currently employs approximately 3,246 uniformed personnel and 353 support personnel. A total of 1,018 uniformed firefighters (including 270 serving as Firefighter/Paramedics) are always on duty. The department's standard response times are an average of approximately five minutes. On a daily basis, the LAFD responds to more than 1,112 emergency responses and the department's rescue ambulances transport more than 571 people to area hospitals. The LAFD has a mutual aid agreement with fire departments in adjacent counties, including the County of LA and cities. The LAFD has entered into both Mutual Aid and Automatic Aid Agreements with neighboring fire departments. Automatic Aid is an automatic exchange of agreed upon resources in the event of an emergency (LAFD, 2014, p. 2). In most cases, the LAFD is able to provide its own backup (from nearby stations) due to the size of the department and amount of resources available (LAFD, 2018a).

The Project Site is served by LAFD Station No. 47 located at 4574 Huntington Drive South, located approximately 0.25 mile southeast of the Project Site (Google Earth Pro, 2019). LAFD Station No. 47 is part of the LAFD Central Bureau (LAFD, 2018b). The current response time of Station No. 47 to the Project area (El Sereno) is five minutes and twelve seconds (LAFD, 2019). The Central Bureau encompasses Downtown Los Angeles and the surrounding communities. Deputy Chief Phillip T. Fligiel is the Central Bureau Commander, and manages the day-to-day operations of 22 fire stations and 645 personnel in Battalions 1, 2, and 11 (LAFD, 2018c).

Vehicular access to the Project Site, including emergency access, is provided via three driveways along Florizel Street, two driveways along Mercury Avenue, and one driveway along McKenzie Avenue. Review of Los Angeles County Disaster Routes Map for the City of Los Angeles (Los Angeles County Department of Public Works, 2013) shows that the Project Site is not accessed by a road designated as a disaster route. However, a portion of Huntington Drive, located within 1,000 feet southeast of the Project Site, is a designated disaster route (refer to **Section 4.14** of this draft EIR for details).

The Los Angeles Department of Water and Power (LADWP) manages the water supply for the City of Los Angeles. LADWP's goal is to ensure that the City's water quality and demand are met by available water supplies. The Project Site is developed with a public housing complex containing 100 multi-family units. Water to the Project Site is currently provided by the LADWP. Offsite mainline water system improvements may be necessary within the street right-of-way to provide an adequate water flow to the Project Site for water service and fire suppression needs. The Project would comply with applicable requirements of the LADWP and the LAFD such that the Project would provide adequate infrastructure and water flow to the Project Site.

The Project Site is characterized as urban developed with ornamental trees and shrubs throughout. Land uses surrounding the site include residential development to the south and east and natural open space, regional recreational park lands, and equestrian trails to the north and west. CalFire is legally mandated to periodically map Fire Hazard Severity Zones on State Responsibility Areas (SRAs), as well as recommend Very High Fire Hazard Severity Zones in Local Responsibility Areas (LRAs). The Project Site is located in an SRA area with a non-fire hazard designation (CalFire, 2007) and an LRA - Very High Fire Hazard Severity Zone (CalFire, 2012) (refer to **Section 4.14** of this draft EIR for details).

4.11.a.3 Project Impacts

4.11.a.3.1 Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G, the project would have a significant impact related to fire protection services if it would:

Threshold (a): ***Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services.***

4.11.a.3.2 Methodology

For the purpose of analyzing potential Project impacts on fire protection services and facilities, existing fire protection services and facilities in the vicinity of the Project Site were reviewed and identified. A discussion of existing fire protection services and facilities in the vicinity of the Project Site is provided in **Section 4.11.a.2.2** above.

In general, a project would be considered to have a significant impact on fire protection services if it requires the addition of a new fire station or expansion of existing fire protection facilities to accommodate the project. Increased demand for fire protection services and facilities and resulting potential impacts as a result of the Project were evaluated based on: 1) the estimated increase in population to be generated by the Project, and 2) input received from the Los Angeles Fire Department, via a response letter received in response to information request letter sent by UltraSystems (refer to **Appendix N1** for details).

Consultation with LAFD was conducted to determine the Project's effect on fire protection services. LAFD evaluates impacts related to fire protection services by taking into consideration a project's land use, needs related to fire protection services, project's adherence with recommended response distance and fire safety requirements and project design features related to fire safety (such as project size, project components, required fire flow, fire hydrant sizing, access, and use and storage of hazardous materials). Based on these factors, the LAFD determines whether the addition of a new fire station or expansion of existing fire protection facilities is needed to accommodate the Project.

4.11.a.3.3 Analysis of Project Impacts

Threshold (a): ***Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services?***

<u>Project Construction</u>

During Phase I of Project construction, fewer persons would be living at the Project Site, compared to existing conditions, which would incrementally decrease the demand on fire services. Once Phase I

of Project construction is complete, residents would move into the Phase I construction, which would be built in compliance with current City of Los Angeles fire codes.

Construction activities could potentially increase the risk of fires by exposing combustible building materials such as wood, coverings and coatings to exposed electrical lines, sparks from construction equipment, and lighted cigarettes. As discussed in **Section 4.11.a.2** above, the Occupational Safety and Health Administration enforces standards for safe and healthful working conditions for workers during construction. The required safety and health regulations for construction sites are included in the Code of Federal Regulations (CFR), Title 29, Part 1926. In accordance with these requirements, construction workers would be trained in emergency response and fire safety operations including the monitoring and management of life safety systems. Additionally, in accordance with the safety requirements related to fire protection and prevention for construction sites listed in CFR Part 1926, Subpart F, the project would include provision of adequate fire suppression and fire-fighting equipment on the construction site, sufficient water supply, and keep storage sites free from accumulation of unnecessary combustible materials. Project construction would occur in compliance with applicable federal, state and local requirements for handling, use, storage and disposal of hazardous materials. With compliance with applicable regulatory requirements, impacts related to increased fire risk during Project construction would be less than significant.

Project construction activities and construction staging areas would be contained within the boundary of the Project Site. Therefore, the Project would not have a significant impact on the provision of fire protection services in the vicinity of the Project Site, during the construction phase.

Based on the discussion above, the Project would have less than significant impacts on fire protection services during Project construction.

<u>Project Operation</u>

The Project is expected to result in an increase of 85 housing units and 435 more residents, compared to current (January 2019) conditions which could increase the demand for LAFD services.

The LAFD considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed. Pursuant to § 57.09.07A of the LAMC, the maximum response distance between residential land uses and a LAFD fire station that houses an engine or truck company is 1.5 miles. If this distance is exceeded, all structures located in the applicable residential area would be required to install automatic fire sprinkler systems. With such systems installed, fire protection would be considered adequate even if the project is located beyond the maximum response distance.

The Project Site is served by Station No. 47 located approximately 0.25 mile south of the Project Site. The current response time of Station No. 47 to the Project area (El Sereno) is five minutes and twelve seconds (LAFD, 2019). Based on the response distance criteria specified in LAMC 57.09.07A and the relatively short distance from Fire Station No. 47 to the Project Site, fire protection response is considered adequate to serve the Project Site. Additionally, the Project would be constructed with automatic sprinklers, where required by code.

Furthermore, the adequacy of existing water pressure and water availability in the Project area will be verified by the LAFD during the plan check review process. Compliance with the Los Angeles Building Code and LAFD standards is mandatory and routinely conditioned upon projects when they are approved. The LAFD will review the development plans in order to ascertain the nature and

extent of any additional requirements. The Project Site plan would also be reviewed by the Los Angeles Fire Department to ensure that the Project complies with all emergency access and sight line requirements. The Project, once operational, would be periodically inspected by the Fire Department**. Therefore, the Project would have less than significant impacts regarding fire protection, with compliance with applicable codes and recommendations of the LAFD.**

4.11.a.4 Cumulative Impacts

As discussed in **Section 3.0**, Environmental Setting, of this draft EIR, there are seven related projects that were considered in the cumulative analysis for the proposed Project. The related projects generally consist of infill development including apartments, single-family homes, mixed use, retail, office and school uses (KOA, 2019, Attachment F). Similar to the proposed Project, the cumulative projects would be required to comply with relevant land use policies and regulations and would be subject to CEQA review. As discussed above in **Section 4.11.a.3**, the Project would be consistent with applicable federal, state and local standards and regulations related to fire protection services and facilities in the City of Los Angeles.

Implementation of the proposed Project along with the cumulative projects considered for the purpose of this analysis would not have cumulatively significant impacts related to fire protection services and facilities. **Therefore, cumulative impacts related to fire protection services would be less than significant and would not be cumulatively considerable.**

4.11.a.5 Mitigation Measures

As discussed above in Threshold (a), Project-level and cumulative impacts with regards to fire protection services during Project construction and operation would be less than significant. Therefore, no mitigation measures are required.

4.11.a.6 Level of Significance after Mitigation

Project-level and cumulative impacts related to fire protection services and other public facilities would be less than significant without mitigation.

4.11.b Police Protection

4.11.b.1 Introduction

This section of the draft EIR discusses the Project's impacts on police protection and law enforcement services. This section describes the existing police protection services and facilities in Project area and analyzes: 1) if the existing police protection services and facilities would be sufficient to accommodate the Project, 2) the impacts of the Project on existing police protection services and facilities, and 3) the Project's consistency with the applicable regulatory requirements related to police protection services.

4.11.b.2 Environmental Setting

4.11.b.2.1 Regulatory Framework

Federal

There are no federal regulations pertaining to police protection services.

State

California Constitution Article XIII, § 35

California Constitution Article XIII, § 35 (a)(2) states: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." Article XIII, § 35 of the California Constitution was adopted under Proposition 172, which directed the proceeds of a 0.50% sales tax to be used exclusively for public safety services. Therefore, lead agencies are required use Proposition 172 to supplement local funds and ensure that public safety services including fire protection, emergency medical services and other public safety services are provided.

Local

Los Angeles City Charter and Municipal Code

Regulations regarding police protection and law enforcement services are included in the City of Los Angeles Charter, Article V, § 570 and Chapter V, Article 2 of the LAMC. The City gives Los Angeles Police Department (LAPD) officers the responsibility to enforce provisions of the City Charter, City ordinances and state and federal law, and act as peace officers to protect lives and property in case of a disaster.

City of Los Angeles General Plan Framework Element

The City's General Plan Framework Element (the Framework Element), adopted in December 1996 and re-adopted in August 2001, contains policies and objectives that address public services and open space within the City (City of Los Angeles Department of City Planning, 2018a).

B. Infrastructure and Public Services Chapter

The goals, objectives and policies found in the Infrastructure and Public Services Chapter of the Framework Element address thirteen infrastructure and public service systems, many of which are interrelated, and all of which will help support the City's population and economy as it moves into the 21st century. The systems include; wastewater, stormwater, water, solid waste, police, fire, libraries, parks, power, schools, telecommunications, street lighting, and urban forest (City of Los Angeles Department of City Planning, 2018a). The Infrastructure and Public Services Chapter contains the following goals, objectives, and policies related to police protection services.

Police Protection Services

Goal 9I: Every neighborhood in the City has the necessary police services, facilities, equipment, and manpower required to provide for the public safety needs of that neighborhood.

- ***Objective 9.13:*** Monitor and forecast demand for existing and projected police service and facilities.
    - ***Policy 9.13.1:*** Monitor and report police statistics, as appropriate, and population projections for the purpose of evaluating police service based on existing and future needs.
- ***Objective 9.14:*** Protect the public and provide adequate police services, facilities, equipment and personnel to meet existing and future needs.
    - ***Policy 9.14.1:*** Work with the Police Department to maintain standards for the appropriate number of sworn police officers to serve the needs of residents, businesses, and industries.

<u>Northeast Los Angeles Community Plan</u>

The Northeast Los Angeles Community Plan seeks to achieve balance between the location, characteristics and phasing of public facility developments with proposed land use patterns (City of Los Angeles, 2016).

Goal 8: Adequate police facilities and services to provide for the public safety needs of the community.

- ***Objective 8-1:*** To provide adequate police facilities and personnel to correspond with population and service demands.
    - ***Policy 8-1.1:*** Coordinate with Police Department as part of the review of significant development projects and General Plan Amendments affecting land use to determine the impact on service demand.
    - ***Policy 8-1.3:*** Encourage design of building and facilities in accordance with principles that minimize opportunities for crime and enhance personal safety.

4.11.b.2.2 Existing Conditions

Police Protection Services

Los Angeles Police Department provides primary police protection services in the City of Los Angeles, an area of approximately 473 square miles with a population of approximately 4,007,905 people (LAPD, 2018a).

The Project Site is located in the Central Bureau, Hollenbeck Division, 402 RD (LAPD, 2018b). Operations-Central Bureau oversees operations in the following Areas; Central, Hollenbeck, Newton, Northeast and Rampart, as well as the Central Traffic Division. Central Bureau has a population of roughly 842,700 people, encompasses 65 square miles, and includes such diverse communities as the downtown business district, Dodger Stadium, Eagle Rock, the Fashion District, Griffith Park, MacArthur Park, Staples Center, and L.A. Live. It borders Burbank, Glendale, Pasadena, South Pasadena, Alhambra, East Los Angeles, Vernon, and Huntington Park. Central Bureau's population is the most ethnically and culturally diverse in the City (LAPD, 2018c).

The Hollenbeck Division is located east of downtown Los Angeles, has a population of roughly 200,000 people and is 15.2 square miles in size. It encompasses the communities of El Sereno, Lincoln Heights and Boyle Heights. The service boundaries for Hollenbeck Area are as follows; York Boulevard, Pasadena Freeway to the north, Los Angeles City Boundary, Valley Boulevard to the south, Los Angeles City Boundary, Westminster Avenue to the east, and Los Angeles River to the west.

The Hollenbeck Community Police Station is located at 2111 East 1st Street (Davenport, 2018), approximately 4 miles to the southwest of the Project Site (Google Earth Pro, 2018). It has approximately 350 sworn personnel and 30 civilian support staff assigned (Davenport, 2018).

Table 4.11.b-1, lists the 2018 population, number of sworn officers, and officer/resident ratio for the Hollenbeck Community Police Station and for the City of Los Angeles.

Table 4.11.b-1
2018 OVERALL LAPD AND HOLLENBECK DIVISION STATISTICS

2018 Overall LAPD and Hollenbeck Division Statistics				
Service Area	**Square Miles**	**Population**	**Sworn Officers**	**Officer/Resident Ratio**
City[1]	473	4,007,905	10,029	1 / 400
Hollenbeck Division[2]	15.2	200,000	350	1 / 571

[1]Source: LAPD, 2018a.
[2]Source: Davenport, 2018

Pursuant to § 120.40 of the Police Department Manual, emergency calls shall be answered immediately, but in a manner that will enable the unit to reach the scene as quickly and safely as possible. The Hollenbeck Division's average response times for emergency calls during 2017 was 4.5 minutes and for non-emergency calls during 2016 was 23.2 minutes (Davenport, 2018).

4.11.b.3 Project Impacts

4.11.b.3.1 Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G, the project would have a significant impact related to public services if it would:

Threshold (a): ***Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for Police protection services.***

4.11.b.3.2 Methodology

According to City of Los Angeles CEQA Thresholds Guide, the demand for police protection services is related to the size and characteristics of the community, population, the geographic area served, and the number and type of calls for service. Therefore, for the purpose of analyzing potential Project impacts on police services and facilities, existing police services in the vicinity of the Project Site were reviewed and identified. A discussion of existing police protection services and facilities in the vicinity of the Project Site is provided in **Section 4.11.b.2** above. Increased demand for police protection services and resulting potential impacts as a result of the Project were evaluated based on; 1) the estimated increase in population to be generated by the Project, and 2) input received from the LAPD via a response letter received in response to the information request letter sent by UltraSystems (refer to **Appendix N2** for details).

Consultation with LAPD was conducted to determine the Project's effect on police protection services and determine whether the addition of a new police station or expansion of existing protection facilities would be required to accommodate the proposed Project.

4.11.b.3.3 Analysis of Project Impacts

Threshold (a): ***Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services?***

<u>Project Construction</u>

The Project Site is located in the Central Bureau, Hollenbeck Division, 402 RD (LAPD, 2018b). Project construction would not generate a permanent population on the Project Site that would substantially increase the police service population in the Hollenbeck Division area. However, construction sites, if not properly secured, have the potential to generate a temporary increase in the demand for police protection services. There is an increased possibility for trespassing, vandalism, and unattractive nuisances during the construction phase of the Project. Security measures such as temporary fencing, lighting and locked entry, implemented during the construction phase are generally sufficient to feasibly deter activities related to theft and vandalism on construction sites.

Project construction activities and construction staging areas would be contained within the boundary of the Project Site. Additionally, emergency vehicles normally have a variety of options for avoiding traffic, such as the use of sirens to clear a path of travel or for driving in lanes of opposing traffic. Therefore, the Project would not have a significant impact on the police response times or the provision of police protection services in the vicinity of the Project Site, during the construction phase.

Implementation of mitigation measure PS-1 (provided in Section 4.11.b.5 below) would reduce temporary construction impacts on police protection services to a less than significant level.

Project Operation

As described previously, the Project Site is served by the Hollenbeck Community Police Station. The officer-to-population ratio is of approximately one officer to 571 residents. The response to the information request letter sent to the City of Los Angeles Police Department (refer to **Appendix N2** of this document) indicates that the Project "could have a minor impact on police services in the Hollenbeck Area" (Davenport, 2018). The Project is expected to result in a net increase of 435 residents, compared to existing conditions. The Project would increase the Hollenbeck Division police service population to a population of roughly 200,435 and would result in an officer-to-population service ratio of approximately one officer to 573 residents. Therefore, the Project will not result in a substantial increase in the population and housing of the Project area, nor is it expected to significantly affect the existing service capacity of the LAPD. The increase in residences, visitors, employee and traffic in the area would not likely significantly increase the need for additional law enforcement services. Additionally, as described in the Project description section of this document, the Project would include exterior lighting that will be located on the buildings in addition to street, sidewalk and pathway lighting located across the entire site. The site will have security features including; cameras, controlled access to midrise buildings, and potentially controlled access to some of the parking areas. Ground rules will be established by the property management company (Related Management Company).

In response to public comments, implementation of mitigation measure PS-2 (provided in Section 4.11.b.5 below) would enhance the safety of the Project Site and would result in less than significant impacts on police protection and law enforcement services.

4.11.b.4 Cumulative Impacts

As discussed in **Section 3.0**, Environmental Setting, of this draft EIR, there are seven related projects that were considered in the cumulative analysis for the proposed Project. The related projects generally consist of infill development including apartments, single-family homes, mixed use, retail, office and school uses (KOA, 2019, Attachment F). Similar to the proposed Project, the cumulative projects would be required to comply with relevant federal, state and local standards, policies and regulations and would be subject to CEQA review. The Project would be consistent with applicable standards and regulations that regulate the provision of police protection services and facilities in the City of Los Angeles.

In response to public comments regarding safety, security and crime prevention, implementation of mitigation measures PS-1 and PS-2 (provided in **Section 4.11.b.5** below) would enhance the safety of the Project Site and would result in less than significant impacts on police protection and law enforcement services.

Implementation of the proposed Project along with the cumulative projects considered for the purpose of this analysis would not have cumulatively significant impacts related to police protection services. **Therefore, cumulative impacts related to police services would be less than significant and would not be cumulatively considerable.**

4.11.b.5 Mitigation Measures

As discussed above in Threshold (a), there is an increased possibility for trespassing, vandalism, and unattractive nuisances during the construction phase of the Project. Therefore, the following measures are provided to reduce potential impacts on police protection and law enforcement services and enhance the safety of the Project Site during Project construction and operation.

PS-1 **Public Services (Police – Demolition/Construction Sites)**
Temporary construction fencing shall be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area.

PS-2 **Public Services (Police)**
Project plans shall incorporate the "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", published by the LAPD relative to security, semi-public and private spaces, which may include but not be limited to, access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high foot-traffic areas. These measures shall be approved by the City of Los Angeles Police Department prior to the issuance of building permits.

4.11.b.6 Level of Significance after Mitigation

With implementation of mitigation measures **PS-1** and **PS-2**, there would be less than significant impacts on law enforcement services during both the construction and operational phases of the Project.

4.11.c Schools

4.11.c.1 Introduction

This section of the draft EIR discusses the project's impacts on school facilities. This section describes the existing schools/educational facilities in project the area and analyzes: 1) if the existing school facilities would be sufficient to accommodate the project, 2) the impacts of the project on existing schools, and 3) project's consistency with the applicable regulatory requirements related to schools.

4.11.c.2 Environmental Setting

4.11.c.2.1 Regulatory Framework

Federal

There are no applicable federal regulations pertaining to school services because public education is regulated at the state and local levels. However, federal funds are used for specialized school-related programs, such as special education and meals for students.

State

California Education Code Section 17620(a)(1)

Government Code § 65995(h) states in part: "The payment or satisfaction of a fee …specified in § 65995 … are hereby deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property … on the provision of adequate school facilities."

Senate Bill 50/Proposition 1A

Senate Bill (SB) 50, the Leroy F. Greene School Facilities Act of 1998, was signed into law on August 27, 1998. SB 50 provides grant funding to school districts for acquisition of school sites, construction of new facilities, or modernization of existing facilities. Grants are funded through a $9.2 billion state bond measure, Proposition 1A, that was approved by voters during the November 3, 1998 election. An additional $12.3 million in funding was provided by Proposition 55 that was passed in March 2004. Under SB 50, construction grants are provided at a 50:50 state and local ratio, while modernization grants are provided on a 60:40 ratio are shared between the State and local school district. School districts that are unable to meet any share of the local match requirement may be eligible for additional state funding if they satisfy financial hardship (State of California, 2007a).

In addition, SB 50 allows governing boards of school districts to establish fees to offset costs associated with school facilities made necessary by new construction. Pursuant to SB 50, the LAUSD collects development fees for new construction within its district boundaries. Currently, LAUSD collects new school construction facility fee at a rate of $3.79 per square foot of new residential construction, $0.61 per square foot of commercial or industrial construction, $0.28 per square foot of self-storage structure, and $0.39 per square foot of parking structures (SchoolWorks Inc, 2018). LAUSD new school construction facility fees must be paid prior to the issuance of building permits. Pursuant to California Government Code § 65995, the payment of these fees by a developer serves to fully mitigate all potential project impacts on school facilities to less than significant levels.

Property Tax

Approximately 32% of funding for California public schools, including the LAUSD, comes from property taxes and other local sources. While property tax is assessed at a local level, it is the State which allocates the tax revenue to each district according to average daily attendance rates (Public Policy Institute of California, 2019).

Regional

Approximately 58% of funding for California public schools, including the LAUSD, comes from the state. On a regional level, the Los Angeles City Board of Education is the governing body of the LAUSD, and board members make all decisions on matters related to public education in the City of Los Angeles. The Board is comprised of individuals who have been elected from the general area, and all decisions made must be in compliance with State statutes including budget decisions and funding allocation for facility construction and maintenance (LAUSD, 2018).

Local

Los Angeles Unified School District (LAUSD)

The LAUSD is the second largest school district in the nation, and serves over 600,000 K-12 students across the City of Los Angeles, in addition to 31 municipalities and unincorporated regions of Southern California. The State is responsible for the funding and organization of school districts throughout California, including the LAUSD. Public schools operate under the policy direction of the Los Angeles Board of Education, as well as by local propositions which directly impact the funding of facility construction and maintenance (LAUSD, 2019a).

Los Angeles Municipal Code

The Los Angeles Municipal Code contains policies and objectives that relate to public school organization and operation within the city. Article VIII, Board of Education, specifies requirements for LAUSD board member election processes, redistricting, term limits, and compensation. Sec. 805 states that the Board of Education shall control and manage LAUSD public schools in accordance with the Constitution and State laws.

City of Los Angeles General Plan Framework Element

The City's General Plan Framework Element (the Framework Element), adopted in December 1996 and readopted in August 2001, contains policies and objectives that address public services and open space within the City (City of Los Angeles Department of City Planning, 2018a).

A. Infrastructure and Public Services Chapter

The goals, objectives and policies found in the Infrastructure and Public Services Chapter of the Framework Element address thirteen infrastructure and public service systems, many of which are interrelated, and all of which will help support the City's population and economy as it moves into the 21st century. The systems include: wastewater, stormwater, water, solid waste, police, fire, libraries, parks, power, schools, telecommunications, street lighting, and urban forest (City of Los Angeles Department of City Planning, 2018a). The Infrastructure and

Public Services Chapter contains the following goals, objectives, and policies related to schools.

Schools

Goal 9L: Sufficient and accessible parkland and recreation opportunities in every neighborhood of the City, which gives all residents the opportunity to enjoy green spaces, athletic activities, social activities, and passive recreation.

- Objective 9.23: Complete all currently programmed parks and recreation capital improvements by the year 2010, contingent on available funding.
    - Policy 9.23.3: Establish joint-use agreements with the Los Angeles Unified School District and other public and private entities which could contribute to the availability of recreation opportunities.

Goal 9N: Public schools that provide a quality education for all of the City's children, including those with special needs, and adequate school facilities to serve every neighborhood in the City so that students have an opportunity to attend school in their neighborhoods.

- Objective 9.31: Work constructively with the Los Angeles Unified School District to monitor and forecast school service demand based upon actual and predicted growth.
    - Policy 9.31.1: Participate in the development of, and share demographic information about, population estimates.
- Objective 9.32*:* Work constructively with LAUSD to promote the siting and construction of adequate school facilities phased with growth.
    - Policy 9.32.1: Work with the Los Angeles Unified School District to ensure that school facilities and programs are expanded commensurate with the City's population growth and development.
    - Policy 9.32.2: Explore creative alternatives for providing new school sites in the City, where appropriate.
    - Policy 9.32.3: Work with LAUSD to explore incentives and funding mechanisms to provide school facilities in areas where there is a deficiency in classroom seats.
- Objective 9.33: Maximize the use of local schools for community use and local open space and parks for school use.
    - Policy 9.33.1: Encourage a program of decision-making at the local school level to provide access to school facilities by neighborhood organizations
    - Policy 9.33.2: Develop a strategy to site community facilities (libraries, parks, schools, and auditoriums) together.

Northeast Los Angeles Community Plan

The Northeast Los Angeles Community Plan seeks to achieve balance between the location, characteristics and phasing of public facility developments with proposed land use patterns (City of Los Angeles, 2016).

> **Goal 1:** A safe, secure, and attractive residential environment for all economic, age, and ethnic segments of the community.

- Objective 1-2: To allocate land for new housing to accommodate a growth of population that is consistent with and promotes the health, safety, welfare, convenience, and pleasant environment of those who live and work in the community based on adequate infrastructure and government services, especially schools.

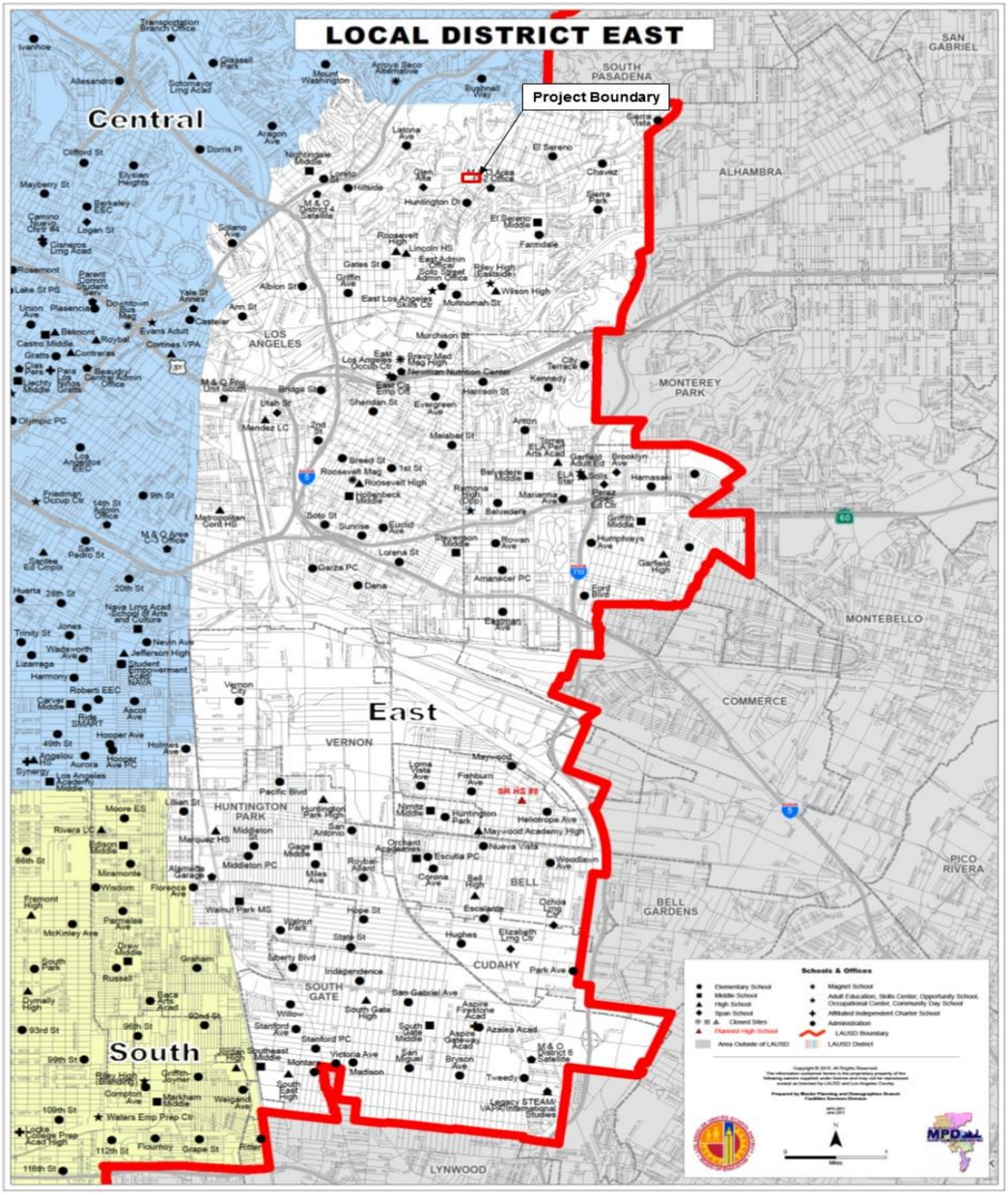
4.11.c.3 Existing Conditions

Los Angeles Unified School District

The project site is located within boundaries of the LAUSD. The LAUSD enrolls more than 600,000 students in kindergarten through 12th grade. The LAUSD serves an area of approximately 710 square miles that includes the City of Los Angeles, all or portions of 26 additional cities, and several unincorporated areas of Los Angeles County (LAUSD, Fingertip Facts 2018-2019). Approximately 4.8 million people live within the district's boundaries. During the current 2018-2019 school year, LAUSD is providing kindergarten through high school (Grades K-12) education to approximately 694,096 students enrolled throughout 1,322 schools and centers. These include 19 primary school centers, 449 elementary schools, 79 middle schools, 94 senior high schools, 54 option schools, 51 magnet schools, 24 multi-level schools, 13 special education schools, two home/hospital centers, 203 magnet centers on regular campuses (Grades K-12), 216 independent charter schools, and 118 other schools and centers (LAUSD, Fingertip Facts 2018-2019). The LAUSD is divided into six local districts, and the Project Site is located in the East Local District, as shown in **Figure 4.11.c-1** below (LAUSD, 2019).

Major statewide funding sources in addition to Senate Bill 50 and Proposition 55, discussed above, include proposition 47. Proposition 47, the Kindergarten-University Public Education Facilities Bond Act of 2002, was approved by voters in November 2002. Proposition 47 provided an additional $11.4 billion in funding for K-12 school facilities throughout the state. The initiative aimed to improve quality of facilities and reduce overcrowding in schools (State of California, 2007b). Additionally, LAUSD relies upon funds from the New School Construction Program, which is a multi-year capital improvement program. The program aims to build new schools in areas with the greatest overcrowding, eliminate involuntary busing and multi-track calendars, and implement Full-Day Kindergarten. As of June 2015, approximately 600 new construction projects providing over 170,000 new seats had been completed. Additionally, the next phase of the project, will continue with modernization projects to provide upgraded facilities and help improve the learning environment for all students in the LAUSD area (LAUSD Facilities Services Division, Facilities Services Division Strategic Execution Plan ,2017).

Figure 4.11.c-1
LAUSD EAST LOCAL DISTRICT



Disclaimer: Illustration provided by the Los Angeles Unified School District who has indicated that the information is true and correct. No other warranties are expressed or implied.

Sources: Los Angeles Unified School District, May 2019

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Rose Hill Courts Redevelopment
LAUSD East Local District

Public Schools

Figure 4.11.c-2 shows the public schools near the Project Site. Per the information provided by the LAUSD, the following schools serve the Project Site: Woodrow Wilson Senior High, Abraham Lincoln Senior High, and Glen Alta Elementary (which serves grades K-8) (LAUSD, 2018b and **Appendix N5** of this document).

Glen Alta Elementary had an enrollment of 168 students during the 2018-2019 school year, Abraham Lincoln Senior High School had an enrollment of 1,066 students during the 2018-2019 school year, and Woodrow Wilson Senior High School had an enrollment of 1,424 students during the 2018-2019 school year (LAUSD, 2018c).

Current Enrollment Capacity

Table 4.11.c-1 below shows the academic year capacity, enrollment, and seating shortages/overages for each of these schools during the 2017-2018 school year (which is the most current data available from LAUSD on operating capacities and enrollments). All data presented below takes into account portable classrooms onsite, additions being built onto existing schools, student permits and transfers, programs serving choice areas, and any other operational activities or educational programming that affect the capacities and enrollments of the schools. (Letter from Rena Perez, Director, LAUSD, Facilities Services Division, dated August 1, 2019). See **Appendix N5** of this document. As detailed in the notes provided in the response letter from LAUSD, no new school construction is planned. The calculation of school operating capacity is the maximum number of students the school can serve with the school's classroom utilization. This excludes capacity allocated to charter co-locations, and this includes capacity for magnet programs. Resident enrollment is defined as the total number of students living in the school's attendance area who are eligible to attend the school at the start of the reported school year, plus students enrolled at any onsite magnet centers. Actual enrollment is defined as the number of students actually attending the school at the start of the reported school year, including magnet students.

Table 4.11.c-1
2017-2018 ENROLLMENT AND CAPACITY OF LAUSD SCHOOLS THAT SERVE THE PROJECT SITE

School	Current Capacity[2]	Resident Enrollment[3]	Actual Enrollment[4]	Current Seating Overage (i.e. Shortage)[5]	Overcrowded Now[6]
Glen Alta Elementary	240	283	179	(43)	Yes
School Choice Area Totals[1]	3,215	3,888	2,599	(673)	Yes
Abraham Lincoln Senior High School[1]	1,723	--	1,096	--	--
Woodrow Wilson Senior High School[2]	1,492	--	795	--	--

[1] Schools and programs that are a part of a "school choice area" pull enrollments from the area school(s) that have resident attendance boundaries. Seating and overage/shortage and overcrowding is calculated and reported for the

school choice area as a whole; capacity and actual enrollment is reported for each individual school and/or program listed.

[2] School's operating capacity. The maximum number of students the school can serve with the school's classroom utilization. Excludes capacity allocated to charter colocations. Includes capacity for magnet programs.

[3] The total number of students living in the school's attendance area and who are eligible to attend the school at the start of the reported school year, plus students enrolled at any onsite magnet centers.

[4] The number of students actually attending the school at the start of the reported school year, including magnet students.

[5] Reported school year seating overage or (shortage): equal to (capacity) - (resident enrollment).

[6] Reported school year overcrowding status of school. The school is overcrowded if any of these conditions exist:
-There is a seating shortage.
-There is a seating overage of less than or equal to a margin of 20 seats.

Table Source: Response to Information Request Letter (**Appendix N5** of this document)

The LAUSD considers a school to be overcrowded if any of the following conditions exist: (1) there is a seating shortage, or (2) there is a seating overage of less than or equal to a margin of 20 seats. As shown in **Table 4.11.c-1**, the schools serving the project site are currently overcrowded.

Future Enrollment Capacity

The LAUSD also projects the future capacity of its schools for the next five years.[72] **Table 4.11.c-2** below shows the LAUSD's projected capacity at each of the schools serving the Project Site and vicinity, which are further discussed below.

Glen Alta Elementary School

Refer to **Appendix N5**, which provides the following information: The projected enrollment for Glen Alta Elementary School is 260 students, which would result in a projected overage of 20 seats. Therefore, overcrowding is anticipated in the future for this school.

Abraham Lincoln High School and Woodrow Wilson Senior High School

Projected enrollment, projected seating, and projected overcrowding information is not provided separately for either Abraham Lincoln High School or Woodrow Wilson Senior High School. Instead, LAUSD provided information in the form of school choice area totals for the Northeast High School Zone of Choice. Schools and programs that are part of a "School Choice Area" pull enrollments from the area school(s) that have resident attendance boundaries. Seating average/shortage and overcrowding is calculated and reported for the school choice area as a whole. As detailed in **Appendix N5** and shown in **Table 4.11.c-2** below, no overcrowding is projected in the future for Woodrow Wilson High School and Abraham Lincoln High School, which are within the Northeast High School Zone of choice for LAUSD.

72 As detailed in **Section 2.0**, Project Description, of this document, project construction is anticipated to be completed in 2024. LAUSD projects future enrollment capacity in five-year increments based on the most recent school year for which data is available, which is currently for the 2017-2018 school year. Therefore, projected future enrollment and capacity data analyzed in this section is for the 2022-2023 school year.

Figure 4.11.c-2
SCHOOLS

Path: J:\Projects\6022A_HACLA_Rose_Hill\MXDs\IS_MND\6022A_HACLA_4_8_Schools_2019_05_29.mxd
Service Layer Credits: Esri, HERE, Garmin, (c) OpenStreetMap contributors, Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community, Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, © OpenStreetMap contributors, and the GIS User Community, Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community; LA County Assessor, 2015-2016; LA County, 2015; Esri, 2015; UltraSystems Environmental, Inc., 2018

May 29, 2019

Scale 1:13,200

N

0 550 1,100 Feet

0 175 350 Meters

Legend

- School Location
- Project Boundary
- Education Facility

Rose Hill Courts Redevelopment

Schools

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Table 4.11.c-2
PROJECTED 2022-2023 ENROLLMENT CAPACITY OF LAUSD SCHOOLS THAT SERVE THE PROJECT SITE

School	Projected Enrollment [a]	Projected Seating Overage/ (Shortage)[b]	Overcrowding Projected in Future?[c]
Glen Alta Elementary	260	(20)	Yes
School Choice Area Totals[1]	2,971	244	No
Abraham Lincoln Senior High School	--	--	--
Woodrow Wilson Senior High School	--	--	--

Notes:
[a] Projected 5-year total number of students living in the school's attendance area and who are eligible to attend the school as of the start of the school year. Includes magnet students.
[b] Projected seating overage or (shortage): equal to (capacity) - (projected enrollment).
[c] Projected overcrowding status of school. The school will be considered overcrowded in the future if any of these conditions exist:
-There is a seating shortage in the future.
-There is a seating overage of less than or equal to a margin of 20 seats in the future.
[1] Schools and programs that are a part of a "school choice area" pull enrollments from the area school(s) that have resident attendance boundaries. Seating and overage/shortage and overcrowding is calculated and reported for the school choice area as a whole; capacity and actual enrollment is reported for each individual school and/or program listed.

Open Enrollment Policy

The LAUSD Open Enrollment Policy allows parents to apply for designated open enrollment seats at specific campuses with available seats. The list of participating schools may change from year to year, and is announced in the spring.

Charter Schools

The LAUSD is the largest district charter school authorizer in the nation with 224 independent and 53 affiliated charter schools. Charter schools within the LAUSD currently serve over 138,000 K-12 students. Charter schools are open to any student residing within the State of California (LAUSD, 2019b).

Magnet Schools

The LAUSD contains 292 magnet programs throughout the district that offer theme-based instructional opportunities to K-12 students. All students living with the LAUSD boundaries are eligible to apply, and selections will be based on the Magnet Priority Point System. Points are assigned based on 5 criteria: Matriculation; Waiting List; Predominantly Hispanic, Black, Asian and Other Non-Anglo Schools; Overcrowded; and Sibling (LAUSD, 2019c).

Pilot Schools

Pilot schools within LAUSD are a network of public schools that have autonomy over budgeting, staffing, governance, curriculum, assessment, and school calendar. During the 2018-2019 school

year, the LAUSD had 32 pilot high schools, four pilot middle schools, six pilot elementary schools, and four pilot span schools (LAUSD, 2019d).

Proposed New Public Schools

There are no proposed new LAUSD public schools in the project vicinity (LAUSD Facilities Services Division, 2019). The cumulative project located at 2520 N Eastern Avenue proposes a new elementary school that would serve 530 students.

Private Schools in the Project Vicinity

There are a number of private schools within the project vicinity, which are further described below.

- Our Lady of Guadalupe, Rose Hill School is located just east of the project site (Google Earth, 2019) and no new construction of schools is planned (**Appendix N5**). This school is located at 4522 Browne Avenue, approximately 0.1 mile east of the project site. Our Lady of Guadalupe is a TK-8 Catholic school with curriculum based on the Archdiocese of Los Angeles and the California State Standards for seven core subjects. The school is accredited by the Western Association of Schools and Colleges (WASC) and the Western Catholic Educational Association (WCEA) (Our Lady of Guadalupe, Rose Hills, 2018).

- Divine Saviour Catholic School is located at 624 Cypress Avenue, approximately four miles from the project site. Divine Saviour is a TK-8 Catholic school with curriculum based on Common Core Standards for core subjects, as well as Assessment of Catholic Religious Education (ACRE) Domains. The school is accredited by the Western Association of Schools and Colleges (WASC) and the Western Catholic Educational Association (WCEA) (Divine Saviour School, 2019).

- All Saints School is located at 3420 Portola Avenue, approximately two miles from the project site. All Saints is a K-8 coeducational Catholic elementary school. Schoolwide learning expectations include developing students to become committed Catholic Christians and engaged learners. The school is accredited by the Western Association of Schools and Colleges (WASC) and the Western Catholic Educational Association (WCEA) (All Saints School, 2019).

- Sacred Heart High School is located at 2111 Griffin Avenue, approximately two miles from the project site. Sacred Heart is an all-girls Catholic, college preparatory school, with approximately 225 students and graduating classes of 60-65 students. Sacred Heart currently offers ten Advanced Placement (AP) courses that are accredited by the College Board (Sacred Heart College Preparatory, 2019).

4.11.c.4 Project Impacts

4.11.c.4.1 Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G, the project would have a significant impact related to public services if it would:

Threshold (a): **Result in substantial adverse physical impacts associated with the provision *of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, construction of which could***

cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for Schools.

For this analysis Appendix G Guidelines are relied upon.

4.11.c.4.2 Methodology

For the purpose of analyzing potential project impacts on public services and facilities, existing public services and facilities in the vicinity of the project site were reviewed and identified. A discussion of existing schools in the vicinity of the project site is provided above. Increased demand for public services and facilities and resulting potential impacts as a result of the project were evaluated based on: 1) the estimated increase in population to be generated by the project, and 2) information from the Los Angeles Unified School District and the California Department of Education.

4.11.c.4.3 Analysis of Project Impacts

Threshold (a): ***Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools?***

Construction

The Project would involve the development of 185 multi-family residential units. Project construction would result in temporary jobs for construction employees. However, due to the temporary nature of construction jobs and the anticipation that construction workers would not likely relocate their households due to construction job opportunities presented by the Project, construction employment generated by the Project would not result in an increase in the resident population or corresponding demand for schools in the project area. Impacts on school facilities during Project construction would be less than significant.

Operation

The Project proposes development of new multi-family residential units. As shown in **Table 4.11.c-3** below, using the applicable LAUSD student generation rates for multiple family dwelling units, the Project is estimated to generate approximately 78 new students consisting of 42 elementary school students, 12 middle school students, and 24 high school students.

Table 4.11.c-3
ESTIMATED NUMBER OF STUDENTS GENERATED BY THE PROJECT

Land Use	Number of Units	Students Generated [b, c]		
		Elementary (K-6)	Middle School (7-8)	High School (8-12)
Total Students Generated by the Proposed Project (Multi-Family Residential)	185 du	42	12	24

Existing Multi-Family Residential (to be removed)[a]	91 du	21	6	12
Net New Student Generation		**21**	**6**	**12**

Notes:
du = dwelling units
a Note that only 91 of the 100 units currently on site are occupied, thus the existing number of students generated is based on 91 units.
b Based on student generation factors in the 2018 Developer Fee Justification Study for the Los Angeles School District (Schoolworks, Inc., 2018, Table 3 on p. 5). Student generation factors are:
TK-6= 0.2269
7-8= 0.0611
9-12= 0.1296
c Numbers may not add up precisely, due to rounding.
Source: UltraSytems, 2019.

When accounting for the removal of the existing on-site apartment units, the Project would result in a net increase of approximately 39 students consisting of 21 elementary school students, six middle school students,[73] and 12 high school students.

The number of Project-generated students who could attend LAUSD schools serving the Project Site would likely be less than the above estimate because this analysis does not include LAUSD options that allow students generated by the Proposed Project to enroll at other LAUSD schools located away from their home attendance area, or students who may enroll in private schools or participate in home-schooling. Additionally, this analysis does not account for Project residents who may already reside in the school attendance boundaries and would move to the Project Site. Students generated by the proposed project have additional enrollment options through LAUSD, including but not limited to (LAUSD Enrollment, 2019):

- LAUSD's K-12 open enrollment, which allows students within the LAUSD to apply to any regular, grade-appropriate LAUSD school with designated open enrollment seats;
- Magnet schools and magnet centers, which are open to qualified students in the LAUSD;
- Admission Criteria Schools, which offer specialized programs with additional selection requirements. Boys Academic Leadership Academy, Early College, and University Pathways are accepting applications for students living within and outside of LAUSD boundaries.
- Permits with Transportation is a voluntary integration program that provides students with experiences in integrated school settings.
- Zone of Choice, which allows matriculating 8th grade students living within a Zone of Choice may rank their high school program selections. Zones of Choice are identified as geographic areas comprised of multiple high school options.

Existing Enrollment Capacity

73 The project would result in a total increase of 27 students at Glen Alta Elementary School because this school serves K-8th grade. Of the 27 students generated, 21 would attend elementary school and six would attend middle school at Glen Alta Elementary School.

Based on existing enrollment and capacity data from LAUSD, Glen Alta Elementary, would not have adequate capacity to accommodate the new students generated by the Project under existing conditions. Specifically, with the addition of Project-generated students, Glen Alta Elementary School would have a seating shortage of 70 seats (i.e., existing seating shortage of 43 in addition to the Project student generation of 27 students[74]).

Based on existing enrollment and capacity information from LAUSD, both Woodrow Wilson High School and Abraham Lincoln High School, which are located in the Northeast High School Zone of Choice, are currently overcrowded with a shortage of 673 seats. With the addition of Project-generated students, these two high schools would have a seating shortage of 685 seats (i.e., existing seating shortage of 673 in addition to the Project student generation of 12 students[75]).

Future Enrollment Capacity

With regard to projected future capacity, Glen Alta Elementary School would have a seating shortage of 47 students (i.e., future seating shortage of 20 students in addition to the Project student generation of 27 students).

Regarding future projected capacity, both Woodrow Wilson High School and Abraham Lincoln High School, which are located in the Northeast High School Zone of Choice, would have a projected enrollment of 2,971, with a projected seating overage of 244 seats and no projected overcrowding in the future given that only 12 new high school aged students generated by the Project.

Pursuant to SB 50, prior to the issuance of a building permit, the project proponent would be required to pay development fees to the LAUSD. Pursuant to Government Code § 65995, the payment of these fees is considered full and complete mitigation of Project-related school impacts. Therefore, payment of the applicable development school fees to the LAUSD would offset the potential impact of additional student enrollment at schools that would serve the Project Site. **Therefore, with adherence to SB 50, project impacts on schools would be less than significant and mitigation measures would not be required.**

4.11.c.5 Cumulative Impacts

As shown in **Table 4.11.c-4** below, there are seven related projects that were considered in the cumulative analysis for the proposed project (refer to **Appendix O** of this document). Of the seven related projects, none were identified as being located within the attendance boundaries of Glen Alta Elementary School and six were identified as being within the attendance boundaries of Abraham Lincoln Senior High School and Woodrow Wilson Senior High School. Therefore, these six related projects are considered in this cumulative analysis as these related projects would have the potential to combine with the Project and cumulatively generate new students who would attend Abraham Lincoln High School and Woodrow Wilson Senior High School.

74 27 students are derived from the project generating a net increase of 21 elementary school students and six middle school students for a total of 27 students.

75 Per table 4.11.3-3 above, the Project would generate approximately 12 net new high school students.

Table 4.11.c-4
ESTIMATED STUDENT GENERATION FROM CUMULATIVE PROJECTS WITHIN THE ATTENDANCE BOUNDARIES OF THE SCHOOLS THAT SERVE THE PROJECT SITE

No.	Project	Description	Size	Student Generation Rate [a b, c, d]	Schools				
					Woodrow Wilson Senior High School	Abraham Lincoln Senior High School	El Sereno Middle School	Glen Alta Elementary School	Huntington Drive Elementary
1	Private College 625 E Coleman Avenue	Private College	532 students	N/A	N/A --	N/A --	N/A --	--	--
2	Clearwater El Sereno 2520 N Eastern Avenue	Elementary School	530 students	N/A	N/A	N/A	N/A	--	--
		Apartments	20 du	Students per household: TK-6 0.2269 7-8 0.0611 9-12 0.1296	2 students	2 students	2 students	--	--
		Restaurant	23,230 ksf	0.610 students per 1,000 square feet	5 students	5 students	--	--	--
3	Medical Office 3303 N Broadway	Medical Office	47.3 ksf	0.960 students per 1,000 square feet	14 students	14 students	--	--	--
4	Apartments, Retail and Office 167 W Avenue 34	Apartments	410 du	Students per household: TK-6 0.2269 7-8 0.0611 9-12 0.1296	27 students	27 students	--	--	--
		Retail	10 ksf	0.610 students per 1,000 square feet	2 students	2 students	--	--	--
		Office	30 ksf	1.077students per 1,000 square feet	10 students	10 students	--	--	--

No.	Project	Description	Size	Student Generation Rate [a b, c, d]	Schools				
					Woodrow Wilson Senior High School	Abraham Lincoln Senior High School	El Sereno Middle School	Glen Alta Elementary School	Huntington Drive Elementary
5	Onyx Street Subdivision 2730 N Onyx Drive	Single-family homes	31 du	Students per household: TK-6 0.2269 7-8 0.0611 9-12 0.1296	2 students	2 students	2 students	--	8 students
6	Rosa de Castilla Apartments 4208 E Huntington Drive South	Apartments	90 du	Students per household: TK-6 0.2269 7-8 0.0611 9-12 0.1296	6 students	6 students	6 students	--	20 students
7	Apartments 4201 N Figueroa Street	Apartments	16 du	Students per household: TK-6 0.2269 7-8 0.0611 9-12 0.1296	1 student	1 student	--	--	--
		Retail	7.3 ksf	0.610 students per 1,000 square feet	1 student	1 student	--	--	--
Total Number of Students Generated					**70**	**70**	**4**	**0**	**8**

Notes:

N/A = No generation rate available for this type of land use

NC = it could not be confirmed that the address falls within the boundaries for the school

-- = cumulative project is not located within the attendance boundary of that school. Therefore, student generation was not calculated.

du= dwelling units

ksf = thousand square feet

a = Student Generation Rate is from the 2018 LAUSD Developer Fee Justification Study, pp. 5 and 21.

b= "In determining the impact of new development, the District is required to show how many students will be generated from the new developments. In order to ensure that new development is paying only for the impact of those students that are being generated by new homes and businesses, the student generation factor is applied to the number of new housing units to determine development-related impacts. The student generation factor identifies the number of students per housing unit and provides a link between residential construction projects and projections of enrollment" (Schoolworks, Inc., 2018, p. 5).

For residential land uses, the following student generation rates were used: 0.2269 student per household (grades K-6), 0.0611 student per household (grades 7-8), and 0.1296 student per household (grades 9-12) (Schoolworks, Inc., 2018, Table 3, p. 5).

No.	Project	Description	Size	Student Generation Rate [a b, c, d]	Schools				
					Woodrow Wilson Senior High School	Abraham Lincoln Senior High School	El Sereno Middle School	Glen Alta Elementary School	Huntington Drive Elementary

Because two high schools fall within the attendance boundary for cumulative projects, half of the total students generated are anticipated to attend Woodrow Wilson Senior High, while the other half of the total students generated are anticipated to attend Abraham Lincoln Senior High School, which avoids double-counting potential student impacts on each high school.

Because the 2018 LAUSD Developer Fee Justification Study does not specify which grade levels students fall within for non-residential land uses, the students generated by non-residential uses are assumed to be divided among the elementary school, middle school, and high school levels at the same distribution ratio observed for the residential generation factors (i.e., approximately 52 percent elementary school, 14 percent middle school, and 30 percent high school).

c = The 2018 LAUSD Developer Fee Justification Study states that when using the Census data to determine the average district student yield rate, it is not possible to determine which students were living in multi-family units versus single-family units. Therefore, only the total average yield rate is shown. Thus, there are not different student generation rates for single-family vs. multi-family units (Schoolworks, Inc., 2018, pp. 5).

d = The 2018 LAUSD Developer Fee Justification Study does not provide a student generation factor for restaurant. Thus, the highest available rate for comparable land use has been applied (0.610 students per 1,000 square feet for Neighborhood Shopping Center). No student generation rate is provided for the college or elementary school land uses because those uses would accommodate students and no generation rate of that type was provided in the 2018 LAUSD Developer Fee Justification Study.

As shown in **Table 4.11.c-4** above, the seven cumulative projects located within the attendance boundaries of the same schools that would serve the Project could potentially generate no Glen Alta Elementary School students, 70 Abraham Lincoln High School students and 70 Woodrow Wilson Senior High School students, based on the rates provided by LAUSD staff in the 2018 LAUSD Developer Fee Justification Study for LAUSD. As indicated above, the Project would generate approximately 39 net new students consisting of 21elementary school students, six middle school students, and 12 high school students. Therefore, the Project in combination with the seven cumulative projects would have the potential to generate a cumulative total of 27 Glen Alta Elementary School students and 152 high school students.

Based on existing enrollment and capacity data from LAUSD, the schools serving the Project and the seven cumulative projects would not have adequate capacity. Specifically, with the addition of students generated by the Project in combination with the seven related projects, Glen Alta Elementary School would have a seating shortage of 70 students (i.e., existing seating shortage of 43 students in addition to a net increase of 27 students from the proposed project). The cumulative (i.e. related) projects would not generate new students because none of the seven projects fall within the attendance boundaries for Glen Alta Elementary School. Wilson High School and Abraham Lincoln High School would have a seating shortage of 825 students (i.e. existing seating shortage of 673 seats in addition to the Project's 12 students, plus related project's student generation of 140 students.

With regard to projected future capacity, Glen Alta Elementary School would have a seating shortage of 47 students (i.e., future seating shortage of 20 students in addition to the 27 students generated by the Project) but no additional students are anticipated from the related projects. Abraham Lincoln High School would not have a seating shortage and Woodrow Wilson Senior High School would not have a seating shortage. Therefore, the students generated by the Project in combination with the seven cumulative projects located within the school attendance boundaries would not cause a shortage when compared to existing conditions and projected school capacity at Glen Alta Elementary School, Abraham Lincoln High School, and Woodrow Wilson Senior High School.

Cumulative growth would increase the demand for LAUSD school services in the vicinity of the Project Site. However, the Project is estimated to comprise a small percentage (approximately 6.7 percent[76]) of the total estimated cumulative growth in students. Pursuant to SB 50, future development, including cumulative/related projects, would be required to pay development impact fees for schools to the LAUSD. **Pursuant to Government Code § 65995, the payment of school impact fees would be considered full and complete mitigation of school impacts generated by cumulative/related projects. Therefore, the Project-level and cumulative impacts related to schools would be less than significant. Therefore, no mitigation measures for schools would be necessary.**

As discussed in **Section 3.0**, Environmental Setting, of this Draft EIR, there are seven related projects that were considered in the cumulative analysis for the proposed project. The related projects generally consist of infill development including apartments, single family homes, mixed use, retail, office and school uses (KOA, 2019, Attachment F). Similar to the proposed project, the cumulative projects would be required to comply with relevant land use policies and regulations and would be subject to CEQA review.

76 179 cumulative students generated including students from the Project. 12 students from the Project divided by 179 equals approximately 6.7 percent.

Implementation of the proposed project along with the cumulative projects considered for the purpose of this analysis would not have cumulatively significant impacts related to schools. **Therefore, cumulative impacts related to schools would be less than significant and would not be cumulatively considerable.**

4.11.c.6 Mitigation Measures

As discussed above in Threshold (c), Project-level and cumulative impacts with regards to school facilities during project construction and operation would be less than significant. Therefore, no mitigation measures are required.

4.11.c.7 Level of Significance after Mitigation

Project-level and cumulative impacts related to schools would be less than significant without mitigation.

4.11.d Recreation and Parks

4.11.d.1 Introduction

This section of the draft EIR discusses the Project's impacts on public recreation and parks facilities managed by the City of Los Angeles Department of Recreation and Parks (DRP). This section describes the existing public recreation and parks facilities in the Project area and analyzes: 1) if the existing parks and recreation facilities would be sufficient to accommodate the Project; 2) the impacts of the Project on existing parks and recreation facilities; and 3) the Project's consistency with the applicable City goals and regulatory requirements related to parks and recreation.

4.11.d.2 Environmental Setting

4.11.d.2.1 Regulatory Framework

Federal

There are no federal regulations that pertain to this issue area.

State

<u>The Quimby Act</u>

The California Legislature first established the Quimby Act in 1975 and amended the act in 1982. Per the Quimby Act, California allows a city or county to pass an ordinance that requires, as a condition of approval of a subdivision, the dedication of land, the payment of a fee in-lieu of dedication, or a combination of both for park or recreational purposes (California Government Code § 66477). This legislation establishes maximum parkland dedication standards for new subdivision development unless the amount of existing neighborhood and community parkland exceeds the limit. In the City of Los Angeles, the Quimby Act is implemented via Los Angeles Municipal Code (LAMC) Section 17.12, which requires developers of residential subdivisions to set aside and dedicate land for park and recreational uses and/or pay in-lieu fees for park improvements. LAMC Section 12.33 extends these requirements to multi-family residential use projects that require a change in zoning. The Quimby Act permits the City to require parkland dedications not to exceed three acres of parkland per 1,000 persons residing in a subdivision, and/or in-lieu fee payments for residential development projects.

Local

<u>City Charter</u>

The basic law of the government of the City of Los Angeles is found in the City Charter. According to the City Charter, the City of Los Angeles Department of Recreation and Parks (DRP) has the responsibility to establish, construct, maintain, operate and control all parks, recreational facilities, museums, observatories, municipal auditoriums, sports centers and all lands, waters, facilities or equipment set aside or dedicated for recreational purposes and public enjoyment in the City. As discussed below, two planning documents, the Public Recreation Plan, which is a part of the City of Los Angeles General Plan, and the Community Plan, provide planning goals, objectives and policies related to parks, recreational facilities and open space areas in the vicinity of the Project Site.

City of Los Angeles General Plan Framework Element

The City's General Plan Framework Element (the Framework Element), adopted in December 1996 and readopted in August 2001, contains policies and objectives that address public services and open space within the City (City of Los Angeles Department of City Planning, 2018a).

A. Infrastructure and Public Services Chapter

The goals, objectives and policies found in the Infrastructure and Public Services Chapter of the Framework Element address thirteen infrastructure and public service systems, many of which are interrelated, and all of which will help support the City's population and economy as it moves into the 21st century. The systems include: wastewater, stormwater, water, solid waste, police, fire, libraries, parks, power, schools, telecommunications, street lighting, and urban forest (City of Los Angeles Department of City Planning, 2018a). The Infrastructure and Public Services Chapter contains the following goals, objectives, and policies related to parks.

Goal 9L: Sufficient and accessible parkland and recreation opportunities in every neighborhood of the City, which gives all residents the opportunity to enjoy green spaces, athletic activities, social activities, and passive recreation.

Objective 9.22: Monitor and forecast demand for existing and projected recreation and park facilities and programs.

Policy 9.22.1: Monitor and report appropriate park and recreation statistics and compare with population projections and demand to identify the existing and future recreation and parks needs of the City.

Objective 9.24: Phase recreational programming and park development with growth.

Policy 9.24.1: Phase the development of new programs and facilities to accommodate projected growth.

B. Open Space and Conservation Chapter

The Open Space and Conservation Chapter of the General Plan Framework encourages the use of open space to enhance community and neighborhood character. Open Space and Conservation policies examine unconventional, non-statutory ways that the City of Los Angeles may create and utilize open space, particularly in parts of the City where there is a significant deficiency of this resource. Opportunities for open space and recreation resources could exist through use of non-traditional resources such as vacated railroad lines, drainage channels, planned transit routes and utility rights-of-way, or pedestrian-oriented streets and small parks. The City of Los Angeles is characterized as an urbanized area framed by open space. It is economically, socially, and ecologically imperative that Los Angeles takes advantage of all existing open space elements within the City to create an interconnected Citywide Greenways Network to attract new investment, distribute open space resources to all residents in the City, and improve the quality and supply of Los Angeles' ecology (City of Los Angeles Department of City Planning, 2018a). The Open Space and Conservation Chapter identifies the following goal for parks and open spaces:

Goal 6A: An integrated citywide/regional public and private open space system that serves and is accessible by the City's population and is unthreatened by encroachment from other land uses

City of Los Angeles General Plan Public Recreation Plan

The Public Recreation Plan is a component of the City's General Plan that sets forth recreational guidelines to provide a basis for satisfying needs for recreational sites within the City. The Public Recreation plan emphasizes the importance of neighborhood, community and regional recreational sites and parks in the daily lives of the residents in the City. The guidelines in the Public Recreation Plan state that recreational sites and facilities should be provided at a broad range of levels that collectively help communities reach a recommended overall provision of 10 acres of land per 1,000 persons. The location and allocation of acreage for neighborhood, community and regional recreational sites and facilities should be determined by the DRP on the basis of the service radius within residential areas in the City.

The desired long-range standard for local parks (including neighborhood sites and facilities and community sites and facilities) is based on a minimum of two acres per 1,000 persons for neighborhood parks with a service radius of 0.5 miles, and a minimum two acres per 1,000 persons for community parks with a service radius of two miles (City of Los Angeles Department of City Planning, 2018a, Public Recreation Plan Element, p. 3). However, the PRP states that the long-range Local Recreation Standards may not be reached during the life of the PRP and, therefore, includes more attainable short- and intermediate-range standards of one acre per 1,000 persons within a one-mile service radius for neighborhood parks and one acre per 1,000 persons within a two-mile service radius for community parks. It should be noted that these standards are Citywide goals and are not intended to be requirements for individual development projects (City of Los Angeles Department of City Planning, 2018a, Public Recreation Plan Element, p. 3).

City of Los Angeles General Plan Health and Wellness Element

The Plan for a Healthy Los Angeles is the Health and Wellness Element of the General Plan, which lays the foundation to create healthier communities for all Angelenos. The Plan acknowledges the relationship between public health and issues such as transportation, housing, environmental justice, and open space, among others, by reviewing the relevant policies in the General Plan and identifying where further policy direction is needed to achieve the goal of creating a healthy and sustainable City (City of Los Angeles Department of City Planning, 2018a, p. 6). The Plan for a Healthy Los Angeles identifies seven primary goals and related policies and programs for creating healthier neighborhoods. Three primary goals related to the importance of parks and open spaces identified in the Health and Wellness Element are:

- A City Built for Health: Use design, construction and public services to promote the physical, mental, and social well-being of its residents and make it easier for people to shop, buy fresh produce, visit a doctor, have meaningful social interactions, breathe cleaner air, and live and age in their community, across income levels and physical abilities.

- Bountiful Parks and Open Spaces: Support opportunities for physical activity, offer safe havens for families and children, provide spaces for social interaction, provide access to nature, and offer mental respite.

- An Environment Where Life Thrives: Provide a healthy environment, where residents are less susceptible to health concerns related to poor air quality and increased exposure to environmental hazards and toxins.

Citywide Community Needs Assessment

In 2009, the City of Los Angeles Department of Recreation and Parks conducted and accepted a Citywide Community Needs Assessment. The Needs Assessment was a critical step in the development of a Citywide Recreation and Parks Master/Strategic Plan and a Five-year Capital Improvement Plan supporting a new vision for the City of Los Angeles' Recreation and Parks Department. The overall objectives of the Citywide Community Needs Assessment were to prioritize and address the tremendous needs for additional recreation and park land, to identify existing facilities needing improvements to meet current and future community needs, to identify recreation program needs, to perform demographic analysis, to prevent future maintenance problems, and to offer positive alternatives to an increasingly dense and urbanized population (City of Los Angeles Department of Recreation and Parks, 2009, p. 3). The Needs Assessment provides a number of strategies and recommendations to be implemented through a detailed master planning process.

Community Plan

In the Community Plan Area, important open space areas exist separate from land under the control of the City of Los Angeles Department of Recreation and Parks. Open space is important for physical and environmental protection (City of Los Angeles, 2016).

Goal 4: Sufficient open space, in balance with development, to serve the recreational, environmental, and health needs of the community and to protect environmental and aesthetic resources.

- Objective 4-1: To preserve existing views in hillside areas.
  - Policy 4-1.1: Encourage the retention of passive and visual open space which provides a balance to the urban development of the Plan Area.
- Objective 4-2*:* To preserve existing open space resources and, where possible, encourage acquisition of new open space.
  - Policy 4-2.1: Accommodate and promote active use of parklands and open space and promote and preserve greenways.

Goal 5: Adequate recreation and park facilities to meet the needs of the residents in the plan area.

- Objective 5-1: To conserve, expand, maintain, and better utilize existing recreation and park facilities to address the recreational needs of the community.

Los Angeles Municipal Code

Park Fee Ordinance No. 184505 (Ordinance) increases the opportunities for park space creation and expands the fee program beyond those projects requiring a subdivision map to include a park linkage fee for all net new residential units. The Ordinance amends §§ 12.21, 12.33, 17.03, 17.12 and 17.58 of the LAMC, deletes §§ 17.07 and 19.01 of the LAMC, and adds § 19.17 of the LAMC. The Ordinance

increases Quimby fees, provides a new impact fee for non-subdivision projects, eliminates the deferral of park fees for market rate projects that include residential units, increases the fee spending radii from the site from which the fee is collected, provides for early City consultation for subdivision projects or projects with over 50 units in order to identify means to dedicate land for park space, and updates the provisions for credits against park fees.

As stated in Los Angeles Municipal Code § 12.33 G, Affordable Housing Exemption, new residential dwelling units which are rented or sold to persons or households of very-low, low or moderate income may receive an affordable housing exemption from the park fee and land dedication requirement. The Los Angeles Housing and Community Investment Department will evaluate the Project and advise the Department of Recreation and Parks and the Department of City Planning about whether the Project qualifies for an exemption. As shown in **Table 4.11.d-1**, LAMC § 12.21-G Open Space Requirements, LAMC § 12.21-G establishes open space requirements for Common Open Space and Private Open Space.

Table 4.11.d-1
LAMC SECTION 12.21-G OPEN SPACE REQUIREMENTS

Type of Open Space	Requirements
Common Open Space	• Ready accessible to all residents of the site • Minimum area of 500 square feet • At least 50 percent of the required usable open space
Recreation Rooms	• At least 600 square feet in size • No more than 20 percent of the total required usable open space
Private Open Space	• Minimum of 50 square feet, of which no more than 50 square feet per dwelling unit shall be attributed to the total required usable open space • No horizontal dimension less than 6 feet • Minimum of 8-foot vertical clearance under any projection

SOURCE: LAMC, Section 12.21-G.

4.11.d.2.2 Existing Conditions

Park and Recreation Facilities in the Project Area

Recreational services within the City of Los Angeles are provided by the City's DRP, stewards to over 16,000 acres of parkland, offering extensive recreational, social and cultural programs at 444 park sites in the City of Los Angeles (City of Los Angeles Department of Recreation and Parks, 2018a). The Northeast Los Angeles Community in which the Project is located maintains 39 recreational facilities. This includes 15 parks, 23 recreation centers, and one golf course (City of Los Angeles Geohub, 2016).

An information request letter was sent to the City of Los Angeles Department of Recreation and Parks asking about potential impacts of the Project to park and recreational facilities. The response letter from the Department of Recreation and Parks (refer to **Appendix N3**; Ford, 2018), states that there are five neighborhood parks and 19 community parks within a two-mile radius area around the Project Site. There are four regional parks within a ten-mile radius area around the Project Site.

The City of Los Angeles has 0.76 acres of neighborhood and community park acreage per 1,000 people. The Community Plan Area has 1.47 acres of neighborhood and community park acreage per 1,000 people (Ford, 2018).

Recreational facilities within the immediate vicinity of the Project Site include several nearby local parks and recreational centers (i.e., Ascot Hills Park, El Sereno Recreational Center, Montecito Heights Recreational Center and Senior Citizen Center, Ramona Hall Community Center, Rose Hill Park (just north of the Project Site, across Florizel Street), Rose Hill Recreation Center (southeast of the Project Site), and Sycamore Grove Park). Refer to **Figure 4.11.d-1**, which shows the location of nearby parks and recreational facilities. Many of these recreational facilities are within walking distance of the Project Site, and these facilities include sports programs (i.e., baseball, softball), and other programs such as arts and crafts, pre-school programs, after-school programs, and senior clubs. Located in the vicinity of the Project Site are two large natural areas (Montecito Heights Open Space and the Arroyo Seco). **Figure 4.11.d-2** shows the location of trails in the vicinity of the Project Site. The proposed Los Angeles River Trail is located approximately four miles from the Project Site (Google Earth Pro, 2018).

The Project Site is located adjacent to (across Florizel Street) Rose Hill Park (Google Earth Pro, 2018), which includes the following facilities: barbecue pits, baseball diamond with lights, unlit baseball diamond, children's play area, and picnic tables (City of Los Angeles Department of Recreation and Parks, 2018b). The Project Site is approximately 200 feet from the Rose Hill Recreation center, located at 4530 Mercury Avenue. The recreation center offers barbecue pits, baseball diamond, basketball courts, children's play area, picnic tables, and multipurpose sports field, as well as fitness and after-school programs (City of Los Angeles Department of Recreation and Parks, 2018c). The Project Site is located adjacent to the Ernest E. Debs Regional Park, which is located at 4235 Monterey Road (Google Earth Pro, 2018). This regional park encompasses 282 acres and is one of the largest open space nature reserves within the City of Los Angeles. The park includes an Audubon Nature Center and provides educational activities that are focused on nature, and plant restoration projects. Additionally, this park includes BBQ pits, picnic tables, biking and hiking trails, and a pond. The park is maintained by the City of Los Angeles Department of Recreation and Parks.

For the purpose of analysis of Project impacts on recreation and parks, a two-mile radius area around the Project Site was considered. The Community Plan area comprises approximately 15000 acres and is occupied by approximately 250,000 residents (City of Los Angeles, 2016, pg. I-1). Given the similar densities within different neighborhoods in the Community Plan area, an estimate of the number of people residing within the two-mile study area was calculated based on the average number of people residing within one acre of the Community Plan area. Using this metric, it was estimated that the number of people residing within the two-mile study area or the service population for recreation and parks space within the two-mile radius study area is approximately 133,913 residents.

Table 4.11.d-2 lists the parks and recreational facilities located within a two-mile radius of the Project Site. The two-mile radius study area encompasses a total area of approximately 8038 acres. As shown in **Table 4.11.d-2**, existing parks and reaction facilities within the two-mile radius study area include approximately 659.23 acres of total park and recreation space and 234.66 acres of neighborhood and community park space. Therefore, the two-mile study area has approximately 4.9 acres of total park and recreation space and 1.7 acres of neighborhood and community park acreage per 1000 people.

Figure 4.11.d-1
NEARBY PARKS AND RECREATIONAL FACILITIES

Figure 4.11.d-2
NEARBY TRAILS

Path: J:\Projects\6022A_HACLA_Rose_Hill\MXDs\IS_MND\6022A_HACLA_4_15_Trails_2018_03_01.mxd
Service Layer Credits: Sources: Esri, HERE, DeLorme, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), MapmyIndia, NGCC, © OpenStreetMap contributors, and the GIS User Community, Esri, HERE, DeLorme, MapmyIndia, © OpenStreetMap contributors, Esri, HERE, DeLorme, MapmyIndia, © OpenStreetMap contributors, and the GIS user community, Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community; Cal Fire, 2007; County of Los Angeles Department of Parks and Recreation, 2016; UltraSystems Environmental, Inc., 2018

March 1, 2018

Rose Hill Courts Redevelopment

Nearby Trails

Scale 1:63,360

N

Legend

- Project Location
- L.A. River Trail Extension Trail (Proposed)

0 0.5 1 Miles

0 0.5 1 Kilometers

UltraSystems

Table 4.11.d-2
PARKS AND RECREATIONAL FACILITIES WITHIN TWO-MILE RADIUS OF PROJECT SITE

Park	Location	Approximate Distance from the project site in mile(s)	Acreage
Neighborhood Parks			
El Sereno Arroyo Playground	5500-5522 Concord Avenue	1.70	1.21
El Sereno Community Gardens	5450 E. Huntington Drive	1.77	0.77
Henry Alvarez Memorial Park	2830 Lancaster Avenue	1.96	2.57
Hermon Park	5566 Via Marisol	1.24	22.41
Hermon Dog Park	5566 Via Marisol	1.43	1.30
Community Parks			
Arroyo Seco Park	5568 Via Marisol	1.80	63.19
Carlin G. Smith Recreation Center	511 W. Avenue 46	1.52	2.65
El Sereno North Park	4410 Garden Homes Avenue	1.5	3.08
El Sereno Recreation Center	4721 Klamath Street	0.9	14.0
El Sereno Senior Citizens Center	4818 Klamath Place	1.1	8.0
Hazard Park	2230 Norfolk Street	2.0	24.18
Highland Park Recreation Center	6150 Piedmont Avenue	1.8	5.41
Highland Park Senior Citizens Center	6152 N. Figueroa Street	1.9	--
Lincoln Heights Recreation Center	2303 Workman Avenue	1.7	1.59
Lincoln Park	3501 Valley Boulevard	1.5	43.25
Montecito Heights Recreation Center	4545 Homer Street	0.9	20.02
Ramona Hall Community Center	4580 N. Figueroa Street	1.1	1.43
Rose Hill Park	3606 Boundary Avenue	0.1	2.29
Rose Hill Recreation Center	4530 Mercury Avenue	0.12	2.26
Sycamore Grove Park	4702 N. Figueroa Street	1.1	15.05
Regional Parks			
Ascot Hills Park	4371 Multnomah Street	1.1	93
Charles F. Lummis Home	200 E. Avenue 43	0.0	3
Ernest E. Debs Regional Park	4235 Monterey Road	0.7	318.57

Park	Location	Approximate Distance from the project site in mile(s)	Acreage
Heritage Square	3800 Homer Street	0.9	10
Total park space within two-mile radius of Project Site			659.23

Source: Ford, 2018 and Google Earth Pro, 2019.
Notes:
--: Not applicable because this is not a park.

4.11.d.3 Project Impacts

4.11.d.3.1 Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G, the project would have a significant impact related to recreation and parks if it would:

Threshold (a): ***Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks; or***

Threshold (b): ***Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or***

Threshold (c): ***Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.***

4.11.d.3.2 Methodology

For the purpose of analyzing potential Project impacts on public services and facilities, existing public services and facilities in the vicinity of the Project Site were reviewed and identified. A discussion of existing public services and facilities in the vicinity of the Project Site is provided in **Section 4.11.d.2.2** above. Potential Project impacts on recreation and parks were evaluated based on: 1) the estimated increase in population to be generated by the Project; 2) input received from the Los Angeles DRP via a response letter received in response to the information request letters sent by UltraSystems (refer to **Appendix N3** for details); and 3) anticipated increased demand for park and recreation service generated by the Project and its effect on existing level of service. The analysis of Project impacts related to recreation and parks also evaluates project consistency with the standards and regulations set forth in regulatory documents such as the LAMC, the Quimby Act, the California Building Code, and the City's General Plan, described in **Section 4.11.d.2.1** above.

4.11.d.3.3 Analysis of Project Impacts

Project Design Features

In the comment letter from Darryl Ford (Ford, 2018) regarding the proposed Project, it states: "We encourage the applicant to link with nearby recreation and park facilities and consider mutually beneficial partnerships between park programs, operations, and improvements." The Project applicant is willing to explore potential partnerships with the City of Los Angeles Department of Recreation and Parks, and plans to coordinate any services provided onsite with services already provided at Rose Hill Recreation Center to avoid duplication. In response to this comment, the Project includes the following project design feature (PDF) with regard to recreation and parks:

REC PDF-1: Not less than 90 days prior to the anticipated construction completion the Project Applicant will reach out to the City of Los Angeles Department of Recreation and Parks staff responsible for the programming (if any) at various neighborhood, community, and regional parks located within a 2-mile radius of the Project site to consider mutually beneficial partnership between park programs, operations, and improvements. These parks and recreation facilities include, but are not limited to, El Sereno Arroyo Playground, El Sereno Community Gardens, Henry Alvarez Memorial Park, Hermon Dog Park, Hermon Park, Arroyo Seco Park, Carlin G. Smith Recreation Center, Cypress Recreation Center, Cypress Recreation Center, Downey Recreation Center, Ascot Hills Park and Charles F. Lummis Home.

The Project would comply with Park Fee Ordinance No. 184505 and LAMC §§ 12.21 G, and 12.33 G. In addition, the Project provides recreational uses onsite. The City of Los Angeles Department of Recreation and Parks' website states that "New residential dwelling units which are rented or sold to persons or households of very-low, low, or moderate income may be eligible to receive an affordable housing exemption for the park fee and land dedication requirement (LAMC § 12.33 G)" (City of Los Angeles Department of Recreation and Parks, 2018e).The Project would pay any required fees for park space as permitted under LAMC § 12.33. Regardless of whether the proposed Project is exempt from fees or if fees are paid, the ample amount of Project open space and recreational amenities proposed on the Project Site, would more than satisfy the City's park and open space requirements for the Project.

Project Impacts

Threshold (a): ***Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks?***

Threshold (b): ***Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?***

Threshold (c): ***Would the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?***

<u>Project Construction</u>

Construction of the Project would introduce construction jobs and therefore construction workers

on the Project Site. However, construction jobs created by the Project would not result in substantial population growth in the Project area because construction jobs are temporary in nature. It is anticipated that the persons filling the construction jobs would be from the local area and would not result in an increase in population in the Project vicinity.

During Project construction, the construction workers could potentially visit nearby parks, such as Rose Hill Park directly north of the Project Site. It is expected they could potentially visit these parks only during their lunch breaks during the weekdays and not in the evening or on the weekends when they would not be working at the Project Site. However, less than significant impacts would occur during Project construction because construction workers would cease to visit nearby parks after the completion of construction. Additionally, due to the scope of the proposed Project, there would not be a large number of construction workers on the Project Site.

During construction of the Project, there is the potential for short-term impacts associated with air quality, noise and traffic; however, these typically do not result in physical impact on the parks or accelerate deterioration of parks. Impacts related to these topics are analyzed in **Sections 4.2, 4.9**, and **4.12**, respectively.

The response to the information request letter sent to the City of Los Angeles Department of Recreation and Parks (refer to **Appendix N3** of this document) states: "Given the proximity of the project to Rose Hill Recreation Center and Ernest E. Debs Regional Parks extraordinary care should be taken to limit construction impacts and protect access to the parks" (Ford, 2018). **Mitigation measure PS-3 (provided in Section 4.11.d.5 below) is recommended to reduce potential impacts on nearby park/recreation access to a less than significant level.**

<u>Project Operation</u>

The Project would provide 185 units which is anticipated to result in an approximate Project population of 656 residents. This would result in an increase of 85 housing units and 435 more residents, compared to current (January, 2019) conditions, which could increase the demand for park and recreational facilities.

The Project would be subject to fees such as school, parks/recreation, library, and sewer impact fees. Where applicable, the Project applicant will apply for exemptions and/or reduced fees. The response to the information request letter sent to the City of Los Angeles Department of Recreation and Parks (refer to **Appendix N3** of this document) indicates that the additional population of the Project "could add to a burdened system" (Ford, 2018). In response to what mitigation is recommended for potential Project impacts, the letter states: "We encourage the applicant to link with nearby recreation and park facilities and consider mutually beneficial partnerships between park programs, operations, and improvements" (Ford, 2018).

The Project would provide several courtyards, each with a unique design theme and use. Outdoor space adjacent to the community building would offer places for outdoor social gatherings, and special events and neighborhood celebrations, with shaded areas seating and BBQ grills for outdoor dining. Areas designed for use by children would feature tot lots for use by children from 2-12 years of age. There would be play areas for children, from tot lots to hard surface play, experiential play elements that encourage interaction and group play. The landscape design would create a park-like setting for residents.

The proposed Project is expected to result in an increase in the number of residents living on the Project Site by approximately 435 people. This increase in the residential population would increase the use of recreational facilities, however, the Project would include common indoor space (lobbies in buildings A and B, and the Community Center), common outdoor space (courtyards and play areas), and private open space (private patios), as well as landscaped area as detailed in the **Table 4.11.d-3** below. The Project will comply with Park Fee Ordinance No. 184505 and LAMC §§ 12.21 G, and 12.33 G.

Table 4.11.d-3
OPEN SPACE/AMENITY SUMMARY

Type	Square Footage
Common Indoor Space	Phase I: 1,830 square feet Phase II: 6,366 square feet
Common Outdoor Space	Phase I: 10,708 square feet Phase II: 15,708 square feet
Private Open Space	Phase I: 4,450 square feet Phase II: 4,800 square feet
Sub-Total by Phase	Phase I: 16, 988 square feet Phase II: 26,874 square feet
Grand Total	**43,862 square feet**

Source: Withee Malcolm Architects, 2019. Rose Hill Courts Project Plans

The Project increase in population and associated demand on recreational facilities and open space over existing conditions would be small, and the Project's contribution to use of recreational facilities and open space would not require the construction or expansion of recreational facilities that would result in adverse physical effects on the environment.

The Project would provide approximately 26,416 sq. ft. or approximately 0.6 acre of common outdoor space, resulting in 0.91 acres per 1,000 residents of common outdoor space. Thus, the Project would not meet the Los Angeles Department of Recreation and Parks' long-range standard of two acres per 1,000 residents for neighborhood parks with a service radius of 0.5 miles and two acres per 1,000 residents for community parks with a service radius of two miles.[77] It should be noted that these standards are Citywide goals and are not intended to be requirements for individual development projects (City of Los Angeles Department of City Planning, 2018a, Public Recreation Plan Element, p. 3). The City's Public Recreation Plan (PRP) provides more attainable short-term/intermediate-range standards of: one acre per 1,000 persons within a one-mile service radius for neighborhood and community parks, or two acres per 1,000 persons within a two-mile radius for community parks (City of Los Angeles Department of City Planning, 2018a, Public Recreation Plan Element, p. 3). However, as stated above, these standards are Citywide goals and are not intended to be requirements for individual development projects (City of Los Angeles Department of City Planning, 2018a, Public Recreation Plan Element, p. 3). When subtracting the private open space square footage from the Project total recreational space, the Project provides approximately

77 City of Los Angeles, Los Angeles Citywide General Plan Framework EIR, June 1996, p. 2.14-2.

0.79 acres of outdoor/indoor space for an approximate population of 656 persons, which meets the City's standard of one acre per 1,000 persons within a one-mile radius for neighborhood parks.[78]

Furthermore, the two-mile study area around the Project Site provides access to approximately 4.9 acres of total park and recreation space and 1.7 acres of neighborhood and community park acreage per 1000 people. The Project is located adjacent to Rose Hill Park and the Rose Hill Recreation Center, approximately 0.27 mile from Ernest E. Debs Regional Park, and within a two-mile radius of numerous other parks and open space facilities. These facilities would support demand for the Project's residential demand for parks and recreational, in addition to that provided by the proposed onsite recreational facilities and open space. The Project-related increase in population and associated demand on parks over existing conditions would be small, and the Project's contribution to park use would not cause substantial degradation of existing facilities or require new or expanded public parks. Additionally, the Project would not conflict with the Community Plan's goal to provide sufficient open space. The Project would be consistent with this goal because the Project would not eliminate existing views in hillside areas and would not remove existing open space resources.

As discussed above, **the Project will comply with Park Fee Ordinance No. 184505 and LAMC §§ 12.21 G, and 12.33 G. In addition, the Project provides park and recreational spaces onsite. In addition, Project Design Feature Recreation and Parks PDF-1 would implement public involvement and a mutually beneficial partnership between park programs, operations, and improvements in the community. Therefore, operational impacts related to recreation and parks would be less than significant.**

4.11.d.4 Cumulative Impacts

As discussed in **Section 3.0**, Environmental Setting, of this draft EIR, there are seven related projects that were considered in the cumulative analysis for the proposed Project. The related projects generally consist of infill development including apartments, single family homes, mixed use, retail, office and school uses (KOA, 2019, Attachment F). Similar to the proposed Project, the cumulative projects would be required to comply with relevant land use policies and regulations and would be subject to CEQA review. As discussed above in **Section 4.11.d.3**, the Project would be consistent with standards and regulations contained in existing planning documents that regulate the provision of parks and recreation facilities in the City of Los Angeles.

Given the proximity of the Project to Rose Hill Recreation Center and Ernest E. Debs Regional Park, extraordinary care would be taken to limit construction impacts and protect access to those parks. **Mitigation Measure PS-3** (provided in **Section 4.11.d.5** below) would reduce potential impacts on nearby park/recreation access to a less than significant level.

Implementation of the proposed Project along with the cumulative projects considered for the purpose of this analysis would not have cumulatively significant impacts related to park and recreation services. **Therefore, cumulative impacts related to recreation and parks facilities would be less than significant and would not be cumulatively considerable.**

78 Using the ratio of one acre per 1,000 persons, the project's estimated population of 656 persons would require approximately 0.66 acres of neighborhood park land. The project proposes approximately 0.79 acres of common indoor space and common outdoor space.

4.11.d.5 Mitigation Measures

As discussed above in **Section 4.11.d.3,** the response letter from the City of Los Angeles Department of Recreation and Parks states: "Given the proximity of the project to Rose Hill Recreation Center and Ernest E. Debs Regional Parks extraordinary care should be taken to limit construction impacts and protect access to the parks." Therefore, the following measure is provided to reduce potential impacts on nearby park/recreation access during Project construction.

PS-3 **Public Services (Access to Existing Park/Recreation Facilities During Construction)**
During Project construction the construction contractor shall ensure that access to Rose Hill Recreation Center, Rose Hill Park, and Ernest Debs Regional park is maintained for the public. If access to these facilities is temporarily blocked off during construction, the construction contractor shall ensure that an alternate route is available for public access and the contractor shall provide signs clearly marking the alternate route to the park/recreation facilities.

4.11.d.6 Level of Significance after Mitigation

With implementation of mitigation measure **PS-3** there would be less than significant impacts regarding access to the Rose Hill Recreation Center, Rose Hill Park, and Ernest E. Debs Regional Park during the construction phase of the Project. During Project operation, Project-level and cumulative impacts related to parks would be less than significant without mitigation.

4.11.e Libraries

4.11.e.1 Introduction

This section of the draft EIR discusses the potential impacts of the Project with regard to the provision of library facilities and services. This section describes the existing library facilities and services in the Project area and analyzes: 1) if the existing services and facilities would be sufficient to accommodate the Project, and 2) the impacts of the Project on existing library facilities.

4.11.e.2 Environmental Setting

4.11.e.2.1 Regulatory Framework

Federal

There are no federal regulations pertaining to library facilities and services.

State

There are no state regulations pertaining to library facilities and services.

Local

<u>City of Los Angeles General Plan Framework Element</u>

The City's General Plan Framework Element (the Framework Element), adopted in December 1996 and readopted in August 2001, contains policies and objectives that address public services and open space within the City (City of Los Angeles Department of City Planning, 2018a).

A. Infrastructure and Public Services Chapter

The goals, objectives and policies found in the Infrastructure and Public Services Chapter of the Framework Element address thirteen infrastructure and public service systems, many of which are interrelated, and all of which will help support the City's population and economy as it moves into the 21st century. The systems include: wastewater, stormwater, water, solid waste, police, fire, libraries, parks, power, schools, telecommunications, street lighting, and urban forest (City of Los Angeles Department of City Planning, 2018a). The Infrastructure and Public Services Chapter contains the following goals, objectives, and policies related to libraries.

Libraries

- Objective 9.20: Adopt a citywide library service standard by the year 2000.
    - Policy 9.20.1: Develop library standards dealing with the facilities' net floor area, appropriate number of permanent books per resident, and their service radius.
- Objective 9.21: Ensure library services for current and future residents and businesses.
    - Policy 9.21.1: Seek additional resources to maintain and expand library services.

Los Angeles Public Library Branch Facilities Plan

The **Los Angeles Public Library Branch Facilities Plan** was approved by the Board of Library Commissioners on February 8, 2007. The Library Branch Facilities Plan is the guiding document for future development of public library facilities in the City. This Plan guides construction, maintenance, and organization of public branch libraries and establishes standards in defining geographic service areas and the size of branch facilities. This Plan also includes criteria for new Libraries, which recommends new size standards for the provision of Los Angeles Public Library (LAPL) facilities – 12,500 square feet for a community with less than 45,000 population and 14,500 square feet for a community with more than 45,000 population and up to 20,000 square feet for a Regional branch. It also recommends that when a community reaches a population of 90,000, an additional branch library should be considered for the area (Granger, 2018).

Los Angeles Public Library Strategic Plan 2015-2020

The **Los Angeles Public Library Strategic Plan 2015-2030 identifies LAPL's goals and objectives related to library facilities and services. The six main goals of the LAPL Strategic Plan that focus on improvement of library services and increasing the number of people who use library services, include: 1)** Cultivate and Inspire Young Readers, 2) Nurture Student Success, 3) Champion Literacy and Lifelong Learning, 4) Contribute to L.A.'s Economic Growth, 5) Stimulate the Imagination, and 6) Strengthen Community Connections and Celebrate L.A. The Strategic Plan does not include goals or objectives for construction of new library facilities or expansion of existing facilities. Goals and objectives guiding development of future public library facilities are provided in the **Los Angeles Public Library Branch Facilities Plan discussed above.**

Northeast Los Angeles Community Plan

The Northeast Los Angeles Community Plan seeks to achieve balance between the location, characteristics and phasing of public facility developments with proposed land use patterns (City of Los Angeles, 2016).

Goal 7: Adequate library facilities and services for the area's residents.

- Objective 7-1: To assist the City Library Department in providing adequate library service which responds to the needs of the community.

4.11.e.2.2 Existing Conditions

Library services within the City are provided by the LAPL. Within the City of Los Angeles, the LAPL provides library services at the Central Library, eight regional branch libraries, and 64 community branches. Approximately 6.9 million books and other materials comprise the LAPL collection (LAPL, 2018a).

The Project Site is 1.3 miles southwest of the El Sereno Branch Library, located at 5226 South Huntington Drive (Google Earth Pro, 2019). This 10,500-square-foot library opened in 2004. Other nearby branches include the Arroyo Seco Regional Library and the Lincoln Heights Branch Library (LAPL, 2018b). Details regarding libraries located in the vicinity of the Project Site (i.e., within 2 miles) are provided below in **Table 4.11.e-1**.

Table 4.11.e-1
NEARBY LIBRARIES STATISTICS

Nearby Libraries Statistics[1]							
Branch	**Address**	**Facility Size (sq. ft.)**	**Collection Size**	**Staffing Level**	**Service Population**	**Distance from Project Site (miles)[2]**	**Adequate Facility Size (YES/NO)[3]**
Arroyo Seco Regional Branch Library	6145 N. Figueroa Street, Los Angeles, CA 90042	14,000	47,546	16.5	78,014	1.9	**NO[4]**
El Sereno Branch Library	5226 S. Huntington Drive, Los Angeles, CA 90032	10,500	58,221	10	23,254	1.3	**NO[5]**
Lincoln Heights Branch Library	2530 Workman Street, Los Angeles, CA 90031	12,912	41,549	9.5	37,134	1.5	**YES[6]**

Source: UltraSystems, 2019
Notes:
[1] Granger, 2018.
[2] Google Maps, 2019.[3] This is based on the following: On February 8, 2007, The Board of Library Commissioners approved a new Branch Facilities Plan. This Plan includes criteria for new Libraries, which recommends new size standards for the provision of LAPL facilities – 12,500 sq. ft. for community with less than 45,000 population and 14,500 sq. ft. for a community with more than 45,000 population and up to 20,000 s.f. for a Regional branch. It also recommends that when a community reaches a population of 90,000, an additional branch library should be considered for the area.
[4] This library is not adequately sized because it is under 14,500 square feet and serves a population of over 45,000 people.
[5] This library is not adequately sized because it is under 14,500 square feet and serves a community of over 45,000 persons.
[6] This library is adequately sized because it is over 12,500 square feet in size for a community with less than 45,000 people.

4.11.e.3 Project Impacts

4.11.e.3.1 Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G, the project would have a significant impact related to library services if it would:

Threshold (a): ***Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for libraries.***

4.11.e.3.2 Methodology

For the purpose of analyzing potential Project impacts on library services and facilities, existing library services in the vicinity of the Project Site were reviewed and identified. A discussion of existing library services within two miles of the Project Site is provided in **Section 4.11.e.2** above. Increased demand for library services and resulting potential impacts as a result of the Project were evaluated based on: 1) the estimated increase in population to be generated by the Project, 2) input received from the LAPL via a response letter received in response to the information request letter sent by UltraSystems (refer to **Appendix N4** for details, 3) a comparison of the future service population to the service population of the LAPL building size standards as set forth in the 2007 Branch Facilities Plan Criteria for new libraries, and 4) a determination if the Project's contribution to the future service population would cause the libraries near the Project Site to operate beyond their service capacity.

4.11.e.3.3 Analysis of Project Impacts

Threshold (a): ***Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for libraries?***

<u>Project Construction</u>

Construction of the Project would result in construction jobs and therefore, construction workers on the Project Site. However, construction jobs created by the Project would not result in substantial population growth in the Project area because construction jobs are temporary in nature. It is anticipated that persons filling construction jobs would be from the local area and as such, construction workers would not move or relocate to the Project area during Project construction. Therefore, Project-related construction workers would not result in an increase in the population within the service area of the three libraries (i.e., Arroyo Seco Regional, El Sereno and Lincoln Heights branch libraries) located within two miles of the Project Site. Additionally, construction workers are likely to use library facilities near their place of residence. It is highly unlikely that the construction workers would use the libraries in the Project vicinity during lunch hours or before the start of their work day or after the end of their work day. Therefore, any increase in the use of library facilities during the construction phase of the Project would be temporary and negligible.

During Phase I of Project construction, fewer persons would be living at the Project Site, compared to existing conditions; however, no impact on library facilities would occur during either Phase I or II of Project construction.

Therefore, construction of the Project would not result in the need for new or expanded library facilities and project construction would result in less than significant impacts on library facilities.

Project Operation

The Project would develop 89 units in the first phase of development and 96 units in the second phase of development, resulting in a total of 185 units with an anticipated total population of 656 residents, of which there would be 435 more residents, compared to January 2019 conditions. These residents could generate an increased demand for library facilities and services from libraries in the Project area. In response to the information request letter sent to the Los Angeles Public Library (Refer to **Appendix N4**), Ms. Aurial Granger provided a letter which states: "…any increase in the residential and/or commuter-adjusted population that is in close proximity to a library has a direct impact on library services with increased demands for library staffing, materials, computers, and information services. Therefore, mitigation measures may be necessary in order to lessen the impact on these services to a level that is appropriate for a given service population in accordance to the February 8, 2007 Board of Library Commissioners approved Branch Facilities Plan."

As described above in **Section 4.11.e.2** above, the LAPL Facilities Plan includes criteria for new Libraries, which recommends new size standards for the provision of LAPL facilities – 12,500 square feet for a community with less than 45,000 population and 14,500 square feet for a community with more than 45,000 populations. It also recommends that when a community reaches a population of 90,000, an additional branch library should be considered for the area.

The two branch libraries and the regional branch library are all relatively close to the Project Site. The nearest library, the El Sereno Branch Library, is 10,500 square feet in size. While smaller than the 12,500-square-foot size standard recommended in the LAPL Branch Facilities Plan, this library is operating at below the design capacity criterion for this facility at less than 45,000 while the current service population of this facility is 23,254. Assuming that all of the Project's 435 net new residents would utilize the El Sereno Branch Library rather than being distributed among all three nearby libraries, the service population of the El Sereno Branch would increase to 23,689. This would still be below the design capacity criterion for this facility and would not trigger the LAPL Branch Facilities Plan threshold (e.g., a service population of 90,000) for requiring a new branch library.

Furthermore, new development generates tax revenues for the City, a portion of which goes to fund City library facilities and services. Also, while LAPL recommends an ad hoc fee of $200 per capita for the population associated with new development be used for staff, books, computers, and other library materials (Granger, 2018 and **Appendix N4**), none of the per capita ad hoc fees requested by LAPL would be applied to the provision of new or physically altered facilities, the construction of which would cause significant environmental effects. Regarding public services, CEQA asks "Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, construction of which could cause significant environmental impacts." As discussed above, the Project's projected population would not exceed the design capacity criterion for LAPL, and as such, would not require a new branch library to be built.

While it is likely that closest LAPL branches currently serving the Project Site would be used by the future residents, it is not expected that any one library or branch would be the focus of the demand. **The Project increase in population and associated demand on existing libraries over existing conditions would be small, and the Project's contribution to library use would not cause substantial degradation of existing facilities or require new or expanded libraries. Impacts related to libraries would be less than significant.**

4.11.e.4 Cumulative Impacts

There are seven cumulative projects that were considered in the cumulative analysis for the proposed Project. The cumulative projects generally consist of infill development including apartments, single-family homes, mixed use, retail, office and school uses (KOA, 2019, Attachment F). As mentioned in the response letter received from LAPL (refer to **Appendix N4**), any increase in the residential population that is in close proximity to a library has a direct impact on library services. The LAPL does not specify any facilities criteria based on employment in a library's service area. Employees generated by the non-residential cumulative projects would be more likely to use library facilities near their places of residence. Students and staff generated by the educational cumulative projects would be more likely to utilize library services provided by the educational facilities. Therefore, the non-residential cumulative projects would not substantially contribute to the Project's cumulative demand for library services.

The estimated population resulting from the cumulative projects identified in **Section 3.0** was calculated using the Citywide Person Per Household factor of 2.83 as published in Census Quickfacts for the City of Los Angeles (2013-2017) (Census Quickfacts, 2019). Based on the cumulative projects considered for cumulative impact analysis in this draft EIR, a total of 157 dwelling units are proposed near the Project Site, in the future. 157 units multiplied by 2.83 persons per household (Census Quickfacts, 2019) results in an estimated cumulative increase in population of approximately 435 persons. When combined with the proposed Project's estimated 435 net new residents, the cumulative projects and the Project would add a total of 880 persons to the Project area. Realistically, the new residents would utilize one of the three libraries (refer to **Table 4.11.e-1** above) based on the location of the cumulative project sites relative to the location of the three libraries. Taking a more conservative approach for the purpose of this analysis, and assuming that all the 880 new residents would utilize the El Sereno Branch Library (which is located closest to the Project Site), rather than being distributed among all three nearby libraries, the service population of the El Sereno Branch library would increase to 24,134. This would still be below the design capacity criterion for the El Sereno Branch library facility and would not trigger the LAPL Branch Facilities Plan threshold (e.g., a service population of 90,000) for requiring a new branch library.

Similar to the proposed Project, the cumulative projects would be required to comply with relevant policies and regulations and would be subject to CEQA review. The cumulative projects would also generate tax revenues for the City, a portion of which goes to fund City library facilities and services. The cumulative projects would also be required to pay the ad hoc fee of $200 per capita for the population associated with new development, to be used for staff, books, computers, and other library materials (Granger, 2018 and **Appendix N4**).

For the reasons discussed above, implementation of the proposed Project along with the cumulative projects considered for the purpose of this analysis would not have cumulatively significant impacts related to library facilities. **Therefore, cumulative impacts related to libraries would be less than significant.**

4.11.e.5 Mitigation Measures

As discussed above in Threshold (a), Project-level and cumulative impacts with regards to library facilities during Project construction and operation would be less than significant. Therefore, no mitigation measures are required.

4.11.e.6 Level of Significance after Mitigation

Project-level and cumulative impacts related to library services and facilities would be less than significant without mitigation.

4.12 Transportation

4.12.1 Introduction

This section analyzes the proposed project's potential impacts regarding transportation. Information in this section, including potential cumulative impacts, is based on findings from the Traffic Impact Study for Housing Authority of the City of Los Angeles Rose Hill Courts Project (Traffic Impact Study), prepared by KOA, dated June 5, 2019 and included in **Appendix O** of this document. The Traffic Impact Study was conducted based on the traffic study guidelines of the City of Los Angeles Department of Transportation (LADOT). Prior to the start of the study, KOA Corporation coordinated with staff from LADOT to obtain consensus on the traffic scope, methodology and assumptions. A Memorandum of Understanding (MOU) was prepared and reviewed by LADOT staff. A copy of the executed MOU is provided in Attachment A of **Appendix O**.

The Traffic Impact Study evaluates the potential Project impacts that were analyzed at the study intersections for the weekday AM and PM peak-hour periods. The study included the analysis of the following traffic scenarios (KOA, 2019, pp. 4-5):

- Existing Conditions (2018): Field work within the Project study area identified conditions at key study area roadways, traffic control and approach lane configuration at each study intersection, and the locations of on-street parking and transit stops. Traffic counts were collected at the study intersections from 7:00 a.m. to 10:00 a.m. and from 3:00 p.m. to 6:00 p.m. on Tuesday, May 15, 2018. These counts were utilized to define existing volumes for the weekday AM and PM peak-hour level of service calculations.

- <u>Existing With-Project Conditions (2018)</u>**:** Project trip generation rates for the affordable housing units were derived from LADOT's Affordable Housing guidelines. Rates for the two onsite managers' units came from the Institute of Transportation Engineers (ITE) Trip Generation, 10th Edition. An Existing With-Project conditions scenario is based on the traffic that is projected for the proposed Project and the traffic count totals.

- <u>Future Pre-Project (Without-Project) Conditions (2025)</u>**:** The full operation of the Project is anticipated to occur by 2025. An annual traffic growth rate of 1% was assumed for the analysis of future baseline conditions. In addition, traffic from area/cumulative projects (approved and pending developments) was included as part of the analysis for future-year 2025 conditions. KOA obtained information from LADOT pertaining to projects that would add measurable volumes to the study intersections.

- <u>Future Post-Project (With-Project) Conditions (2025)</u>**:** The Future With-Project scenario was based upon the future traffic volumes including traffic from ambient growth, area/cumulative projects and the proposed project.

California Senate Bill (SB) 743, which went into effect in January 2014, requires the Governor's Office of Planning and Research (OPR) to change the way public agencies evaluate transportation impacts of projects under CEQA. Under SB 743, the focus of transportation analysis will shift from driver delay, which is typically measured by traffic level of service (LOS), to a new measurement that better addresses the state's goals regarding reduction of greenhouse gas (GHG) emissions, creation of multi-modal transportation networks, and promotion of mixed-use developments. Since 2014, OPR has been developing guidelines and has recommended that vehicle miles traveled (VMT) replace LOS

as the primary measure of transportation impacts. An extension to July 1, 2020 has been provided to allow cities more time to establish a VMT analysis methodology.

On August 9, 2019, LADOT issued guidance on the implementation of the state mandated analysis of vehicles miles travelled. On July 30, 2019, the City of Los Angeles adopted vehicle miles traveled (VMT) as a criteria in determining transportation impacts under the State's California Environmental Quality Act (CEQA). This adoption was required by Senate Bill (SB) 743 and the recent changes to Section 15064.3 of the CEQA Guidelines. To manage this transition LADOT will honor executed MOUs for traffic studies that were processed under the prior LOS based guidelines; however, we strongly recommend that these projects also evaluate VMT as part of their transportation analysis. The VMT analysis will help guarantee the project discloses the appropriate information as required by CEQA in the event that the project does not receive their entitlements prior to July 1, 2020, which is the State's official deadline for required compliance by all projects (KOA, 2019. p. 7).

4.12.2 Environmental Setting

4.12.2.1 Regulatory Framework

Federal

No federal regulations pertain to this issue area.

State

<u>Congestion Management Program</u>

The Congestion Management Program (CMP) was created statewide by Proposition 111 and is implemented locally by the Los Angeles County Metropolitan Transportation Authority (Metro). Proposition 111 (Traffic Congestion Relief and Spending Limitation Act Of 1990) was enacted to update the spending limit on state and local government to better reflect the needs of a growing California population and to provide new revenues to be used to reduce traffic congestion by building state highways, local streets and roads, and public mass transit facilities.

Metro is responsible for planning and managing traffic congestion and coordinating regional transportation policies in Los Angeles County. Metro prepared the 2010 CMP for Los Angeles County, in accordance with § 65089 of the California Government Code (California Legislative Information, 2019h). The CMP is intended to provide congestion relief by linking transportation, land use and air quality planning. The goal of the County is to comply with statutory requirements of the CMP, including monitoring LOS on the CMP Highway and Roadway network, measuring frequency and routing of public transit, implementing the Transportation Demand Management and Land Use Analysis Program Ordinances and helping local jurisdictions meet their responsibilities under the CMP. The CMP also promotes transportation projects eligible to compete for state gasoline tax funds and develops a partnership among transportation decisionmakers to devise appropriate multimodal transportation solutions (Metro, 2010).

The CMP mandates that all development projects and land use decisions requiring preparation of an EIR is subject to the CMP Land Use Analysis Program and shall incorporate into the EIR a CMP Transportation Impact Analysis (TIA) to analyze potential project impacts on CMP monitoring locations and the regional transportation system (Metro, 2010). A specific system of arterial

roadways plus all freeways comprises the CMP system. Per CMP TIA Guidelines, a traffic impact analysis is conducted where (KOA, 2019, p. 30):

- At CMP arterial monitoring intersections, including freeway on-ramps or off-ramps, where the project will add 50 or more vehicle trips during either AM or PM weekday peak hours. If, based on this threshold, the transportation study identifies no facilities for study, no further traffic analysis is required.

- At CMP mainline freeway-monitoring locations, where the project will add 150 or more trips, in either direction, during the either the AM or PM weekday peak hours. If this threshold is not met, then no further traffic analysis is required.

- On CMP transit corridors within one-quarter mile distance from a site.

The CMP also requires that a transit system analysis be performed to determine whether a project adds ridership that exceeds the capacity of the transit system.

Regional and Local

Below are regional and local plans regarding transportation and traffic.

Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

In 2016 SCAG adopted the 2016-2040 RTP/SCS, which presents a vision for the region in 2040. The RTP/SCS is a major planning document for our regional transportation and land use network. It balances the region's future mobility and housing needs with economic, environmental and public health goals (SCAG, 2016, p. 2). The 2016-2040 RTP/SCS identifies mobility, accessibility, sustainability, and high quality of life as the principles most critical to the future of the region. Furthermore, it balances the region's future mobility and housing needs with economic, environmental and public health goals. Key consideration of implementing this plan include social equity and environmental justice. As stated in the 2016-2040 RTP/SCS (SCAG, 2016, p. 15), Senate Bill 375 requires SCAG and other Metropolitan Planning Organizations throughout the State to develop a Sustainable Communities Strategy to reduce per capita greenhouse gas emissions through integrated transportation, land use, housing and environmental planning. Within the 2016-2040 RTP/SCS, the overarching strategy includes plans for High Quality Transit Areas (HQTA), Livable Corridors, and Neighborhood Mobility Areas as key features of a thoughtfully planned, maturing region in which people benefit from increased mobility, increased economic opportunity, more active lifestyles, and an overall higher quality of life. HQTAs are described as areas within 0.5 mile of a well-serviced fixed guideway transit stop or a transit corridor with 15-minute or less service frequency during peak commuting hours. Local jurisdictions are encouraged to focus housing and employment growth within HQTAs. The Project Site is located within an HQTA as designated by the 2016-2040 RTP/SCS (SCAG, 2019a). Refer to **Section 4.9**, Land Use and Planning, of this Draft EIR, for a detailed discussion of the relevant provisions of the 2016-2040 RTP/SCS that apply to the project.

City of Los Angeles General Plan Framework Element and Mobility Element (Mobility Plan 2035)

The Framework Element of the city's General Plan "is a strategy for long-term growth which sets a citywide context to guide the update of the community plan and citywide elements." The Transportation Chapter of the General Plan Framework Element states that "Transportation facilities and policies are integral elements in achieving the vision of the Citywide General Plan Framework Element. A comprehensive strategy of physical and operational improvements and behavioral changes that reduce the number and length of trips generated is necessary to ensure future mobility in the City." (City of Los Angeles Department of City Planning, 2018a)

The Mobility Plan 2035 is an Element of the City of Los Angeles General Plan. It provides the policy foundation for achieving a transportation system that balances the needs of all road users. As an update to the City's General Plan Transportation Element (last adopted in 1999), Mobility Plan 2035 incorporates "complete streets" principles and lays the policy foundation for how future residents interact with their streets. The five goals of this element are: (1) safety first; (2) access for all Angelenos; (3) world-class infrastructure; (4) collaboration, communication, and informed choices; and (5) clean environments and healthy communities. To support the vision of the Citywide General Plan Framework Element, transportation investment and policy will need to follow a strategic plan that builds upon recent achievements. Greater choice and accessibility, made possible by new, multimodal facilities and services as well as improved access to key transportation facilities, will enhance the many economic resources of the City, improve the environments where people live and work, and support greater equity (City of Los Angeles Department of City Planning, 2016, p. 13).

The Mobility Plan refers to the Complete Street Design Guide for street designations and related standards (City of Los Angeles Department of City Planning, 2016, p. 17). The Complete Street Design Guide lays out a vision for designing safe, accessible and vibrant streets in Los Angeles. It is a complement to the Mobility Plan 2035 and provides a compilation of design concepts and best practices that promote the major tenets of Complete Streets—safety and accessibility (City of Los Angeles Department of City Planning, 2016a, Chapter 2).

The Complete Street Design Guide (City of Los Angeles, 2016a, Chapter 2) classifies streets as follows:

- Freeways- High-volume, high-speed roadways with limited access provided by interchanges that carry regional traffic through and do not provide local access to adjacent land uses.
- Arterial Streets- Major streets that serve through traffic and provide access to major commercial activity centers. Arterials are divided into two categories:
    - Boulevards represent the widest streets that typically provide regional access to major designations and include two categories:
        - Boulevard I provides up to four travel lanes in each direction with a target operating speed of 35 miles per hour (mph).
        - Boulevard II provides up to three travel lanes in each direction with a target operating speed of 35 mph.
    - Avenues pass through both residential and commercial areas and include three categories:

- Avenue I provides up to two travel lanes in each direction with a target operating speed of 35 mph.
- Avenue II provides up to two travel lanes in each direction with a target operating speed of 30 mph.
- Avenue III provides up to two travel lanes in each direction with a target operating speed of 25 mph.

- Collector Streets- Generally located in residential neighborhoods and provide access to and from arterial streets for local traffic and are not intended for cut-through traffic. Collector Streets provide one travel lane in each direction with a target operating speed of 25 mph.

- Local Streets- Intended to accommodate lower volumes of vehicle traffic and provide parking on both sides of the street. Local Streets provide one travel lane in each direction with a target operating speed of 15 to 20 mph. There are standard local streets and limited local streets. Standard local streets are continuous and connect to other streets at both ends. The limited local streets lead to a dead-end rather than providing through traffic.

Northeast Los Angeles Community Plan

The Circulation section of the Northeast Los Angeles Community Plan addresses traffic flow and goods movement in the plan area. The Northeast Los Angeles Community Plan Area is bounded by five major freeways: Ventura/Foothill (I-215, SR-134); Golden State (I-5); Glendale (SR-2); San Bernardino (I-10); and the end of the Long Beach Freeway (I-710). It is also bisected by the Pasadena Freeway (State 110). Routes designated as boulevards are Huntington Drive, Mission Road, West Broadway, Eagle Rock Boulevard, and Colorado Boulevard (City of Los Angeles, 2016, p. III-23). The circulation system is adequate to serve its fundamental purposes, as indicated by the relatively small number of severely adversely affected intersections at rush hour. However, a lack of investment in transportation infrastructure in recent years, combined with limited mass transit service, is straining the system when demand is heaviest. This militates against encouraging additional residential density or major commercial, industrial, or institutional developments without requiring mitigations that minimize traffic or enhance the circulation system (City of Los Angeles, 2016, p. III-23).

Below is a list of relevant transportation-related goals, objectives and policies from the Northeast Los Angeles Community Plan:

Goal 10: To the extent feasible and consistent with the Mobility Plan 2035's and community plans' policies promoting multimodal transportation and safety, a system of freeways and streets that provides a circulation system which supports existing, approved, and planned land uses while maintaining a desired LOS at intersections.

- **Objective 10-1**. To the extent feasible and consistent with the Mobility Plan 2035's and the Community Plans' policies promoting multimodal transportation and safety, comply with Citywide performance standards for acceptable LOS and ensure that necessary road access and street improvements are provided to accommodate traffic generated by new development.

- **Policy 10-1.1**. To the extent feasible and consistent with the Mobility Plan 2035's and the Community Plans' policies promoting multimodal transportation (e.g., walking, bicycling, driving, and taking public transit) and safety, maintain LOS for streets and not to exceed LOS "D" for avenues, collector streets, and local streets; not to exceed LOS "E" on boulevards or in the community's major business districts.

  Program: Improve (substandard segments of those arterials) to their designated standard specifications, which are expected to experience heavy traffic congestion by the year 2010.

  Program: Encourage the completion of the following street programs in the City's Capital Improvement Program, where feasible and consistent with the Mobility Plan:

  - Grade Separation at the Valley Boulevard/Mariana Avenue railroad crossing – Design and construct an elevated roadway to relieve traffic congestion and enhance pedestrian safety at the most severely adversely affected intersection in Northeast Los Angeles.

  - San Fernando Road between Avenue 26 and Verdugo Road – Widen to Boulevard standards (three lanes in each direction with two-way left turn lane). There will not be any right-of-way acquisition. The required roadway width will be dedicated when adjacent parcels are developed.

  - York Boulevard between Verdugo Road and Eagle Rock Boulevard – Widen to Avenue II (two lanes in each direction) to minimize disruption to existing residences. There will not be any right-of way acquisition.

  - Figueroa Street realignment at Avenue 62 – Realign with a larger curve radius to facilitate the flow of traffic and to reduce potential accidents at the intersection of Figueroa Street and Avenue 62.

- **Policy 10-1.2**: Design new development projects to minimize disturbance to existing traffic flow with proper ingress and egress to parking.

  Program: Require that major new development projects incorporate Transportation System Management and/or Transportation Demand Management programs and/or transit improvements consistent with the Citywide Land Use Transportation Policy.

- **Policy 10-1.3**: Discourage non-residential traffic flow for streets designed to serve only residential areas by the use of traffic control measures.

  Program: The Plan supports the use of Residential Neighborhood Protection Plans to relieve congestion on collector streets that are expected to experience traffic congestion by the year 2010.

Public Transportation

Goal 11: Develop a public transportation system that improves mobility with convenient alternative to automobile travel.

- **Objective 11-1:** To encourage improved local and express bus service throughout the community and bus routes that connect with freeways and rail facilities.

  - **Policy 11-1.1: Coordinate with Metro to improve local bus service to and within the Northeast Los Angeles plan area.**

    Program: Recommend service improvements of higher capacity buses and/or increased service frequency on:

    Line 81 (Figueroa Street – York Boulevard)

    Line 84 (Cypress Avenue – Eagle Rock Boulevard)

    Line 181 (Hollywood – Glendale – Pasadena – via Yosemite Drive)

  - **Policy 11-1.2:** Encourage the expansion, wherever feasible, of programs aimed at enhancing the mobility of senior citizens, disabled persons, and the transit-dependent population.

    Program: Replace existing bus services along particular routes with new local buses, support the development of a Transit Center and the implementation of new DASH and paratransit lines.

- **Objective 11-2: To increase the work trips and non-work trips made on public transit.**

  - **Policy 11-2.1:** Develop an intermodal mass transportation plan to implement linkages to future mass transit service.

    Program: Develop "transit centers" strategically located to allow easy transfers to other routes and services, employment corridors, shopping centers, and other major community activity centers for residents of the Northeast Los Angeles Community Plan Area, in proximity to the Pasadena Blue Line Station at Avenue 26/Figueroa Street and at Eagle Rock Plaza.

    Program: Implement DASH bus services for Lincoln Heights/Chinatown and Highland Park, to serve the commercial districts and other activity centers in the area.

    Program: Implement community-based "circulators" along collector and local streets to provide convenient access to major rail or bus transit services and activity centers along three routes which should cover the following areas:

    1. North of York Boulevard, east of the Glendale Freeway (SR-2), and south of the Ventura Freeway (SR-134);

    2. Figueroa Street, east of San Fernando Road, and south of Fletcher Drive and York Boulevard; and

    3. South of the Pasadena Freeway (SR-110) and north of Valley Boulevard, east of the Golden State Freeway (I-5).

- **Policy 11-2.2**: Encourage the provision of safe, attractive and clearly identifiable transit stops with user-friendly design amenities.

  Program: The Community Design and Landscaping Guidelines established the Urban Design Chapter Implement Policy.

- **Policy 11-2.3**: Maximize opportunities for affordable housing and pedestrian access adjacent to rail stations.

Non-Motorized Transportation

Goal 13: A system of safe, efficient and attractive pedestrian, bicycle and equestrian facilities.

- **Objective 13-1:** To promote an adequate system of safe bikeways for commuter, school and recreational use.

  - **Policy 13-1.1:** Assure that local bicycle facilities are identified and linked with facilities of neighboring areas of the City.

    Program: The Plan Map identifies the following as bikeway routes: (1) one starting from Riverside Drive and following the bank of the Los Angeles River to Forest Lawn Drive; (2) one beginning at the intersection of Figueroa Street and San Fernando Road, following Pepper Avenue, Cypress Avenue, Eagle Rock Boulevard, and running east and west along Colorado Boulevard; (3) one generally following the Pasadena Freeway and Griffin Avenue; (4) one following Huntington Drive between the City of Alhambra, Boundary and Mission Road; and (5) one following the Department of Water and Power easement within the Taylor Yard. Coordinate with the ongoing revision and updating of the Mobility Plan (2035) to insure implementation of this policy.

  - **Policy 13-1.2:** Encourage the provision of showers, changing rooms and bicycle storage at new and existing non-residential developments and public places.

    Program: Through the inclusion of this policy in the Plan text, the Plan supports the provision of bicycle facilities particularly in pedestrian oriented areas and Transit-Oriented Districts and recommends that this policy be considered, in the revision of the Mobility Plan. In addition, Los Angeles Municipal Code §§ 12.21-A.16 and 91.0705 provide for bicycle parking requirements and employee facilities for showers and lockers.

- **Objective 13-2**: To promote pedestrian-oriented areas, greenways, and pedestrian routes for commuter, school, recreational use, economic revitalization, and access to transit facilities.

  - **Policy:** Identify pedestrian-oriented areas.

    Program: The Plan text and map identifies the locations of pedestrian-oriented areas.

<u>Los Angeles Municipal Code</u>

<u>Construction Traffic:</u> To reduce noise due to construction or excavation work, Section 41.40 of the Los Angeles Municipal Code (LAMC) limits construction activities to the hours from 7:00 a.m. to

9:00 p.m. on weekdays and, for work within 500 feet of occupied residential, from 8:00 a.m. to 6:00 p.m. on any Saturday or national holiday, and prohibits construction activities on Sundays.

Parking: LAMC § 12.21-A.4 identifies parking space requirements for new development. The applicable § 12.21-A.4 parking space requirements for the Project are identified below for apartment land uses:

- 2.0 parking spaces for dwelling units with more than three habitable rooms.
- 1.5 parking spaces for dwelling units with three habitable rooms.
- 1.0 parking space for dwelling units with less than three habitable rooms (City of LA Municipal Code, 2018).

Per LAMC § 12.21, General Provisions, § 12.21A, the project is allowed a 30% reduction in required parking spaces. The Project proposes an Affordable Housing Density Bonus as identified in LAMC § 12.22 A.25: Request is to allow a Density Bonus project with off-menu incentives. The Project would meet the requirements of the Los Angeles Municipal Code using the applicable sections of LAMC 12.21 and 12.22.A25.

Subdivision 16 of Subsection A of Section 12.21 of the Los Angeles Municipal Code states that for all residential buildings containing more than three dwelling units or more than five guest rooms, long- and short-term bicycle parking shall be provided. Long-term bicycle parking shall be provided at a rate of one per dwelling unit or guest room. In addition, short-term bicycle parking shall be provided at a rate of one per ten dwelling units or guest rooms. In such cases, a minimum of two short-term bicycle parking spaces shall be provided.

Vision Zero

Vision Zero Los Angeles is the City of Los Angeles' commitment to eliminate all traffic deaths by 2025. This citywide effort brings together transportation engineers, police officers, advocates, and policymakers to work together towards creating safer streets. The LADOT has identified a network of streets, the High Injury Network (HIN), where strategic investments will have the biggest impact in reducing deaths and severe injuries. The nearest HIN street to the Project Site is North Broadway and Mission Road, approximately 0.8 mile southwest of the Project Site (City of Los Angeles Vision Zero, 2018). The Project study area, as defined through consultation with the LADOT, encompasses seven study intersections, none of which are HIN streets or intersections. As shown in **Attachment D** of the Traffic Impact Study, approximately 25 percent of daily trips (approximately 167 of 656 net daily trips) would be distributed along North Broadway.

4.12.2.2 Study Area

A traffic analysis study area generally comprises those locations with the greatest potential to experience significant traffic impacts due to a project, as defined by the Lead Agency. Generally, a study area includes those intersections that are located:

- Immediately adjacent or in close proximity to a project site;
- In the vicinity of a project site and are documented to have current or projected future adverse operational issues; or

- In the vicinity of a project site and are projected to experience a relatively greater percentage of project-related vehicular turning movements (e.g., at freeway ramp intersections).

The study area for the project was established in consultation with LADOT, based on the above criteria, as well as a review of the project's peak-hour vehicle trip generation, the anticipated distribution of the project's vehicular traffic, and the existing intersections/corridor operations.

Traffic Study Intersections

A total of seven study intersections, as defined through consultation with LADOT, were selected for analysis. Three are signaled intersections, three are all-way stop intersections, and one is a two-way stop intersection. The seven study intersections are listed below, and the locations of these intersections are identified in **Figure 4.12-1**.

(1) Topaz Street and Huntington Drive (signal)

(2) Monterey Road and Huntington Drive (signal)

(3) Monterey Road and Huntington Drive (N)/Browne Avenue (signal)

(4) McKenzie Avenue and Victorine /Browne Avenue (all-way stop)

(5) Boundary Avenue and Mercury Avenue (all-way stop)

(6) McKenzie Avenue/Galena Street and Mercury Avenue (all-way stop)

(7) Huntington Drive (N) and Mercury Avenue (two-way stop)

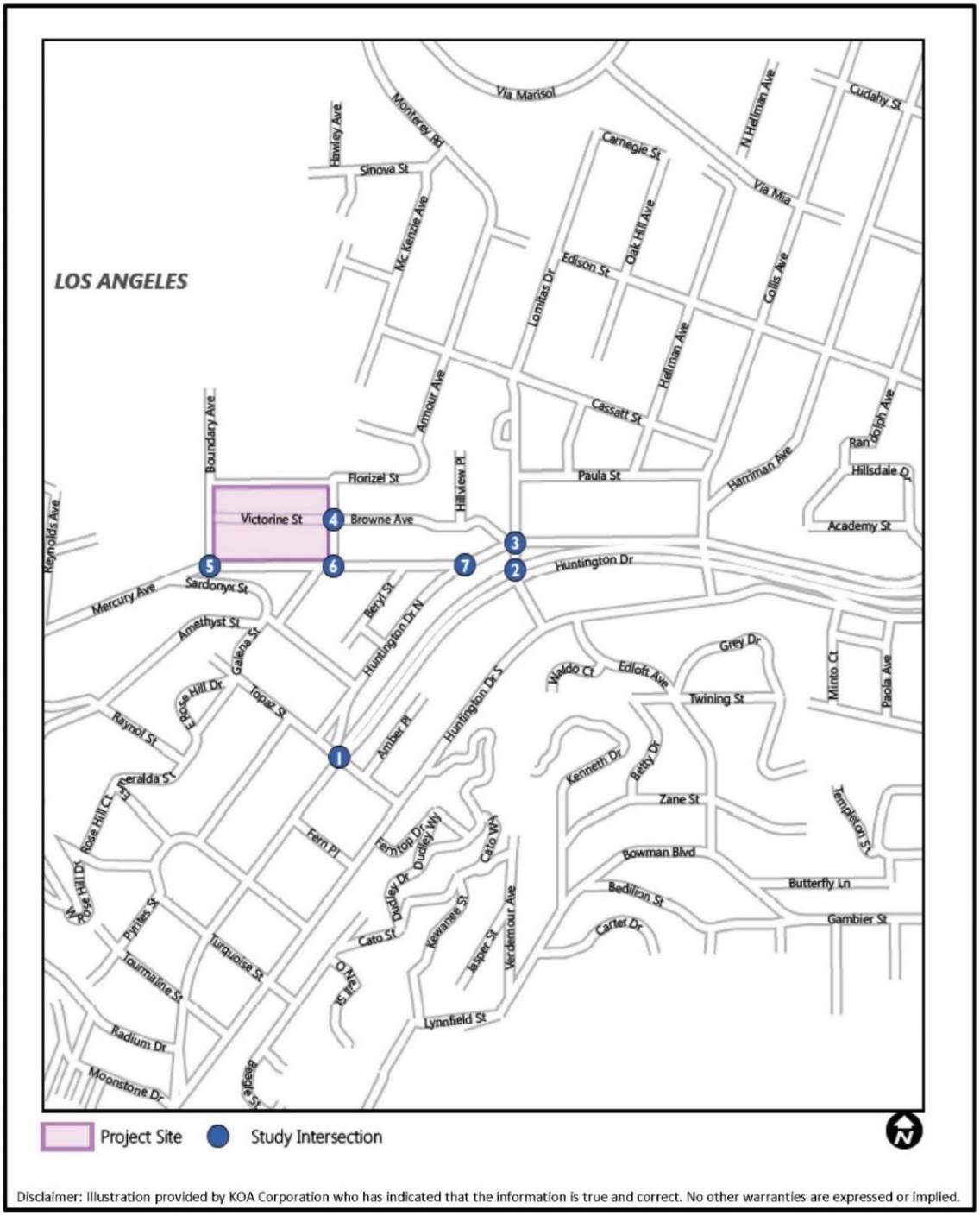
4.12.2.3 Existing Street Systems

Local Streets

The existing street system in the study area, which are described above and shown in **Figure 4.12-1**, consists of local streets, collector streets, boulevards, and avenues which provide sub-regional and local access. The key roadways that traverse the study intersections and serve the Project Site are discussed below. Classifications are based on the City of Los Angeles General Plan Mobility Element (KOA, 2019, p. 8).

- **Browne Avenue** is classified as a Local Street. This roadway provides one travel lane in each direction. On-street parking is permitted on both sides of the roadway from Monterey Road to a point 200 feet west of Hillview Place. West of the latter location, on-street parking is only permitted on the north side of the road. The posted speed limit is 25 miles per hour.
- **Mercury Avenue** is classified as a Collector. This roadway provides one travel lane in each direction. On-street parking is generally permitted on both sides of the roadway. The posted speed limit ranges from 25 to 30 miles per hour.
- **Huntington Drive North** is classified as a Boulevard II (east of Monterey Road), a Collector (from Monterey Road to Mercury Avenue) and a Local Street (west of Mercury Avenue). This roadway provides one travel lane in each direction. On-street parking is generally prohibited on both sides of the roadway in the study area. The posted speed limit is 30 miles per hour.

Figure 4.12-1
TRAFFIC IMPACT STUDY INTERSECTIONS



Disclaimer: Illustration provided by KOA Corporation who has indicated that the information is true and correct. No other warranties are expressed or implied.

Sources: KOA Corporation, July 2018

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Rose Hill Courts Redevelopment

Traffic Impact Study Intersections

- **Huntington Drive** is classified as a Boulevard II. This roadway provides three travel lanes in each direction. On-street parking is generally prohibited on both sides of the roadway. The posted speed limit is 35 miles per hour.
- **Topaz Street** is classified as a Local Street. This roadway provides one travel lane in each direction. On-street parking is generally permitted on both sides of the roadway, with restrictions. The posted speed limit is 25 miles per hour.
- **Boundary Avenue** is classified as a Local Street. This roadway provides one travel lane in each direction. On-street parking is generally permitted on the west side of the roadway and prohibited on the east side. The posted speed limit is 25 miles per hour.
- **McKenzie Avenue** is classified as a Local Street. This roadway provides one travel lane in each direction. On-street parking is generally permitted on both sides of the roadway. The posted speed limit is 25 miles per hour.
- **Monterey Road** is classified as an Avenue II. This roadway provides one to two travel lanes in each direction. On-street parking is generally prohibited on both sides of the roadway south of Huntington Drive North and permitted on both sides of the roadway north of Huntington Drive North. The posted speed limit is 35 miles per hour. The street has a Class III bicycle route.

Regional Transportation System

Regional Access

Primary regional access is provided by State Route 110 (SR-110) via Interstate 5 Freeway (I-5) located approximately one mile west of the project. Major arterials providing regional access to the Project Site vicinity include Huntington Drive, Valley Boulevard/Alhambra Avenue, and N. Eastern Avenue.

Transit System

Public transit services in the vicinity of the Project Site are provided by the Los Angeles County Metropolitan Transportation Authority (Metro). **Table 4.12-1** below describes the public transit lines that operate within the study area. **Figure 4.12-2** shows Los Angeles Metro Line 252 bus stops at the edge of the Project Site.

Table 4.12-1
EXISTING TRANSIT SERVICE IN THE PROJECT AREA

Agency	Line	From	To	Via	Peak Frequency
Metro	78	Downtown LA	South Arcadia	Huntington Drive, Main Street, Las Tunas Drive	10 minutes
Metro	79	Downtown LA	Arcadia	Huntington Drive	10 minutes
Metro	378	Downtown LA	South Arcadia	Huntington Drive, Main Street, Las Tunas Drive	11 minutes
Metro	252	Lynwood	Montecito Heights	California Avenue, State Street, Pacific Boulevard, Soto Street, Huntington Drive, Huntington Drive North, Mercury Avenue,	15 minutes

Agency	Line	From	To	Via	Peak Frequency
				Griffin Avenue	
Metro	256	Commerce	Altadena	Eastern Avenue, Monterey Road, Avenue 64	40 minutes

Table Source: KOA, 2019, Table 2.

Congestion Management Program Facilities

The nearest CMP arterial monitoring intersection is approximately 1.8 miles from the Project Site, at the intersection of the northbound I-710 Freeway off-ramp and Valley Boulevard.

Existing Parking and Access

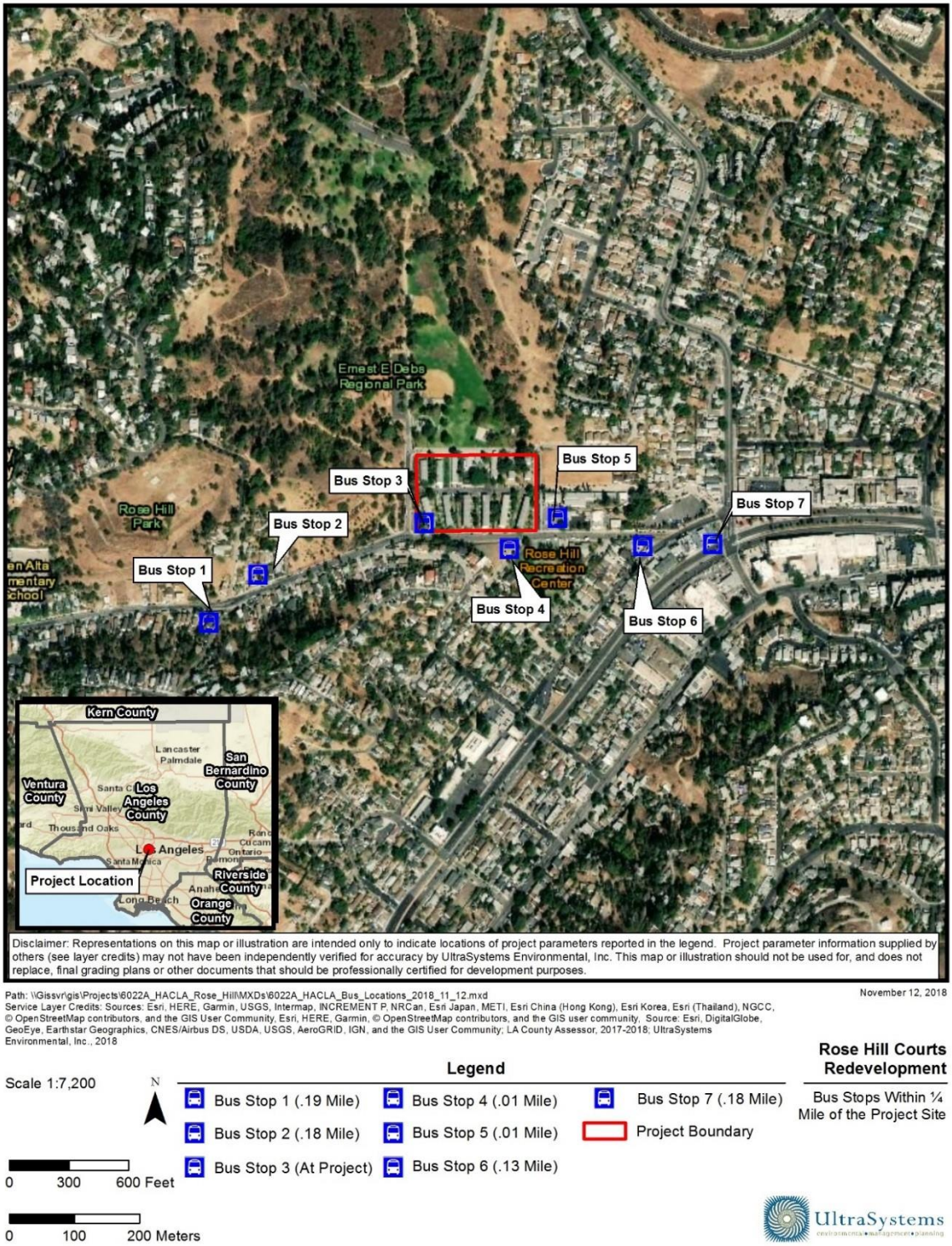
Parking for the existing complex consists of paved surface parking areas located along both sides of Victorine (i.e., a private driveway) that bisects the northern and southern blocks of the Rose Hill Courts complex. Mercury Avenue, a City collector street, provides direct access to the Project Site from Monterey Road and Huntington Drive.

Existing Bicycle and Pedestrian Facilities

No bike lanes are located on any of the streets adjacent to the Project Site (McKenzie Avenue, Florizel Street, Boundary Avenue and Mercury Avenue). Per Appendix D**,** Figure 3 of the 2010 Bicycle Plan, which is a component of the City of Los Angeles General Plan Transportation Element, no existing, funded, or proposed bicycle paths, lanes, or routes are adjacent to or near the Project Site. The nearest bicycle route is located along Griffin Avenue, approximately 1.4 miles west of the Project Site (Google Earth Pro, 2019).

Pedestrian access to and from the Project Site includes the sidewalks along McKenzie Avenue, Florizel Street, Boundary Avenue and Mercury Avenue. Each of these streets is adjacent to the Project Site. The sidewalk on the east side of McKenzie Avenue (across from the Project Site) becomes a crosswalk at Mercury Avenue, allowing pedestrians to safely cross that street to the south. No crosswalks are available for crossing a bordering street directly from the Project Site.

Figure 4.12-2
LOS ANGELES METRO LINE 252 BUS STOPS WITHIN 0.25 MILE OF THE PROJECT SITE



4.12.2.4 Existing Conditions

Analysis Methodology

KOA Corporation (KOA) was retained to analyze the potential traffic impacts associated with the project. Analysis methodology is discussed in Section 1.4 of the *Traffic Impact Study for Housing Authority of the City of Los Angeles Rose Hill Courts Project* (KOA, 2019). The traffic study followed the traffic study guidelines of LADOT. Prior to the start of the traffic study, KOA coordinated with staff from LADOT to obtain consensus on the traffic scope, methodology and assumptions. A Memorandum of Understanding was prepared and reviewed by LADOT staff (KOA, 2019, p. 4).

KOA conducted fieldwork within the Project study area to identify conditions at key study area roadways, identify traffic control and approach lane configuration at each study intersection, and identify the locations of on-street parking and transit stops. Traffic counts were collected at the study intersections during the timeframes of 7:00 a.m. to 10:00 a.m. and 3:00 p.m. to 6:00 p.m. on Tuesday, May 15, 2018. These counts were utilized to define existing volumes for the weekday AM and PM peak-hour level of service calculations (KOA, 2019, p. 4).

Project Trip Generation and Distribution

Project trip generation rates for the affordable housing units were derived from LADOT's Affordable Housing guidelines. The two onsite manager's units used trip rates defined by the Institute of Transportation Engineers (ITE) Trip Generation, 10th Edition. The latter rates (which are typically used in traffic analyses of multi-family housing) are slightly lower than the LADOT affordable housing rates in the AM peak period but considerably higher in the PM peak period (KOA, 2019, p. 4).

Level of Service

For analysis of LOS at signalized intersections, LADOT has designated the following methodology. A facility is "at capacity" (V/C of 1.00 or greater) when extreme congestion occurs. This volume/capacity ratio value is a function of hourly volumes, signal phasing, and approach lane configuration on each leg of the intersection (KOA, 2019, p. 5).

LOS values range from LOS A to LOS F. LOS A indicates excellent operating conditions with little delay to motorists, whereas LOS F represents congested conditions with excessive vehicle delay. LOS E is typically defined as the operating "capacity" of a roadway (KOA, 2019, p. 6).

For stop-controlled intersections, LOS was determined by the Highway Capacity Manual (HCM) unsignalized intersection methodology. This method calculates roadway LOS based on intersection delay, defined as the worst-case approach delay experienced by users of the intersection who must stop or yield to free-flow through traffic (KOA, 2019, p. 6). **Table 4.12-2** defines the LOS criteria applied to the study intersections.

Table 4.12-2
LEVEL OF SERVICE DEFINITIONS

Level of Service	Volume-to-Capacity Definition	Signalized Volume to Capacity Ratio	Unsignalized Delay per Vehicle (seconds)
A	Excellent operation. Free-flow speeds prevail. Vehicles are almost unimpeded in their ability to maneuver within the traffic stream.	0.00–0.600	≤ 10
B	Very good operation. Reasonably free-flow speeds are maintained. The ability to maneuver within traffic is only slightly restricted.	0.601–0.700	> 10 and ≤ 15
C	Good operation. Flow with speeds at or near free-flow speed of the roadway. Freedom to maneuver within the traffic stream is noticeably restricted and lane changes require more care and vigilance on the part of the driver.	0.701–0.800	> 15 and ≤ 25
D	Fair operation. Speeds begin to decline slightly with increasing flows. In this range, density begins to increase somewhat more quickly with increasing flow. Freedom to maneuver within the traffic stream is noticeably limited.	0.801–0.900	> 25 and ≤ 35
E	Poor operation. Operation at capacity with no usable gaps in the traffic stream. Any disruption to the traffic stream has little or no room to dissipate.	0.901–1.000	> 35 and ≤ 50
F	Forced flow. Represents jammed conditions. Backups from locations downstream or on the cross street may restrict or prevent movements of vehicles out of the intersection approach lanes; therefore, volumes carried are not predictable. Potential for stop and go type traffic flow.	Over 1.000	> 50

Source: KOA, 2019, Table 1.

4.12.2.5 Existing Conditions Intersection Levels of Service

Existing Traffic Counts (2018)

KOA Corporation conducted field studies in the Project area to identify conditions on key study area roadways and at intersections; identify traffic control and approach lane configurations at each study intersection; and identify the locations of on-street parking and transit stops (KOA, 2019, p. 4). Traffic counts were collected at the study intersections from 7:00 a.m. to 10:00 a.m. and from 3:00 p.m. to 6:00 p.m. on Tuesday, May 15, 2018. These counts were utilized to define existing volumes for the weekday AM and PM peak-hour level of service (LOS) calculations (KOA, 2019, p. 4). **Table 4.12-3** shows the existing (2018) intersection performance. As seen in this table, all of the study intersections in the Project vicinity are currently operating at LOS D or better during both AM and PM peak hours.

Table 4.12-3
EXISTING INTERSECTION LEVEL OF SERVICE

Study Intersections		AM Peak		PM Peak	
		ICU Or Delay	LOS	ICU Or Delay	LOS
1	Topaz Street & Huntington Drive	0.647	B	0.466	A
2	Monterey Road & Huntington Drive	0.845	D	0.708	C
3	Monterey Road & Huntington Drive North/Browne Avenue	0.464	A	0.659	B

Source: KOA, 2019, Table 3
LOS= Level of Service; V/C = Volume-to-Capacity ratio

4.12.3 Future Without-Project Conditions

This section describes future traffic conditions in the study area with cumulative project trips, but without Project traffic. The Project is anticipated to be completed in the year 2025. For the analysis of background traffic for year 2025, a traffic growth factor of one percent per year was utilized to increase traffic from the existing (2018) traffic volumes.

4.12.3.1 Analysis Methodology

Typically, regional traffic growth that would affect operations at the study intersections by the anticipated Project opening year is added to the study area roadways by applying an ambient/background traffic growth rate to the existing traffic volumes. The full operation of the proposed Project is anticipated to occur by the year 2025. Therefore, an annual traffic growth rate of 1% per year was assumed for the analysis of future baseline conditions. In addition, traffic from area/cumulative projects (approved and pending developments) was included as part of the analysis for future-year 2025 conditions. KOA obtained information from LADOT pertaining to projects that would add measurable volumes to the study intersections.

Related Projects

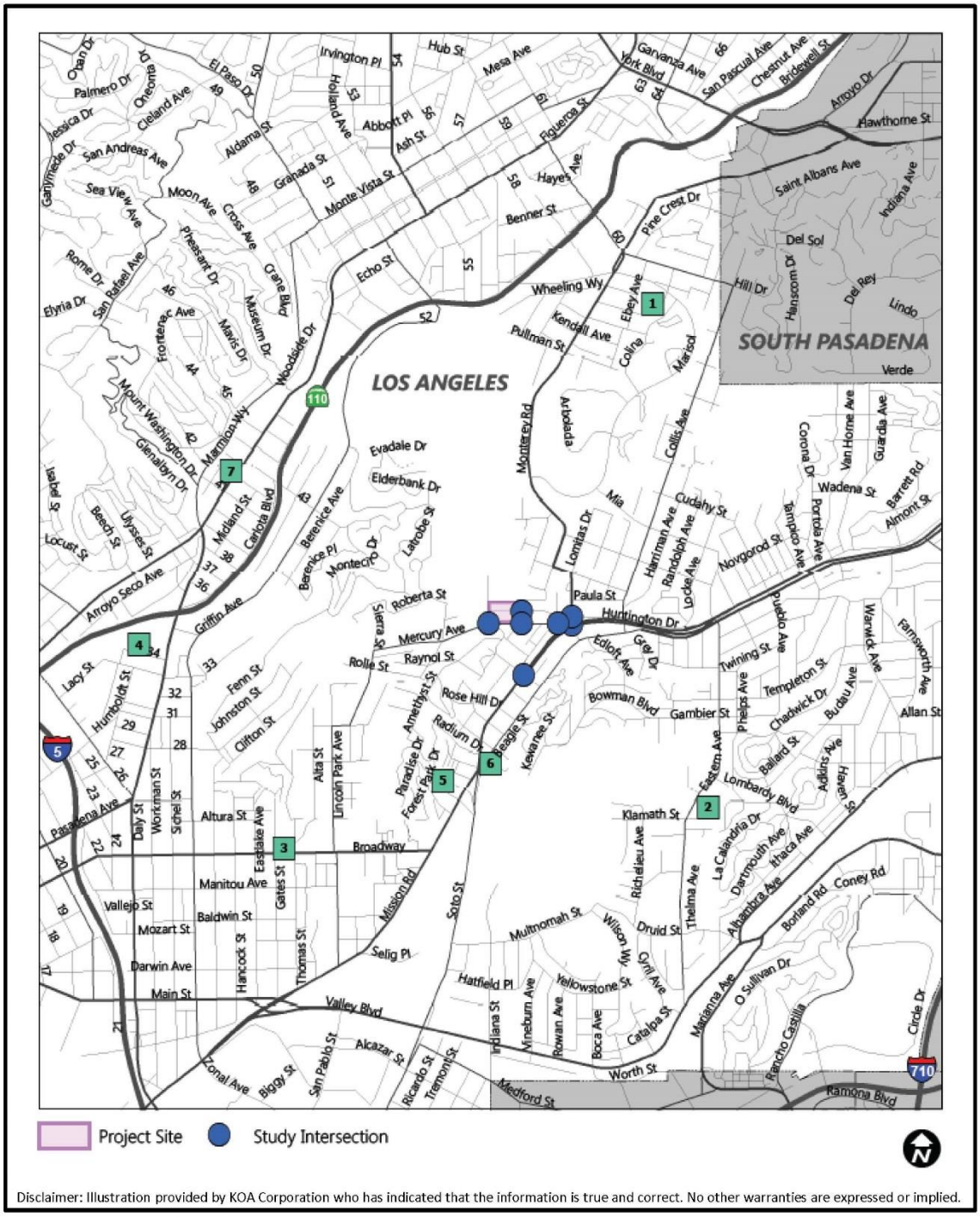
Data on seven projects were obtained from the LADOT Development Review and included in the cumulative traffic analysis. **Table 4.12-4** below provides the trip generation estimates for the cumulative projects identified within the City of Los Angeles (KOA, 2019, p. 19), which are depicted in **Figure 4.12-3**. As detailed in Attachment E of the Traffic Impact Study for the proposed Project (**Appendix O** to this document), the location of cumulative projects was provided by the LADOT. LADOT compiles traffic study information and adds that to their database, as a clearinghouse function. Trips for the related projects are as detailed in Attachment E. Refer to Figure 9 in **Appendix O**, which depicts the cumulative project trip assignment based on AM/PM peak hour information. No future roadway improvements were identified in the Traffic Impact Study prepared for the Project.

Table 4.12-4
CUMULATIVE PROJECT TRIP GENERATION ESTIMATE

ID	Location	Land Use	Intensity	Units	Daily Total	AM Peak Hour			PM Peak Hour		
						In	Out	Total	In	Out	Total
1	625 E Coleman Avenue	Private College	532	students	1,245	93	25	118	33	76	109
2	2520 N Eastern Avenue	Elementary School Apartments Restaurant	530 20 23230	students d.u. k.s.f.	1,363	167	155	322	62	59	121
3	3303 N Broadway	Medical Office	47.300	k.s.f.	1,384	74	20	94	38	103	141
4	167 W Avenue 34	Apartments Retail Office	410 10.000 30.000	k.s.f. k.s.f. k.s.f.	2,128	29	132	161	133	66	199
5	2730 N Onyx Drive	Single Family Homes	31	d.u.	358	8	23	31	23	14	37
6	4208 E Huntington Drive South	Apartments	90	d.u.	544	25	31	56	23	21	44
7	4201 N Figueroa Street	Apartments Retail	16 7.301	d.u. k.s.f.	395	3	11	14	22	13	35
Total					**6,172**	**306**	**372**	**678**	**301**	**276**	**577**

Source: KOA, 2019, Table 6. Location of area projects and trip generation are provided by LADOT.
k.s.f = 1,000 square feet.
d.u. = dwelling unit.

Figure 4.12-3
CUMULATIVE PROJECT LOCATIONS



Sources: KOA Corporation, July 2018

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Rose Hill Courts Redevelopment

Cumulative Project Locations

4.12.3.2 Future Without-Project Intersection Levels of Service

Table 4.12-5 summarizes the intersection performance under future without-Project conditions. Operations at the intersection of Monterey Road and Huntington Drive would degrade to LOS E during the AM peak hour.

Table 4.12-5
INTERSECTION PERFORMANCE: FUTURE WITHOUT-PROJECT CONDITIONS

Study Intersections		AM Peak		PM Peak	
		ICU or Delay	LOS	ICU or Delay	LOS
1	Topaz Street & Huntington Drive	0.722	C	0.531	A
2	Monterey Road & Huntington Drive	0.979	**E**	0.826	D
3	Monterey Road & Huntington Drive North/Browne Avenue	0.567	A	0.751	C

Source: KOA, 2019, Table 7
LOS = Level of Service; Delay = Vehicle delay in seconds shown in X.X format; CMA = Critical movement Analysis shown in X.X XX format.
[1]Unsignalized intersection. Analysis output is in average seconds of delay per approaching vehicle.

4.12.4 Project Impacts

4.12.4.1 Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G, the project would have a significant impact related to public services if it would:

Threshold (a): ***Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities; or***

Threshold (b): ***Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b); or***

Threshold (c): ***Conflict with an applicable congestion management program including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways; or***

Threshold (d): ***Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or***

Threshold (e): ***Result in inadequate emergency access.***

For this analysis the Appendix G Thresholds provided above are relied upon and the methodology and base assumptions used in this analysis were established by LADOT and where LADOT does not prescribe a specific methodology, the criteria identified in the L.A. CEQA Thresholds Guide were used. The L.A. CEQA Thresholds Guide criteria is discussed below as part of the methodology discussion.

4.12.4.2 Methodology

Determination of Traffic Impacts

Traffic impacts are identified if a proposed development will result in a significant change in traffic conditions at a study intersection. A significant impact is typically identified if project-related traffic will cause service levels to deteriorate beyond a threshold limit specified by the overseeing agency. Impacts can also be significant if an intersection is already operating below an acceptable LOS and Project-related traffic will worsen conditions within the specified threshold range (KOA, 2019, p. 26).

The LADOT has established specific thresholds for project-related increases in the volume-to-capacity ratio (V/C) of signalized study intersections. **Table 4.12-6** below shows the increases in peak-hour V/C ratios that are considered significant impacts. For non-signalized study intersections, significant impacts were defined where study intersection operations worsened to or within the LOS F range (KOA, 2019, p. 26). The City of Los Angeles does not provide impact thresholds for unsignalized intersections. Rather, the LADOT Transportation Impact Study Guidelines state that "unsignalized intersections should be evaluated solely to determine the need for the installation of a traffic signal or other traffic control device."

Table 4.12-6
SIGNIFICANT PEAK-HOUR V/C RATIOS

Level of Service	Final V/C	Project Related v/c increase
C	0.701 – 0.800	Equal to or great than 0.040
D	0.801 – 0.900	Equal to or great than 0.020
E and F	0.901 or more	Equal to or great than 0.010

Note: Final V/C is the V/C ratio at an intersection, considering impacts from the project, ambient growth, trips from area/cumulative projects, but without proposed traffic impact mitigations.

Source: KOA, 2019, p. 26.

Construction Traffic

Based on the number of trips estimated to be generated during Project demolition and construction activities, delivery truck trips and construction employee commuting could significantly contribute to traffic within the study area (KOA, 2019, p. 29). The construction trip generation was based on the planned intensity of truck hauling and construction employment intensities during the peak period of construction, when the most construction trips would be generated by trucks and construction crew vehicles (KOA, 2019, p. 29). The construction trip generation intensities will vary based on the construction phase, truck hauling patterns, and construction employment intensities. During the peak traffic period some locations in the study area may be affected by construction traffic, especially the intersection of Monterey Road and Huntington Drive, where for future conditions without the proposed Project the AM peak-hour LOS is E and the PM peak-hour LOS is D. Any incremental impacts that might occur due to Project construction will be temporary, however (KOA, 2019, p. 29).

Project Traffic

Below is a discussion of the traffic that would be generated by the Project in the form of trip generation, trip distribution, and trip assignment.

Project Trip Generation

The project's trip generation was calculated using rates defined by the ITE Trip Generation Manual (10th edition) and LADOT's Affordable Housing Guidelines. The Project trip generation summary is provided in **Table 4.12-8**, includes the current number of units, the planned number of units (183 affordable housing units and two managers' units), and the net difference. As shown in the table below, the Project would generate a net total of 354 daily trips, including 43 vehicle trips during the AM peak hour (17 inbound and 26 outbound trips) and 29 vehicle trips during the PM peak hour (16 inbound and 13 outbound trips) (KOA, 2019, p. 13).

Table 4.12-8
PROJECT TRIP GENERATION

Land Use	No. of Dwelling Units	Daily Trips per Dwelling Unit	AM Peak			PM Peak		
			T/du	In	Out	T/du	In	Out
Trip Generation Rates								
Multifamily Housing (ITE 220)	N/A	7.32	0.46	23%	77%	0.56	63%	37%
Affordable Housing (LADOT Rates)	N/A	4.08	0.50	40%	60%	0.34	55%	45%
Trip Generation Totals - Existing Use to be Demolished								
Affordable Housing	-100	-408	-50	-20	-30	-34	-19	-15
Trip Generation Totals - Proposed Replacement Uses								
Managers' Units – Multi-family	2	15	1	0	1	1	1	0
Affordable Housing	183	747	92	37	55	62	34	28
Total - Proposed minus Existing		**354**	**43**	**17**	**26**	**29**	**16**	**13**

Source: KOA, 2019, Table 4 N/A = Not Applicable
T/du = trips per dwelling unit

Project Trip Distribution

Trip distribution is the process of assigning the directions from which traffic will access the Project Site. Trip distribution is dependent upon the land use characteristics of the project, the local roadway network, and the general locations of other land uses to which project trips would originate or terminate (KOA, 2019, p. 14). Figure 5 in **Appendix O** to this document illustrates the trip distribution percentages at the study intersections used for the traffic impact analysis.

Project Trip Assignment

The final product of the trip assignment process is a full accounting of Project trips by direction and turning movement at the study intersections. Trips were assigned based on distribution inputs to the traffic analysis calculations (KOA, 2019, p. 14). The Project trips for the weekday AM and PM peak hour trips are illustrated on Figure 6 in **Appendix O** of this document.

Existing with-Project Conditions

Based on the traffic that is projected for the proposed Project and the traffic count totals, an Existing with-Proposed Project conditions scenario was analyzed under the California Environmental Quality Act (CEQA)..

Future with-Project Conditions

Based on the future traffic volumes including traffic from ambient growth, area/cumulative projects and the proposed project, the future with-Project conditions were determined and analyzed.

Congestion Management Plan Conformance

As detailed in Section 8 of the Traffic Report prepared for the Project, the CMP was created statewide because of Proposition 111 and was implemented locally by the Los Angeles County Metropolitan Transportation Authority (Metro). This section demonstrates the ways in which this traffic study was prepared to be in conformance with the procedures mandated by the County of Los Angeles CMP. The CMP for Los Angeles County requires that the traffic impact of individual development projects of potentially regional significance be analyzed. A specific system of arterial roadways plus all freeways comprises the CMP system. As discussed previously, a traffic impact analysis is conducted where (KOA, 2019, p. 30):

- At CMP arterial monitoring intersections, including freeway on-ramps or off-ramps, where the Project will add 50 or more vehicle trips during either AM or PM weekday peak hours. If, based on this threshold, the transportation study identifies no facilities for study, no further traffic analysis is required.

- At CMP mainline freeway-monitoring locations, where the Project will add 150 or more trips, in either direction, during the either the AM or PM weekday peak hours. If this threshold is not met, then no further traffic analysis is required.

- On CMP transit corridors within one-quarter mile distance from a site.

The CMP also requires that a transit system analysis be performed to determine whether a project adds ridership that exceeds the capacity of the transit system. The nearest CMP arterial monitoring intersection is approximately 1.8 miles from the Project Site, located at the intersection of the northbound I-710 freeway off-ramp and Valley Blvd. The Project trip generation was adjusted by values defined by the CMP to calculate estimated transit trips. The CMP defines transit mode splits for developments located near or adjacent to a CMP transit corridor, which is defined by stops on a CMP transit line. For residential developments, this rate is defined at 5 percent.

The following calculations were made, based on the defined CMP methodology:

- Project person trips (1.4 times vehicle trips) would be 1,067 on a daily basis, including 130 trips in the AM peak hour and 88 trips in the PM peak hour.

- Applying a five percent mode split for residential uses near CMP transit to the person trips, the Project transit trips would be 53 daily trips, including seven trips in the AM peak hour and four trips in the PM peak hour.

4.12.4.3 Analysis of Project Impacts

Threshold (a): Would the Project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Construction Impacts

During Project demolition and construction activities, delivery truck trips and construction employee commuting could significantly contribute to traffic within the study area. For this reason, an analysis of potential traffic impacts during the Project construction period was analyzed, based on the anticipated number of hauling/delivery trucks and employee vehicle trips (KOA, 2019, p.29). The construction of the proposed Project will occur in two phases, up to the planned Project completion year of 2025. The construction trip generation intensities will vary based on the construction phase, truck-hauling patterns, and construction employment intensities. During the peak traffic period some locations in the study area may be affected by construction traffic, especially the intersection of Monterey Road and Huntington Drive, where for future conditions without the proposed Project the AM peak-hour LOS is E and the PM peak-hour LOS is D (KOA, 2019, p. 29). Mitigation Measure **TRANS-1** is recommended to reduce potential construction-phase impacts to a less than significant level.

<u>Existing With-Project Conditions</u>

This section describes existing traffic conditions at the signalized study intersections with the addition of project-generated traffic. Traffic volumes for these conditions were derived by adding Project trips to the existing traffic volumes. Since the Project will involve closing Victorine at McKenzie Avenue, observed westbound trips at the intersection of McKenzie Avenue and Browne Avenue were diverted to adjacent intersections as part of this scenario (KOA, 2019, p. 17). **Table 5 in KOA's traffic study for the project** summarizes the resulting volume to capacity (V/C) and LOS values at the study intersections for the Existing With-Project conditions. **All of the study intersections would continue to operate at LOS D or better during both AM and PM peak hours** (KOA, 2019, p. 17).

Project Traffic Impacts – Existing With-Project Conditions

Table 9 in KOA's traffic study provides a summary of the Project impacts under existing conditions. Traffic impacts created by the Project were determined by comparing the existing scenario conditions to the Existing With-Project scenario conditions. As shown in Table 9 in KOA's traffic report, **the Project would not create significant traffic impacts at any of the study intersections under Existing With-Project conditions. Therefore, mitigation measures are not recommended under this scenario** (KOA, 2019, pp. 26-27).

Future With-Project Conditions

This section describes future traffic conditions at the signalized study intersections with the addition of project-generated traffic. Traffic volumes for these conditions were derived by adding Project trips to the future Without-Project scenario volumes. Table 10 in KOA's traffic report summarizes the V/C and LOS values at the study intersections under this scenario. The intersection of Monterey Road and Huntington Drive would continue to operate at LOS E during the AM peak hour.

Project Traffic Impacts – Future With-Project Conditions

Table 4.12-9 provides a summary of Project impacts under future conditions. Traffic impacts created by the Project were determined by comparing the Future Pre-Project conditions to the Future With-Project (post-project) conditions.

Table 4.12-9
DETERMINATION OF PROJECT IMPACTS: FUTURE WITH-PROJECT CONDITIONS

Study Intersections		Peak Hour	Future Without Project		Future With-Project		Change in V/C or delay	Sig. Impact?
			CMA or Delay	LOS	CMA or Delay	LOS		
1	Topaz Street & Huntington Drive	AM	0.722	C	0.727	C	0.005	No
		PM	0.531	A	0.533	A	0.002	No
2	Monterey Road & Huntington Drive	AM	0.979	E	0.988	E	0.009	No
		PM	0.826	D	0.831	D	0.005	No
3	Monterey Road & Huntington Drive North/Browne Avenue	AM	0.567	A	0.571	A	0.004	No
		PM	0.751	C	0.753	C	0.002	No

Source: KOA, 2019, Table 10
LOS = Level of Service; V/C = Volume-to-Capacity ratio

Under future with-Project conditions, the proposed Project would not create any significant traffic impacts at the study intersections. Therefore, mitigation measures are not recommended under the future period (KOA, 2019, p. 27).

Neighborhood Intersections

The four intersections included in KOA's traffic study for the examination of potential neighborhood traffic impacts of the Project are either adjacent to the Project Site, or on the route between the site and the nearest arterial. These intersections were analyzed in generally the same manner as the primary study intersections, but these locations are not controlled by traffic signals but by stop signs on the minor approaches. The Highway Capacity Manual unsignalized method was applied, and traffic counts, ambient background growth, area/cumulative project trips, and Project trips were applied in the same manner (KOA, 2019, p. 28).

Table 11 in KOA's traffic report for the proposed Project summarizes the analysis of the included neighborhood intersections. For post-Project conditions, projected westbound trips at the

intersection of McKenzie Avenue and Browne Avenue were diverted to adjacent intersections in order to account for the planned closure of Victorine (KOA, 2019, p. 28).

The delay values in the table are based on average vehicle delay at the minor approaches at the partially-controlled intersection of Huntington Drive North and Mercury Avenue and on average vehicle delay at all approaches for the all-way stop control configurations at the other three intersections (KOA, 2019, p. 28).

As the vehicle delay at these intersections does not reach LOS E or F in the future without- Project or future with-Project periods, additional signal warrant analysis was not conducted. No further analysis of these intersections is necessary (KOA, 2019, p. 29).

Public Transit Service

Public transit services in the vicinity of the Project Site are provided by Metro. As seen in **Table 4.12-1**, Metro bus Lines 78, 79, 378, 252, and 256 operate in the Project area. Metro Line 252 is located adjacent to the Project Site, along Mercury Avenue, with bus stops near the intersections of Mercury Avenue and McKenzie Avenue and Mercury Avenue and Boundary Avenue (Google Earth Pro, 2018). The existing bus stop at the northeast corner of the intersection of Boundary Avenue and Mercury Avenue is anticipated to be protected during Project construction.

Refer to **Figure 4.12-1** for a map showing the locations and distances from the Project Site of bus stops within 0.25 mile of the Project Site. All bus stops in the Project vicinity are for Metro Line 252.

Public Transit Service-During Project Construction

Construction of the Project may result in temporary relocation of bus stops or rerouting of bus Line 252, as well as temporary lane closures, which would affect vehicle flow in the vicinity of the Project Site. **Mitigation measure TRANS-2 is recommended to reduce potential construction-related impacts on transit services to a less than significant level.**

Public Transit Service-During Project Operation

The Project proposes 174 parking spaces and is estimated to result in a net increase of 435 people, compared to existing conditions. As detailed above, five different bus lines operate in the Project area, with Metro Line 252 located adjacent to the Project Site.

Metro Line 252 runs Monday- Friday in the north bound and south bound direction starting at 4:20 a.m. and runs until 9:15 p.m. for the Huntington and Monterey bus stop, near the Project Site. During the weekdays this bus line along stops at the Huntington and Monterey stop 35 times in the north bound direction and 31 times in the southbound direction (Metro Line 252 Schedule, 2019).

The line runs on Saturday in the north bound and south bound direction starting at 5:44 a.m. and runs until 9:15 p.m. for the Huntington and Monterey bus stop, near the Project Site. On Saturdays this bus line along stops at the Huntington and Monterey stop 22 times in the north bound and 22 times in the south bound direction. (Metro Line 252 Schedule, 2019).

The line runs on Sundays and Holidays in the north bound and south bound direction starting at 5:47 a.m. and runs until 9:15 p.m. for the Huntington and Monterey bus stop, near the Project Site.

On Sundays and holidays this bus line along stops at the Huntington and Monterey stop 22 times in the northbound direction and 22 times in the southbound direction (Metro Line 252 Schedule, 2019).

In total, Metro Line 252, which is only one of the five bus lines to operate in the Project area, stops 66 times at the Huntington and Monterey stop Monday-Friday and 44 times a day on Saturdays, Sundays, and holidays. Due to the numerous stops this line makes, in addition to the stops that the other four lines in the Project vicinity make, the addition of approximately 435 people would not create a significant increase in transit demand because the persons from the Project Site using the Metro bus lines would utilize multiple bus lines and a variety of different hours, which would distribute the demand on the bus line such that not all 435 people would need to use the nearest bus stop at any one time.

The Project also proposes alternative transportation by providing long-term and short-term bicycle parking, as described earlier in this section. Therefore, based on the above, **operation of the Project would not affect the transit route or bus facilities, and not conflict with any plans or policies related to these travel modes. After Project construction is complete, the Project would not conflict with existing policies, plans, or programs supporting alternative transportation.**

Parking

Although CEQA Appendix G does not have a threshold for parking impacts, in response to comments during the public scoping period, a discussion of potential parking impacts is included in this section.

Project Construction Parking

During Project construction the Project is anticipated to temporarily reduce the number of on-street parking spaces available. Parking for construction workers would be either onsite or offsite and would only occur during construction hours in the day. It is anticipated that on-street by parking by construction workers would not be prohibited. To ensure that the Project would have less than significant impacts to parking availability during the construction phase, prior to construction activities, the Project applicant will prepare a construction parking management plan that details how parking will be managed during Phase I and Phase II of Project construction. The parking management plan will specify where onsite and offsite parking will be available during both phases of Project construction. Mitigation measure **TRANS-2 is recommended to ensure that temporary Project construction impacts on street parking are reduced to a less than significant level via implementation of a construction parking management plan.**

Project Operation Parking

Under existing conditions, the Rose Hill Courts development has 80 spaces onsite along Victorine for the existing 100 units. For onsite parking this equates to approximately 0.80 parking space per unit.[79] Each new building would have dedicated parking. The Project proposes a total of 174 parking spaces and 185 dwelling units. For onsite parking, this equates to approximately 0.94 parking space per unit.[80] Phase I will construct 55 parking spaces and 89 units, which equates to approximately 0.62 parking space per unit. Phase II will have 119 spaces and 96 units, which equates to 1.24 parking spaces per unit.

79 80 parking spaces/100 units = 0.8 parking space per unit onsite.
80 174 parking spaces /185 units = 0.94 parking space per unit onsite.

As depicted in **Table 4.12-10**, it is estimated that under existing conditions there are between 230 and 261 parking spaces (including onsite and offsite parking) and under the proposed Project there would be between 315 and 344 parking spaces (including onsite and offsite parking).The applicable LAMC § 12.21-A.4 parking space requirements for apartment land uses are: 2.0 parking spaces for dwelling units with more than three habitable rooms; 1.5 parking spaces for dwelling units with three habitable rooms; 1.0 parking space for dwelling units with less than three habitable rooms (City of LA Municipal Code, 2018). Per LAMC § 12.21, General Provisions, § 12.21A, the Project is allowed a 30% reduction in required parking spaces. The proposed Project will increase the number of onsite parking spaces per unit from 0.80 parking spaces per unit to 0.94 parking spaces per unit, which will be an increase of 0.14 parking spaces per unit available onsite. Furthermore, **the proposed Project would increase the total number of onsite parking spaces available. There would be a net increase of 94 parking spaces.[81] Since the number of onsite parking spaces per unit will increase after construction, which is a beneficial impact, the proposed Project would have no adverse impacts to parking during operation.**

Table 4.12-10
PARKING COMPARISON BETWEEN EXISTING AND PROPOSED CONDITIONS

Conditions	Number of units	Number of Onsite Parking Spaces	Number of Onsite Parking Spaces per Unit
Existing Conditions	100	80	0.80
Proposed conditions	185	174	0.94

Bicycle and Pedestrian Access

As stated above regarding existing conditions, no bike lanes are located on any of the streets adjacent to the Project Site. Additionally, there are no existing, funded, or proposed bicycle paths, lanes, or routes adjacent to or near the Project Site. **The Project would have no impact on the nearest bicycle route,** which is located along Griffin Avenue, approximately 1.4 miles west of the Project Site (Google Earth Pro, 2018).

The existing pedestrian access to and from the Project Site (the sidewalks along McKenzie Avenue, Florizel Street, Boundary Avenue and Mercury Avenue) would not be affected by the project. Curb cuts would be added for the driveways proposed along Mercury Avenue (two driveways), Florizel Street (three driveways), and McKenzie Avenue (one driveway), however, pedestrian access would not be significantly affected, as sidewalks would not be removed as part of the project. The crosswalk located along the sidewalk along McKenzie Avenue to Mercury Avenue would not be altered.

After Project construction is complete, with the exception of curb cuts necessary for driveways, the Project would not adversely affect sidewalks adjacent to the Project Site. **Therefore, pedestrian access to the Project Site would not be significantly affected upon Project completion.**

81 174 proposed parking spaces minus the 80 existing parking spaces equals a net increase of 94 parking spaces.

As described above, Vision Zero Los Angeles is the City of Los Angeles' commitment to eliminate all traffic deaths by 2025. LADOT has identified a network of streets, the HIN, where strategic investments will have the biggest impact in reducing deaths and severe injuries. The nearest HIN intersection to the Project Site is North Broadway and Mission Road, approximately 0.8 mile southwest of the Project Site (City of Los Angeles Vision Zero, 2018). As shown in **Attachment D** of the Traffic Impact Study, approximately 25 percent (approximately 89 daily trips) would be distributed along North Broadway. The Project would be required to conform to City sight-line standards and sidewalk design, and other similar requirements to ensure pedestrian safety. The Project does not propose any bus, van, or shuttle loading facilities. Improving bus transit for the Project Site (i.e. Shuttle/Access, DASH, and Metro Bus Route 252) is outside the scope of the project. The Project Site has no publicly accessible throughways, and no bicycle paths are directly adjacent to the site (Google Earth Pro, 2018). **During construction activities, the Project has the potential to affect sidewalk accessibility. However, with implementation of mitigation measure TRANS-3 provided in Section 4.15.6. below, impacts would be reduced to a less than significant level. Therefore, with mitigation the Project would not conflict with policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities and impacts would be less than significant.**

Threshold (b): Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Section 15064.3, Determining the Significance of Transportation Impacts, of the CEQA Guidelines describes specific considerations for evaluating a project's transportation impacts. Section 15064.3, subdivision (b) includes criteria for analyzing transportation impacts. For land use projects, "Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within 0.5 mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact" (CEQA Guidelines § 15064.3).

The analysis provided in the traffic report prepared for the Project utilizes volume to capacity ratios and level of service standards to determine Project significance because the requirement to use vehicle miles traveled was not mandatory at the time the traffic report was written. However, **Section 4.15**, Energy, of this document discusses vehicles miles traveled (VMT) during both the construction and operational phases. Onroad VMT for each construction subphase and each of the three trip types were calculated from results of the CalEEMod modeling. As detailed in **Table 4.15-2 of the Energy Section**, total VMT are projected to increase by about 1,181,329 vehicle-miles per year. However, VMT per capita are projected to decrease substantially as result of the project. Per-capita VMT will be about 37% lower. As a result, per-capita consumption of gasoline and diesel fuels will decrease by a comparable amount. Refer to **Section 4.15** for details. **Since the Project is located within a high-quality transit corridor and public transportation would still be available to the residences at the site, impacts to transportation based on vehicle miles traveled are expected to be less than significant.**

Threshold (c): Would the Project conflict with an applicable congestion management program including, but not limited to level of service standards and travel

demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Analysis of Threshold (c) has been added because the City of Los Angeles has not adopted vehicle miles traveled, per Threshold (b) above. The nearest Congestion Management Program (CMP) arterial monitoring intersection is approximately 1.8 miles from the Project Site, located at the intersection of the northbound I-710 freeway off-ramp and Valley Boulevard (KOA, 2019, p. 30). Based on the trip generation defined in **Table 4.12-8**, it is not expected that 50 or more new Project trips per hour would be added at this CMP intersection. Therefore, no further analysis of potential CMP impacts is required.

The nearest freeway monitoring station is located on the SR-110 freeway, at Pasadena Avenue, which is about 1.2 miles from the Project Site (KOA, 2019, p. 30). Based on the trip generation defined in **Table 4.12-8**, the Project is not expected to add more than 150 trips at this location. Therefore, no further analysis of potential CMP impacts is required.

Metro Bus Line 252 has stops on Mercury Avenue, at the south side of the Project Site. Metro Bus Line 256 has stops in the vicinity of the Monterey Road/Huntington Drive intersection, at an approximate 1,200-foot walking distance (or approximately one-quarter of a mile) from the Project Site. The Metro bus service on Huntington Drive, provided by joint local and limited-service line 78/79/378, is the closest CMP transit route as designated by Metro to the site (KOA, 2019, p. 30-31).

The Project trip generation without trip generation credits is 762 daily trips, including 93 vehicle trips during the AM peak hour and 63 vehicle trips during the PM peak hour. The Project trip generation was adjusted by values defined by the CMP to calculate estimated transit trips. The CMP defines transit mode splits for developments located near or adjacent to a CMP transit corridor, which is defined by stops on a CMP transit line. For residential developments, this rate is defined at 5 percent (KOA, 2019, p. 31).

The following calculations were made, based on the defined CMP methodology:

- Project person trips (1.4 times vehicle trips) would be 1,067 on a daily basis, including 130 trips in the AM peak hour and 88 trips in the PM peak hour.

- Applying a five percent mode split for residential uses near CMP transit to the person trips, the Project transit trips would be 53 daily trips, including seven trips in the AM peak hour and four trips in the PM peak hour.

It is anticipated that the existing transit service in the Project area would be able to accommodate the Project generated transit trips, based on the multiple transit lines available in the area and the low overall transit trip demand of seven or fewer peak-hour trips anticipated for the proposed project. **Therefore, given the number of transit trips generated by the -and the existing transit routes in the Project vicinity, it is concluded that the existing public transit system would not be significantly impacted by the proposed Project** (KOA, 2019, p. 31).

Threshold (d): Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Access to the Project Site would be provided via two driveways along Mercury Avenue, one driveway along Mackenzie Avenue, and three driveways along Florizel Street. The Project would comply with all applicable requirements of the City of Los Angeles regarding traffic-related design features and would be designed to provide adequate lines of sight, proper emergency access, and vehicle flow within the Project Site. **Therefore, the Project would not increase hazards due to a design feature, and no impact would occur.**

Threshold (e): Would the Project result in inadequate emergency access?

Emergency Access – Project Construction

Based on the number of trips estimated to be generated during Project demolition and construction activities, delivery truck trips and construction employee commuting could significantly contribute to traffic within the study area (KOA, 2019, p. 29), which could in turn impact emergency access to the Project Site. The construction trip generation intensities will vary based on the construction phase, truck hauling patterns, and construction employment intensities. During the peak traffic period some locations in the study area may be affected by construction traffic, especially the intersection of Monterey Road and Huntington Drive, where for future conditions without the proposed Project the AM peak-hour LOS is E and the PM peak-hour LOS is D (KOA, 2019, p. 29).

The TIA prepared for the Proposed Project states: "It is recommended that the construction manager schedules truck traffic and employee shifts to avoid creating trips during the peak traffic periods, as is feasible for construction operations. All measures including identified truck routes and designated employee parking areas must be detailed within a Construction Management Plan to be reviewed and approved by LADOT before the start of construction. These measures would reduce construction impacts on the area roadway network (KOA, 2019, p. 29). Mitigation Measure **TRANS-1** below pertains to the scheduling of truck traffic and employee shifts to avoid creating trips during the peak traffic periods. Mitigation Measure **TRANS-1** below would reduce construction impacts on the area roadway network (KOA, 2019, p. 29). **Mitigation measure TRANS-1 would reduce this potential impact to the intersection of Monterey Road and Huntington Drive to a less than significant level.**

Emergency Access – Project Operation

The Project site plan will be reviewed by the Los Angeles Fire Department and the Project complies with all emergency access and sight line requirements. **Therefore, the Project would not result in inadequate emergency access during operation and no impacts would occur.**

4.12.5 Cumulative Impacts

Construction

Other projects proposed in the City of Los Angeles would be required to implement mitigation measures (as warranted) for potential short-term construction impacts regarding potential conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Cumulative projects would be required to reduce potential

construction-phase impacts regarding conflict with plans/programs. **Therefore, Project impacts would be less than cumulatively considerable.**

Operation

Other projects proposed in the City of Los Angeles would be required to implement mitigation measures (as warranted) for potential long-term construction impacts regarding conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Cumulative projects would be required to reduce potential operational impacts regarding conflict with plans/programs. **Therefore, Project impacts would be less than cumulatively considerable.**

Emergency Access

The proposed Project as well as other projects proposed in the City of Los Angeles would be required to implement mitigation measures (as warranted) for potential short-term and long-term impacts from projects. It is anticipated that cumulative projects, just as with the proposed Project, would be required to provide adequate emergency vehicle access to project sites both during the short-term construction period and long-term operational phases. Therefore, impacts would not be cumulatively considerable.

4.12.6 Mitigation Measures

TRANS-1 Prior to the commencement of Project construction, the Project Applicant for the Project will submit a detailed Construction Management Plan (with copy to HACLA) to be reviewed and approved by LADOT. In the Construction Management Plan, it will specify that the Construction Manager will schedule truck traffic and employee shifts to avoid creating trips during the peak traffic periods, as is feasible for construction operations. All measures including identified truck routes and designated employee parking areas must be included in the Construction Management Plan.

TRANS-2 Prior to issuance of a demolition permit, the Project applicant shall submit a construction parking management plan to the City of Los Angeles (with copy to HACLA) that details how parking will be managed during Phase I and Phase II of Project construction. The parking management plan shall specify where onsite and offsite parking will be available during both phases of Project construction. This plan shall be made available to the City in both hard copy and electronic format so that it can be disseminated to persons who request this information during construction of the project.

TRANS-3 Prior to issuance of a demolition permit, the Project applicant shall submit to the City of Los Angeles Planning Department (with copy to HACLA) and the Planning Department shall approve a construction management schedule. The schedule shall include a street closure plan to ensure the continued flow of vehicle traffic (including bus traffic, and potential temporary bus stop closure or relocation along Mercury Avenue), pedestrian traffic, and bicycle traffic during temporary street closures during both Phase I and Phase II of Project construction.

4.12.7 Level of Significance After Mitigation.

Implementation of mitigation measure TRANS-1 would result in less than significant construction traffic-related impacts to the intersection of Monterey Road and Huntington Drive.

With implementation of mitigation measures **TRANS-2 and TRANS-3,** during the Project construction phase, the Project would have less than significant temporary construction-related impacts to traffic and transportation. **Therefore, with mitigation the Project would not conflict with policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities and impacts would be less than significant.**

With implementation of mitigation measure **TRANS-2** during the Project construction phase, the Project would have less than significant temporary construction-related parking impacts.

Implementation of mitigation measure **TRANS-3** would result in less than significant impacts on vehicle, pedestrian, and bicycle flow, during the construction phase of the project.

4.13 Tribal Cultural Resources

4.13.1 Introduction

This section addresses potential impacts to tribal cultural resources (TCRs) and provides an analysis of the project's potential impacts on TCRs. The evaluation of potential impacts to TCRs is based on both consultation and coordination with Native American tribes traditionally and culturally affiliated with the proposed project site as well as a Sacred Lands Files (SLF) records search conducted by the Native American Heritage Commission (NAHC). Information in this section is also based in part on the Phase I Cultural Resources Survey for the Rose Hill Courts Redevelopment Project, Los Angeles, Los Angeles County, California, prepared by UltraSystems Environmental Inc. (UltraSystems, 2019b), included as **Appendix I1** of this document.

Tribal cultural resources are defined by the Public Resources Code (PRC) Section 21074 as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either included or determined to be eligible for inclusion in the California Register of Historical Resources (CRHR) or included in a local register of historical resources, or a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant. A cultural landscape that meets these criteria is a TCR to the extent that the landscape is geographically defined in terms of the size and scope of the landscape. Historical resources, unique archaeological resources, or non-unique archaeological resources may also be TCRs if they meet these criteria.

4.13.2 Environmental Setting

4.13.2.1 Regulatory Framework

The treatment of TCRs is governed by state laws and guidelines. There are specific criteria for determining whether prehistoric sites or objects associated with TCRs are significant and thus protected by law. Some resources that do not meet archaeological cultural significance criteria may be considered significant by state criteria for TCRs. The laws and regulations seek to mitigate project impacts on significant TCRs.

Federal

There are no federal laws that pertain to this issue area.

State

<u>Unique Archaeological Resources under CEQA</u>

CEQA requires the lead agency to consider whether the project will have a significant effect on unique archaeological resources and to avoid unique archaeological resources when feasible or mitigate any effects to less than significant levels per California Public Resources Code (PRC) § 21083.2. CEQA (PRC § 21083.2(g)) defines a unique archaeological resource as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1) Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information;

2) Has a special and particular quality such as being the oldest of its type or the best available example of its type;

3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.

California Assembly Bill 52 (Native American Consultation and Tribal Resources)

AB 52 creates a new category of environmental resources that must be considered under CEQA: "tribal cultural resources." The legislation imposes requirements on local agencies for consultation with California Native American tribes regarding projects that may have potential impacts on TCRs.

As detailed in Public Resources Code Section 21074:

(a) "Tribal cultural resources" are either of the following:

> *(1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:*
>
> > *(A) Included or determined to be eligible for inclusion in the California Register of Historical Resources.*
> >
> > *(B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.*
>
> *(2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.*

(b) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

(c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a "nonunique archaeological resource" as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

Under Public Resources Code Section 21080.3.1, prior to release of an EIR the Lead Agency is required to begin consultation with a California Native American Tribe that is traditionally and culturally affiliated with the geographic area of the proposed project if:

1) *the tribe requested to the lead agency, in writing, to be informed by the lead agency through formal notification of proposed projects in that geographic area that is traditionally and culturally affiliated with the tribe; and*

2) *the tribe responds, in writing, within 30 days of receipt of the formal notification, and requests the consultation.*

The lead agency shall begin the consultation process within 30 days of receiving a California Native American tribe's request for consultation. Public Resources Code § 65352.4 defines consultation as "the meaningful and timely process of seeking, discussing, and considering carefully the views of others, in a manner that is cognizant of all parties' cultural values and, where feasible, seeking agreement. Consultation between government agencies and Native American tribes shall be conducted in a way that is mutually respectful of each party's sovereignty. Consultation shall also recognize the tribes' potential needs for confidentiality with respect to places that have traditional tribal cultural significance."

Public Resources Code Section 21080.3.2(a) states: "As a part of the consultation pursuant to Section 21080.3.1, the parties may propose mitigation measures, including, but not limited to, those recommended in Section 21084.3, capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource." Public Resources Code Section 21084.3 states: "Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource." Consultation is considered concluded when the parties agree to measures to mitigate or avoid a significant effect on a TCR, or a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached.

Human Remains

Section 15064.5 of the State CEQA Guidelines specifies procedures to be used when Native American remains are discovered. These procedures are discussed within PRC § 5097, as well as in the California Health and Safety Code § 7050.5.

California Public Resources Code 5097.98

Public Resources Code Section 5097.98 addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and establishes the NAHC to resolve disputes regarding the disposition of such remains. It has been incorporated into § 15064.5(e) of the State CEQA Guidelines.

California Health and Safety Code

The California Health and Safety Code § 7050.5 states that if human remains are discovered during construction on a project site, no further disturbance shall occur until a county coroner makes a determination of origin and disposition of the remains. If the county coroner determines the remains are not subject to his or her authority and recognizes the remains to be those of Native American, the county coroner must contact the NAHC within 24 hours.

Local

There are no local regulations that pertain to this issue area.

4.13.2.2 Existing Conditions

The project lies within the City of Los Angeles, Los Angeles County, in southern coastal California. Los Angeles is located on a hilly coastal plain with the Pacific Ocean as its southern and western boundaries. The city stretches north to the foothills of the Santa Monica Mountains and is bounded

by the San Gabriel Mountains to the east. Numerous valleys, hills, coastlines and riverbeds characterize the region, making it an area of diverse micro-climates.

The Northeast Los Angeles Community area contains a population of 167,674 (2000 census), while the El Sereno neighborhood itself is the home to 43,766 as of the 2000 census. This community rests in the San Rafael Hills northeast of downtown Los Angeles, which range in height from 400 to 1,788 feet. Rose Hills Court itself lies at an elevation of approximately 480 to 520 feet, sloping to the east, and is just over three and a half miles northeast of the Los Angeles City Hall. The project site is bounded by Mercury and McKenzie Avenues that contain single and multiple family residences, and Our Lady of Guadalupe Roman Catholic Church and elementary school. Across Florizel Street and Boundary Avenue to the west and north is the semi-developed Ernest E. Debs Regional Park.

4.13.3 Project Impacts

4.13.3.1 Thresholds of Significance

Pursuant to State CEQA Guidelines Appendix G, the project is assessed under the following significance thresholds:

Threshold (a): ***Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:***

(i) ***Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code § 5020.1(k); or***

(ii) ***A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resource Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.***

4.13.3.2 Methodology

Ethnographic Record Review

The downtown Los Angeles area, situated among a foothill transition zone and the Los Angeles River traversing the middle, was an ideal location for Native settlements (McCawley, 1996:57). The village of *Yaanga* was situated near the old Plaza of Los Angeles approximately one and a half miles southwest of the Rose Hill Courts Project site at the edge of the plain, and a village named *Geverobit* was apparently also very near this same location by the river. The Tongva community of *Maawnga* was set on the west edge of the Cahuenga Hills to the west (McCawley, 1996:55). In the Rose Hills area itself, "on the road from San Gabriel to Los Angeles" according to Mission San Gabriel priest Fr. José Zalvidea, was the village of *'Ochuunga*, a name derived from *'ochuur*, "wild rose" in Tongva (also spelled *Otsungna*). A trail and trade route through a canyon in the hills connected the valleys from the main plain inland to San Gabriel linking villages along the way; this trail was eventually

transformed into Mission Road and Huntington Drive, passing approximately 800 feet east of Rose Hill Courts.

Evidence for the village of "*Ochuunga"* is seen in the sacramental registers of Mission San Gabriel, where from 1775 through 1813 there were 146 village inhabitants baptized and, in large part, brought to the mission grounds to live, and another five residents came to Mission San Fernando in 1801 and 1805 (ECPP, 2019). This population makes it one of the larger Gabrielino villages during the Contact Period. The location of this village within the Rose Hills area is witnessed from the fact that the rancho for this region was termed *Rancho Rosa de Castillo*, both the village and the rancho being named for the abundance of the native rose bush (*Rosa california*) that flourished in the well-watered canyons here. This rancho, situated between the Los Angeles Pueblo lands and those held by Mission San Gabriel, was granted to Juan Bastillo in 1831 who used it for cattle ranching. Encompassing approximately 3,300 acres, it covered almost five square miles. Bastillo built an adobe casa where the California State University Los Angeles campus currently sits, approximately two miles southeast of the Rose Hill Courts Project site.

Attempting to more exactly locate the village of *Otsungna* poses problems due to the lack of clear and precise information. Local ethnographic works by major researchers such as A. L. Kroeber (1925), Bean and Smith (1978) and Johnson (2006) do not attempt to indicate the village on their maps of Gabrielino territory. However, the placename itself does make the location likely to have been situated within the same named Rose Hills and the creek here of Rio Rosa de Castillo. It would have been situated on the rancho named for it, but that covers approximately five square miles. Often a ranchero would situate his hacienda on the most favorable plot of land of the estate with flat, well-watered surroundings. It was also common for this location to have been the site of a prominent Native American village, and this may have been the case with *Otsungna*. Interviews with members of the Gabrielino community in the early 20th century by anthropologist/linguist John P. Harrington (1986:Reels 102-105) elicited memories of the village name and location. One of Harrington's consultants, identified as "Z" (for José Maria Zalvidea, not to be confused with the earlier Franciscan priest) was familiar with the term *'utšúvit* (/ts/ for the "ch" sound, and "-vit" meaning a person from a place); Z placed the village "on the road [traditional trail] from San Gabriel to Los Angeles, about three miles from San Gabriel" (Harrington 1986:Rl 102, Fr 326-R). Measuring this distance on a map from Mission San Gabriel southwest along Mission Road toward Los Angeles, this would place *Otsungna* in the west edge of Alhambra adjacent to El Sereno, about two miles east of the project site. Another consultant identified as "F" (Feliz) pronounced the name as *'otšúvit* (/tš/ for "ch"), stating that "there is a big matanza (slaughter house [or field]) there now at the site of 'otsuvit, about half-way between Los Angeles and San Gabriel. Railroad and wagon road pass by Rose de Castilla" (Harrington, 1986:Rl 102, Fr 326-R). Railroad tracks still parallel Mission Road in its south side, and half-way between Mission San Gabriel and old downtown Los Angeles along this route also places the village site at the east edge of the community of El Sereno and near the border of Alhambra, approximately two miles east of the project site. Considering that a rancho *matanza* would require relatively flat, open space with water nearby, such topography exists in this immediate area where there is a railroad yard at a locality named Aurant (USGS, 1966), along where the creek had been and just a half mile north of the CSU Los Angeles campus that contains the rancho hacienda. The convergence of these elements match what would be expected for the trail, creek, matanza and rancho hacienda, and match the descriptions provided by Harrington's Gabrielino consultants on the general location of the village of *Otsungna* relative to Mission San Gabriel and old downtown Los Angeles. The general location of the creek, traditional trail and Contact Period village were along what is now Mission Road, 1.5 miles southeast of the project site.

The recollections of Harrington's Gabrielino consultants Zalvidea and Feliz were correlated with modern maps of the area, and combined with what is known of the Rancho Rosa de Castilla and the customary arrangement of features on Californio ranchos. This analysis lead to the suggestion that the probable location of *Otsungna* was somewhere along a wide space along the canyon connecting Mission San Gabriel with old downtown Los Angeles, which now contains Mission Road, at the eastern edge of El Sereno and northwest of the CSU Los Angeles campus. This location is approximately 1.5 to 2.25 miles southwest of the Rose Hill Courts Project site.

Similarly, in a report for Caltrans' State Route-710 North project, the cultural consultation firm LSA conducted its own analysis of evidence for the location of *Otsungna* village. LSA determined that the most likely location of *Otsungna* was in the vicinity of the northern portion of CSU Los Angeles (McLean, 2017:8, Figure 4 and Figure 6). This is within 500 feet of the possible location suggested by the present study, and even farther to the southwest from the Rose Hills Courts.

It would be expected that a Contact Period village site such as *Otsungna*, given the size of its population, would leave considerable archaeological material in the ground. There is no evidence, however, for such a prehistoric or Contact Period habitation at the Rose Hill Courts Project site and adjacent parcels as determined by the cultural resources report (**Appendix I1**).

Phase I Cultural Resources Survey for Project

Information in this section is from the Phase I Cultural Resources Survey conducted for the proposed project (refer to **Appendix I1** to this Draft EIR). The cultural resources inventory and related archival research included a background archaeological records check (archival research) at the SCCIC, California State University, Fullerton, a SLF search request to the NAHC, and the list of local Native American entities to contact from the NAHC. The field survey conducted for this project observed no prehistoric or historic artifacts or features. The potential for subsurface cultural and or historical deposits is minimal based on the above findings.

Records Review

<u>Sacred Lands File Review</u>

The NAHC maintains a confidential SLF that contains sites of traditional, cultural, or religious value to the Native American community. On April 25, 2018, Mr. O'Neil submitted a request to the NAHC via email, fax and mail for a SLF search within the 0.5-mile project buffer. The results of the search request were received April 26, 2018, at the office of UltraSystems from Ms. Gayle Totton, Associate Governmental Program Analyst. The NAHC letter stated that "A record search of the NAHC *Sacred Lands File* was completed for the area of potential effect (APE) referenced above with <u>negative</u> results [emphasis in the original]."

<u>California Historical Resources Information System Review</u>

On May 23, 2018, the cultural resources records search was conducted by Ms. Megan Black, B.A. (Attachment B in **Appendix I1**). The purpose of the records search was to identify previously recorded cultural resources (prehistoric and historic archaeological sites, historic buildings, structures, objects, or districts) within the project area and a half-mile radius. The records search included a review of previously recorded prehistoric and historic archaeological sites within the project area and a 0.5-mile buffer, and a review of listed cultural resource surveys and/or excavation reports within that same geographical area. The research was conducted at the South Central Coastal

Information Center (SCCIC) at the California State University, Fullerton, which is the local California Historic Resources Information System (CHRIS) Information Center.

The CHRIS record search indicated there were no archaeological sites or isolates or tribal cultural resources identified within the Project Site or within the half-mile buffer Zone. The only resource was a single historic property, a bridge, was identified within the half-mile buffer zone, but it is not within the APE.

Previously Conducted Cultural Resources Studies

Three previous cultural resources surveys identified in the CHRIS records search included a portion within the half-mile buffer zone, but none of them touched upon the Project Site itself. None of these surveys identified archaeological sites or isolates or tribal cultural resources.

Pedestrian Survey

On May 23, 2018, an intensive pedestrian cultural resources survey was undertaken by Stephen O'Neil, M.A., RPA, who qualifies as a Principal Prehistoric Archaeologist and Historic Archaeologist per United States Secretary of the Interior Standards. Survey transects were conducted in an opportunistic manner in conformity with the available exposed ground surface and layout of the landscaping. The pedestrian survey observed no prehistoric or historic artifacts or features.

Native American Outreach

In relation to the Phase I Cultural Resources Evaluation Report, on April 26, 2018, letters and emails were sent by UltraSystems to the nine Native American contacts (representing seven tribes and bands) provided by the NAHC. The letter sent to each of the Native American contacts described the project and requested information about any traditional cultural properties, sites, or resources about which they may be concerned. The following entities were contacted: the Gabrieleño Band of Mission Indians – Kizh Nation; the Fernandeño Tataviam Band of Mission Indians (FTBMI); the Gabrielino-Tongva Tribe; the Gabrielino/Tongva Nation; the San Fernando Band of Mission Indians; the Gabrielino-Tongva San Gabriel Band of Mission Indians; and the Gabrielino Tongva Indians of California Tribal Council.

On May 1, 2018, Mr. Andrew Salas, Chairman of the Gabrieleño Band of Mission Indians – Kizh Nation, replied by email to the cultural report investigation's outreach, stating that the project area has the potential for discoveries of cultural resources, and requested that Native American monitors be present during ground-disturbing activities.

On May 29, 2018, during a call to Mr. Anthony Morales, Chairperson of the Gabrielino/Tongva San Gabriel Band of Mission Indians from Ms. Megan Black (Archaeological Technician), he stated that the project area is culturally sensitive to the Band and requested that both a Native American and an archaeological monitor be present during ground-disturbing activities (refer to **Appendix I1**, Attachment C).

4.13.3.3 Tribal Consultation under AB 52

In compliance with AB 52, notice regarding this project was mailed by HACLA on September 11, 2018 to the tribes on the City of Los Angeles Planning Department AB 52 contact list (**Appendix I2**). These were the FTBMI, the Gabrielino/Tongva San Gabriel Band of Mission Indians, the Gabrieleño Band of

Mission Indians – Kizh Nation, the Gabrielino - Tongva Tribe, the Gabrielino/Tongva Nation, and the San Fernando Band of Mission Indians. Mr. Jairo Avila, the Tribal Historic and Cultural Preservation officer for the FTBMI, responded to HACLA by email on September 13, 2018. Mr. Avila stated that the "project is out of the FTBMI's ancestral Tribal boundaries" and would defer consultation to members of the Gabrielino tribe.

On September 14, 2018, Mr. Andrew Salas, Chairperson of the Gabrieleño Band of Mission Indians – Kizh Nation, sent a letter to HACLA via email requesting consultation on the project. (See **Appendix I3**.)

The remaining four tribes did not respond to the lead agency within the thirty-day period to request consultation, nor have they responded to date.

Consultation with Gabrieleño Band of Mission Indians – Kizh Nation

On October 23, 2018 consultation was held via telephone between Chairman Salas, Tribal Biologist Matthew Teutimez and HACLA staff. Mr. Salas informed HACLA that the Gabrielino-Kizh Nation believes that the Rose Hill Courts site is located in a place that is sensitive for TCRs and that project activities may cause a substantial adverse impact on those resources. He stated that the Rose Hills area was the location of the traditional village of *Otsunga* (which means "place of the roses" in the Kizh language), is near an ancient trade route, and is located in an area rich in natural resources, which would have resulted in considerable human activity to gather and prepare those resources. Mr. Salas stated that archaeologists do not always make use of tribal traditional knowledge, and that sometimes such knowledge is in oral tradition and not always available to archaeologists for use in evaluating the potential for TCRs. Furthermore, in cultural reports analysis, archaeologists only consider undisturbed cultural resources while the tribal community cares just as much about resources in disturbed contexts because these are still artifacts made and used by their ancestors. Mr. Salas and Mr. Teutimez agreed to provide HACLA staff written documentation of the prehistoric use of the project area concerning the location of historic villages, trade routes, cemeteries and sacred/religious sites. The minutes for the October 23, 2018 consultation are in **Appendix I3**.

On November 21, 2018, HACLA received electronic correspondence from Chairman Salas with a link to the El Sereno Historical Society website and a screenshot of written material on the Rancho Rosa de Castilla detailing local history, as well as scanned pages from the interviews that anthropologist John. P. Harrington conducted with Gabrielino community members in the past that described the presence of *Otsunga* village. The tribe also provided standard mitigation measures that it requests for projects believed to be located within its ancestral territory, including tribal cultural resources monitors to supplement archaeological monitors during any ground disturbing activity. A copy of this correspondence from the tribe is included in **Appendix I3**.

On December 19, 2018, after acting in good faith and reasonable effort, HACLA sent a letter to the tribe explaining its determination that there is no substantial evidence of a potential impact to tribal cultural resources but nevertheless, in an effort to cooperate with the tribe, HACLA agreed to impose a condition of approval on the project to address inadvertent discoveries similar to conditions imposed by the City of Los Angeles on past projects. The condition would require that prior to any ground disturbing activities, a Workers Environmental Awareness Program would be conducted by a qualified archaeologist and include a process for notifying interested tribes in the unlikely event of the discovery of a potential resource. An archaeologist would opine on the reasonableness of any measures required by the tribe. The letter informed the tribe that after a good faith effort to consult, HACLA had determined the consultation process to be concluded under AB 52. A copy of HACLA's

December 19, 2018 letter to the tribe is included in **Appendix I3.** Included in this letter, HACLA also provided a copy of the project's Cultural Resources report to Mr. Salas in response to his request.

Despite having concluded consultation on December 19, HACLA continued to consider information from the tribe and to participate in further discussions with the tribe, pursuant to the tribe's request. On December 21, 2018 HACLA staff and Chairman Salas discussed HACLA's December 19 letter. Mr. Salas stated that he disagrees with the conclusions of the initial Cultural Resources report because it relies on record searches and pedestrian surveys, which do not, in his view, eliminate the potential for tribal resources. When asked for further evidence of the presence of TCRs, Mr. Salas referred to the oral traditions of his tribe. Mr. Salas stated he would provide information to support the tribe's knowledge of TCRs at the project site.

On January 8, 2019 further consultation with the Gabrielino - Kizh Nation occurred via telephone between Chairman Salas, Tribal Biologist Matthew Teutimez, and representatives for HACLA and Related. Mr. Salas and Mr. Teutimez again informed HACLA that the Gabrielino-Kizh Nation believes that the Rose Hill Courts site is located in a place that is sensitive for TCRs due to the presence of water, a known trade route and extensive natural resources, all of which would make the immediate area heavily used in the traditional past. The presence of the trade route in the canyon that leads from downtown Los Angeles to San Gabriel where Huntington Drive now runs, is a "geographic indicator" for a higher potential of possible burials due to people being buried where they died. They also now stated that the site of *Otsunga* village is located at the Rose Hill Courts project site and adjacent Our Lady of Guadalupe Roman Catholic Church across the street. Upon request for any written documentation of this assertion, Mr. Salas again forwarded material from the El Sereno Historical Society website, as well as a map of Gabrielino village sites and extracts from the J.P. Harrington interview notes. Mr. Teutimez stated that oral tradition is acceptable evidence, along with written documentation, of traditional cultural resources; he stated that oral traditional evidence given during a meeting can be transcribed and then used within reports. Specific potential mitigation measures and conditions of approval were not discussed. The minutes for the January 8, 2019 consultation are in **Appendix I3**.

On January 8 and February 2, 2019, Mr. Salas sent to HACLA a 2017 letter from Caltrans to the tribe regarding the SR 710 North Project, which referenced a report prepared by an archaeologist at LSA that also found the more likely location of Otsunga was in the area around CSU Los Angeles; an article written on Rose Hill by Eric Brightwell that mentions the village being located near Rose Hill without any source; and an article on the evolution of the Tongva name. This correspondence is included in **Appendix I3**. The tribe did not provide any written analysis or explanation as to why these materials support its position that the village was located at or near the Rose Hills court site.

On June 21, 2019, HACLA notified the tribe in writing that while it finds no substantial evidence to support a conclusion the Project would have significant impacts to Tribal Cultural Resources under CEQA, it would agree to an amended condition of approval providing for a Native American monitor during both the WEAP training for construction workers and ground disturbing activities, as well as a Registered Professional Archaeologist. That same day, the tribe responded in writing that it had received and accepted the final condition of approval (**Appendix I3**).

4.13.4 Analysis of Project Impacts under Thresholds of Significance (a) (i) and (ii)

Threshold (a): ***Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined***

in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

(i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code § 5020.1(k); or

(ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resource Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.

Direct Impacts

Previous cultural resources surveys within the half-mile buffer zone resulted in no archaeological sites or isolates or tribal cultural resources being recorded and no prehistoric or historic archaeological resources or tribal cultural resources were observed during the pedestrian field survey (**Appendix I1**). The fully-built environment of the project site and elevation relative to adjacent roads suggests that ground here has been significantly cut and filled, with no original surface soil remaining. There were no cultural resources identified, as defined by PRC § 21074. Additionally, the site has not been recommended for historic designation for prehistoric and TCRs. Outreach to local tribal organizations for the Cultural Resources Inventory report resulted in requests from both the Gabrielino Band of Mission Indians – Kizh Nation and the Gabrieleno/Tongva San Gabriel Band of Mission Indians to have a tribal monitor supplement the archeological monitor during ground disturbing construction activity. The Gabrieleno-Kizh Nation and the San Gabriel Band believe the project lies in a sensitive area regarded as the ancestral and traditional territories of both tribes (refer to **Section 4.4,** of this document, as well as **Section 4.13.3.1** above for further background on the potential location of *Otsunga* village). No traditional cultural sites were documented in the NAHC's SLF search (**Attachment C** in **Appendix I1**).

Based on the Phase I Cultural Resources Phase I Survey report (**Appendix I1**) which includes a records search at the CHRIS Southern Central Coastal Information Center of survey reports and site records, the pedestrian site survey, results of the SLF search by the NAHC, information provided by Gabrieleño-Kizh Nation, as well as the fact there was extensive construction on the project site during the 1940s, the probability for significant impacts to TCRs is low at the Project site. Given the presence of Native Americans in the Americas for more than 12,000 years, and in particular Southern California, HACLA recognizes it is likely that there would have been prehistoric people in the general vicinity of the project area for many generations. While the precise location of the village of *Otsungna* is unknown, it was likely located somewhere in a wide space along the canyon connecting Mission San Gabriel with old downtown Los Angeles, which now contains Mission Road, at the eastern edge of El Sereno and northwest of the CSU Los Angeles campus. This location is approximately 1.5 to 2.25 miles southwest of the Rose Hill Courts Project site. **Therefore, impacts to TCRs would be less than significant.**

Nonetheless, in an effort to cooperate with Gabrieleno-Kizh Nation, the project will be subject to the following condition of approval as an additional means of protection for the inadvertent discovery of TCRs:

Condition of Approval – Tribal Cultural Resource Inadvertent Discovery (**TCR-COA-1**)

The process for addressing inadvertent discoveries of objects or artifacts that may be tribal cultural resources during construction of the Rose Hill Courts Redevelopment Project is as follows:

- Prior to commencement of any ground disturbing activities, the Project contractor (including construction workers and foreman) will receive Workers Environmental Awareness Program ("WEAP") training that: a) describes and illustrates potential regional cultural resources; b) emphasizes cultural sensitivity regarding the continued presence of local Native Americans and their concerns; and c) describes legal and regulatory requirements for the preservation of tribal cultural resources and the responsibility of the contractor to comply with these requirements. "Ground disturbing" activities will include the following: foundation demolition and removal, excavation, grading, utilities installation, foundation work, pile driving (foundation, shoring, etc.). The training will instruct the workers on how to recognize potential tribal cultural resources if inadvertently discovered and promptly report them to their immediate supervisors. The foreman will receive training on when and how to contact the Housing Authority of the City of Los Angeles ("HACLA") concerning any potential tribal cultural resource finds.
- The WEAP training will be conducted by a Registered Professional Archaeologist retained by HACLA and paid for by the developer. At least three calendar days prior to the WEAP training, HACLA will notify the Gabrieleño Band of Mission Indians – Kizh Nation of the WEAP training via electronic correspondence to the address provided by the tribe and invite the tribe to have a qualified Native American Monitor present during the WEAP training. The Native American Monitor, if present, will be retained by HACLA and paid for by the developer at a reasonable hourly rate agreed upon by the parties.
- At least three calendar days prior to ground disturbing activities, HACLA shall notify the Gabrieleño Band of Mission Indians – Kizh Nation of the planned activities via electronic correspondence to the address provided by the tribe. A Native American Monitor designated by the Gabrieleño Band of Mission Indians – Kizh Nation shall be allowed to be present on-site with the Archaeological Monitor (both of whom are to be retained by HACLA and paid for by the developer) during ground disturbing activities. The Native American Monitor shall confirm whether he/she intends to be present at least twenty-four hours prior to the commencement of the planned activities noticed by HACLA and will be compensated at a reasonable hourly rate only for time spent monitoring the planned activities noticed by HACLA. The absence of the Native American Monitor shall not preclude any planned activities from proceeding.
- The Archaeological Monitor and the Native American Monitor under the supervision of the Project Archaeologist (a Registered Professional Archaeologist) shall be present according to a schedule agreed upon by the Project Archaeologist, until the Project Archaeologist determines that ground disturbing activities are no longer occurring.
- Upon a discovery of a potential tribal cultural resource, the developer will immediately stop all ground disturbing activities in the area of the find, defined as a radius of no more than 10 feet, and contact the following: (1) all California Native American tribes that have informed the City of Los Angeles Department of City Planning they are traditionally and culturally affiliated with the geographic area of the proposed project and (2) HACLA at (213) 252-6120.
- If HACLA, in consultation with the Project Archaeologist and the Native American Monitor, determines pursuant to Public Resources Code section 21074(a)(2) that the object or artifact

appears to be a tribal cultural resource, HACLA will provide any affected tribe a reasonable period of time, up to 15 calendar days after notification, to conduct a site visit and make recommendations to the developer and HACLA regarding the monitoring of future ground disturbing activities, as well as treatment and disposition of any discovered tribal cultural resources.

- The developer will implement the affected tribe's recommendations if the Project Archaeologist, in their professional opinion, concludes that the affected tribe's recommendations are reasonable and feasible.
- The developer will submit a cultural resources monitoring plan (CRMP) prepared by the Project Archaeologist to HACLA that includes all recommendations from HACLA and any affected tribes that have been reviewed and determined by the Project Archaeologist to be reasonable and feasible. The developer will not be allowed to recommence ground disturbing activities in the find area until this plan is approved by HACLA.
- If the developer does not accept a particular recommendation determined to be reasonable and feasible by the Project Archaeologist, the developer may request mediation by a mediator agreed to by the developer and HACLA who has the requisite professional qualifications and experience to mediate such a dispute. The developer will pay any costs associated with the mediation.
- While the find assessment and CRMP are being prepared, the developer may recommence ground disturbing activities outside of a specific radius of the tribal cultural resource discovery site, so long as this radius has been reviewed by the Project Archaeologist and determined to be reasonable and appropriate.
- Copies of any subsequent cultural resource report (a study as provided for in the CRMP containing analysis and report on any finds), tribal cultural resources study or report detailing the nature of any tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources will be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton within 60 calendar days following the conclusion of the monitoring by the Project Archaeologist (or within the time period established in the CRMP based on the nature of any discoveries of potential tribal cultural resources).
- Notwithstanding the above, any information determined to be confidential in nature, by HACLA, will be excluded from submission to the SCCIC or the general public under the applicable provisions of the California Public Records Act and/or the California Public Resources Code.

4.13.5 Cumulative Impacts

No TCRs have been identified within the Project Site or within the vicinity of the Project Site. The Environmental Setting of this DEIR indicates a total of seven related projects in the vicinity of the Project Site. The Project and related projects are located within an urbanized area of the City of Los Angeles that have been disturbed and developed over the decades. Should tribal cultural resources be uncovered during construction of these projects, each related project would be required to comply with the applicable laws and regulations regarding tribal cultural resources, as detailed in the Regulatory Framework Setting in **Section 4.4.2**, and as developed for the Rose Hill Courts project described above. Additionally, related projects would be required to comply with the consultation requirements of AB 52 to determine and mitigate any potential impacts to TCRs. **Thus, cumulative**

impacts to tribal cultural resources would be less than significant and would not be cumulatively considerable. No cumulative tribal cultural resource impacts would occur with the implementation of the project

4.13.6 Mitigation Measures

The project would result in less than significant impacts with respect to tribal cultural resources. Therefore, no mitigation measures are required.

4.13.7 Level of Significance after Mitigation

Project impacts were determined to be less than significant for tribal cultural resources and no mitigation measures would be required.

4.14 Wildfire

4.14.1 Introduction

This section of the Draft EIR provides an analysis of the project's potential impacts with regards to wildfire risks. In 2018, wildfire was added to the State CEQA guidelines Appendix G checklist to address factors that could expose people or structures to fire or post-fire flooding or landslides, impair emergency response, or require installation of infrastructure that could exacerbate fire risk. The analysis in this section is based on the California Department of Forestry and Fire Protection (CalFire) fire hazard information and the Biological Resources Evaluation (BRE) (UltraSystems, 2019) conducted for the project and included in **Appendix H** of this Draft EIR. This section also analyzes consistency of the project with applicable county and city emergency response plans, evacuation plans, and designated disaster routes.

4.14.2 Environmental Setting

4.14.2.1 Regulatory Framework

Federal

<u>National Cohesive Wildland Fire Management Strategy</u>

The National Cohesive Wildland Fire Management Strategy (Cohesive Strategy) was created in response to requirements of the Federal Land Assistance, Management, and Enhancement (FLAME) Act of 2009. The Cohesive Strategy is a collaborative process with all levels of government and nongovernmental organizations, as well as the public, to seek solutions to wildland fire management issues (California Office of Planning and Research [OPR], 2015). Three primary factors are identified in addressing the wildland fire problems:

1. Restoring and maintaining resilient landscapes. The strategy must recognize the current ecosystem health and variability of resilient landscapes from geographic area to geographic area, including climate change. Because landscape conditions and needs vary depending on local climate and fuel conditions, among other elements, the strategy will address landscapes on a regional and sub-regional scale.

2. Creating fire-adapted communities. The strategy will offer options and opportunities to engage communities and work with them to become more resistant to wildfire threats, and respond in the event of a wildfire emergency.

3. Responding to wildfires. This element considers the full spectrum of fire management activities and recognizes the differences in missions among local, state, tribal and federal agencies. The strategy offers collaboratively developed methodologies to move forward (OPR, 2015).

State

<u>California Environmental Quality Act (CEQA)</u>

The California Environmental Quality Act (CEQA) of 1970 (CEQA; Public Resources Code, §§ 21000-21178), applies to discretionary projects proposed to be carried out by public agencies. In

2018, the State CEQA guidelines Appendix G checklist was updated with new questions related to wildfire, pursuant to Senate Bill 743 (Steinberg, 2013), and Senate Bill 1241 (Kehoe, 2012). It was determined that hazards associated with wildfire require special consideration and that lead agencies must "discuss any inconsistencies between the proposed project and applicable general plans" related to a project's potential environmental impacts in a project's environmental review (State CEQA Guidelines § 15125[d].) The questions in the new wildfire CEQA Guidelines Appendix G focus on the effects of new projects in creating or exacerbating wildfire risks (California Natural Resources Agency, 2018).

Senate Bill 1241 (Kehoe, 2012)

In 2012, Senate Bill 1241 (SB 1241) passed, requiring that all future general plans address fire risk in state responsibility areas and very high fire hazard severity zones in their safety element. In addition, the bill requires cities and counties to make certain findings regarding available fire protection and suppression services before approving a tentative map or parcel map (California Legislative Information, 2012). Senate Bill 1241 also required the Office of Planning and Research, the Natural Resources Agency, and CalFire to develop "amendments to the initial study checklist of the [CEQA Guidelines] for the inclusion of questions related to fire hazard impacts for projects located on lands classified as state responsibility areas, as defined in section 4102, and on lands classified as very high fire hazard severity zones, as defined in subdivision (i) of section 51177 of the Government Code." (Pub. Resources Code, § 21083.01) (California Natural Resources Agency, 2018).

Senate Bill 901

Senate Bill 901 (SB 901) is a comprehensive wildfire management, prevention, and monitoring act. It includes provisions for CEQA exemptions for projects that reduce risk of wildfires in designated high-severity areas and creates a Wildfire Resilience Program led by CalFire. Additionally, the bill sets aside funding for wildfire research and establishes the Commission on Catastrophic Wildfire Cost and Recovery. The commission is tasked with examining issues related to catastrophic wildfires that are associated with utility infrastructure. By reviewing numerous criteria including nature and severity of the corporation's conduct in wildfire prevention and monitoring practices, the commission will determine whether electric corporations may recover wildfire costs by charging consumers (California Legislative Information, 2018).

Assembly Bill 2551

Assembly Bill 2251 (AB 2251) authorizes CAL FIRE to collaborate with private landowners on prescribed burns in order to prevent high-intensity wildland fires and achieve additional land management goals. The bill also provides the director with the authority to make loans to cover the landowner's cost for the work. Finally, the bill authorizes the Natural Resources Agency (NRA) and California Environmental Protection Agency (CalEPA) to jointly develop a specific plan for forest and watershed restoration activities (California Legislative Information, 2018b).

2017 State of California General Plan Guidelines

The 2017 edition of the General Plan Guidelines (GPG) (OPR, 2017) is a resource to help planners accomplish their respective community's priorities and vision while meeting larger state goals, increasing community collaboration, and improving competitiveness for funding opportunities. The GPG policy recommendations focus on four key themes; climate change, economics, healthy communities, and equitable opportunities. The GPG includes development goals and public policy

relative to the distribution of future land uses, both public and private, and it provides tools for communities to utilize in updating their general plans. The GPG requires the safety element of county and city plans to include identification of policies and mitigation for the protection of the community from any unreasonable risks associated with wildland and urban fires (OPR, 2017).

California State Hazard Mitigation Plan

The California State Hazard Mitigation Plan (SHMP) represents the state's primary hazard mitigation guidance document - providing an updated analysis of the state's historical and current hazards, hazard mitigation goals and objectives, and hazard mitigation strategies and actions. Chapter 8 of the 2018 SHMP (California Governor's Office of Emergency Services [CalOES], 2018) addresses wildfire hazards. According to the SHMP, wildfire, and particularly wildland-urban interface (WUI) fire, has represented the third greatest source of hazard to California, both in terms of recent state history as well as the probability of future destruction of greater magnitudes than previously recorded (CalOES, 2018).

2018 Strategic Fire Plan for California

The 2018 Strategic Fire Plan for California (California Fire Plan) (CalFire, 2018) is the state's road map for reducing the risk of wildfire. The Fire Plan is a cooperative effort between the State Board of Forestry and Fire Protection and the California Department of Forestry and Fire Protection. The purpose of the Strategic Fire Plan is to provide CalFire with appropriate guidance for adequate statewide fire protection of state responsibility areas. The 2018 Plan focuses on (1) fire prevention and suppression activities to protect lives, property, and ecosystem services, and (2) natural resource management to maintain the state's forests as a resilient carbon sink to meet California's climate change goals and to serve as important habitat for adaptation and mitigation. The goals of the 2018 Strategic Fire Plan's vision revolve around fire prevention, natural resource management, and fire suppression efforts (CalFire, 2018). Major components of the plan are:

- Improve the availability and use of consistent, shared information on hazard and risk assessment;
- Promote the role of local planning processes, including general plans, new development, and existing developments, and recognize individual landowner/homeowner responsibilities;
- Foster a shared vision among communities and the multiple fire protection jurisdictions, including county-based plans and community-based plans such as Community Wildfire Protection Plans (CWPP);
- Increase awareness and actions to improve fire resistance of man-made assets at risk and fire resilience of wildland environments through natural resource management;
- Integrate implementation of fire and vegetative fuels management practices consistent with the priorities of landowners or managers;
- Determine and seek the needed level of resources for fire prevention, natural resource management, fire suppression, and related services; and
- Implement needed assessments and actions for post-fire protection and recovery.

Public Resources Code 4201-4204 (Fire Hazard Severity Zones)

Public Resources Code 4201-4204 provides for the classification of lands within state responsibility areas in accordance with the severity of fire hazard present for the purpose of identifying measures to be taken to reduce the rate of spreading and to decrease the potential intensity of uncontrolled fires that threaten to destroy resources, life, or property. This code directs the Director of the California Department of Forestry and Fire Protection (CalFire) to designate fire hazard severity zones within state responsibility, and assign to each zone a rating reflecting the degree of severity of fire hazard that is expected to prevail in the zone. Local agencies are directed to designate, by ordinance, very high fire hazard severity zones in its jurisdiction (California Legislative Information, 2019f).

Government Code 51175-51189 (Very High Fire Hazard Severity Zones)

Government Code 51175-51189 classifies lands in the state in accordance with whether a very high fire hazard is present so that public officials are able to identify measures that will retard the rate of spread, and reduce the potential intensity of, uncontrolled fires that threaten to destroy resources, life, or property, and to require that those measures be taken. It gives direction to local agencies regarding designation of very high fire hazard severity zones in its jurisdiction. It allows local agencies to include areas as very high fire hazard severity zones within their jurisdiction that were not identified as very high fire hazard severity zones by CalFire. It establishes various mitigation strategies to reduce risk associated with wildland fire, such as building standards that provide for comprehensive space and structure defensibility to protect structures from fires spreading from adjacent structures or vegetation and vegetation from fires spreading from adjacent structures (California Legislative Information, 2019g).

California Code of Regulations, Title 24, Part 9, California Fire Code

Requirements in the California Fire Code (CFC) are for building and equipment design, such as fire-rated construction, alarm systems, sprinkler systems, and means of egress; requirements for specific land uses, including airports, dry cleaners, gas stations, and automotive service businesses; hazardous materials; fire flow requirements; and fire hydrant spacing. The CFC is updated on a three-year cycle, and the 2016 CFC took effect on January 1, 2017.

California Code of Regulations, Title 24, Part 2, California Building Code

Current law states that every local agency enforcing building regulations, such as cities and counties, must adopt the provisions of the California Building Code (CBC) within 180 days of its publication date, which is established by the California Building Standards Commission. The most recent building standard adopted by the legislature and used throughout the state is the 2016 version of the CBC, often with local, more restrictive amendments that are based on local geographic, topographic, or climatic conditions. The CBC is updated on a three-year cycle, and the 2016 CBC took effect on January 1, 2017.

Requirements for structures in Fire Hazard Severity Zones are in Chapter 7A of the California Building Code, "Materials and Construction Methods for Exterior Wildfire Exposure," and Chapter 49 of the California Fire Code, "Requirements for Wildland-Urban Interface Fire Areas." Requirements in these two chapters cover roofing; attic ventilation; exterior walls; exterior windows and glazing; exterior doors; decking; protection of underfloor, appendages, and floor projections; and ancillary structures.

Local

County of Los Angeles Operational Area Emergency Response Plan

The Los Angeles County Office of Emergency Management (OEM) is the day-to-day Los Angeles County Operational Area coordinator for the entire geographic area of the county. This broad responsibility includes maintaining an approved Operational Area Emergency Response Plan (ERP) (Los Angeles County Office of Emergency Management, 2018). The ERP addresses the Los Angeles County Operational Area's planned response to extraordinary emergency situations associated with natural and man-made disasters and technological incidents. The operational concepts in this plan focus on potential large-scale disasters which can generate unique situations requiring an unusual or extraordinary emergency response.

Los Angeles County Fire Department 2018 Strategic Fire Plan

The Los Angeles County Fire Department 2018 Strategic Fire Plan (Los Angeles County Fire Department, 2018) identifies and prioritizes pre-fire and post-fire management strategies and tactics meant to reduce the loss of values at risk within the county. The plan states that addressing wildfire potential continues to be a top priority and a thorough understanding of the wildfire environment is essential in understanding fire severity potential in Los Angeles County. A major element of the California Strategic Fire Plan is an intensive assessment process graphically depicting fuels, weather, and assets at risk in a Geographic Information System (GIS) program. The GIS layers are continually field-validated and used to identify areas within or adjacent to the WUI most at risk. The WUI areas are the geographical intersection of two disparate systems, wildland and structures. At this interface, structures and vegetation are close enough that a wildland fire could spread to structures or fire could spread from structures to ignite vegetation.

City of Los Angeles General Plan Safety Element

The Safety Element the General Plan addresses the issue of protection of its people from unreasonable risks associated with natural disasters, e.g., fires, floods, earthquakes (City of Los Angeles Department of City Planning, 2018a). The Safety Element contains goals and objectives related to the prevention of fires and maintenance of public safety. As discussed in the City's Safety Element, "Urban development in proximity to brush and hillside terrain makes containment of wild fires difficult. The density and variety of urban development from low rise to high rise structures, traditional commercial and industrial to harbor and airport facilities poses unique fire response and suppression challenges for the City's emergency forces." (City of Los Angeles Department of City Planning, 2018a). Exhibit D (Selected Wildfire Fire Hazard Areas) of the Safety Element depicts the broad scope of potential hazards. The City's fire safety program addresses the broad scope of fire prevention and suppression and emergency response operations.

City of Los Angeles 2018 Local Hazard Mitigation Plan

The City of Los Angeles 2018 Local Hazard Mitigation Plan (LHMP) (Tetra Tech Inc., 2018) was developed to establish and promote a comprehensive mitigation policy and program to reduce risks from disasters to the people, property, economy and environment within the City. The City's LHMP includes a hazard risk assessment and mitigation strategies and goals. WUI fire is listed as having a high hazard ranking in Table ES-1, Natural Hazard Risk Ranking. Chapter 13 addresses "Urban/Wildland Interface Fire" (Tetra Tech Inc., 2018).

Los Angeles Municipal Code

Los Angeles Municipal Code § 57.101. Los Angeles Fire Code, establishes the minimum requirements for providing a reasonable level of safety and property protection from fire hazards in new and existing buildings. The section details necessary permits, emergency plans, and fire protection supplies required to maintain the required level of fire safety. The Fire Code also includes specifications for sprinkler, fire-extinguishing, fire alarm, and smoke control systems (City of Los Angeles Municipal Code, 2018b).

City of Los Angeles Building Code and Fire Code

The City of Los Angeles Building Code and safety regulations pertaining to development in a very high fire hazard severity zone are as follows: Per the 2017 Los Angeles City Fire Code, Section 301, the provisions of this chapter shall govern the occupancy and maintenance of all structures and premises for precautions against fire and the spread of fire and general requirements of fire safety (ICC Public Access, 2018).

Northeast Los Angeles Community Plan

Policy 9-1.1. Promote land use policies that enhance accessibility for firefighting equipment and are compatible with effective levels of service.

4.14.2.2 Existing Conditions

The project site is characterized as urban developed with ornamental trees and shrubs throughout. Land uses surrounding the site include residential development to the south and east and natural open space, regional recreational park lands, and equestrian trails to the north and west. The area is characterized by its numerous steep hills and vistas, as well as the Ernest E. Debs Regional Park to the north, which is the fourth largest park in the City of Los Angeles. The regional park contains a mosaic of native vegetation communities such as buckwheat scrub, walnut woodland, and oak woodland. The park also contains many other non-native ornamental trees, shrubs, manicured lawns, and a small community garden. However, according to the U.S. Forest Service (USFS) mapped WUI areas, the project site is not located within a WUI area and there are no WUI areas mapped adjacent to or in the vicinity of the project site (USFS, 2019).

The project site currently consists of an administration building and 14 two-story, wood-frame buildings with townhouse and flat style apartments comprising 100 units. The existing buildings currently have significant capital needs due to their age (75 years), and the property's extensive termite infestation has damaged the existing structures. The existing conditions onsite include aging wood-frame buildings, utilities, and infrastructure. The existing buildings were constructed in the 1940s and do not have the fire suppression sprinklers.

CalFire is legally mandated to periodically map Fire Hazard Severity Zones on State Responsibility Areas (SRAs), as well as recommend Very High Fire Hazard Severity Zones in Local Responsibility Areas (LRAs). CalFire established the Fire and Resource Assessment Program (FRAP) to develop a statewide, consistent logic and science-based model for Fire Hazard Zoning to meet the needs of the adoption of new building standards.

CalFire's mapped Fire Hazard Severity Zones for SRAs and Very High Fire Hazard Severity Zones in LRAs are shown on **Figures 4.14-1** and **4.14-2**. The project site is located in an SRA area with a non-

fire hazard designation (CalFire, 2007) and an LRA - Very High Fire Hazard Severity Zone (CalFire, 2012).

Very High fire hazard designation refers to either (CalFire, 2019):

a) wildland areas supporting high-to-extreme fire behavior resulting from climax fuels typified by well-developed surface fuel profiles (e.g., mature chaparral) or forested systems where crown fire is likely. Additional site elements include steep and mixed topography and climate/fire weather patterns that include seasonal extreme weather conditions of strong winds and dry fuel moistures. Burn frequency is typically high and should be evidenced by numerous historical large fires in the area. Firebrands from both short- (<200 yards) and long-range sources are often abundant.

OR

b) developed/urban areas typically with high vegetation density (>70 percent cover) and associated high fuel continuity, allowing for frontal flame spread over much of the area to progress impeded by only isolated non-burnable fractions. Often where tree cover is abundant, these areas look very similar to adjacent wildland areas. Developed areas may have less vegetation cover and still be in this class when in the immediate vicinity (0.25 mile) of wildland areas zoned as Very High.

4.14.3 Project Impacts

4.14.3.1 Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, if located in or near state responsibility areas or lands classified as very high fire hazard security zone the project would have a significant impact related to wildfire if it would:

Threshold (a) ***Substantially impair an adopted emergency response plan or emergency evacuation plan; or***

Threshold (b) ***Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire; or***

Threshold (c) ***Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts the environment.***

Figure 4.14-1
FIRE HAZARDS - STATE RESPONSIBILITY AREA

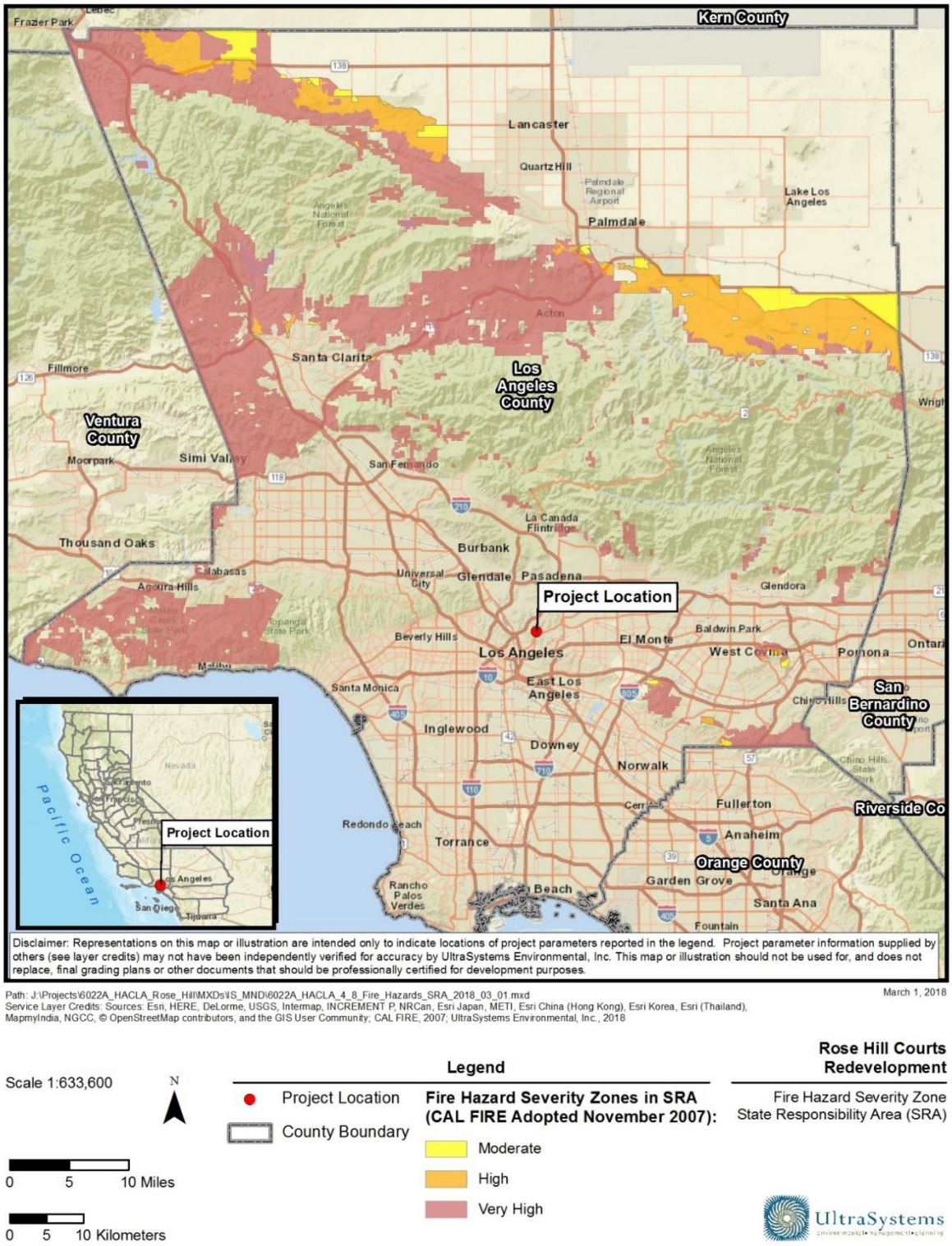
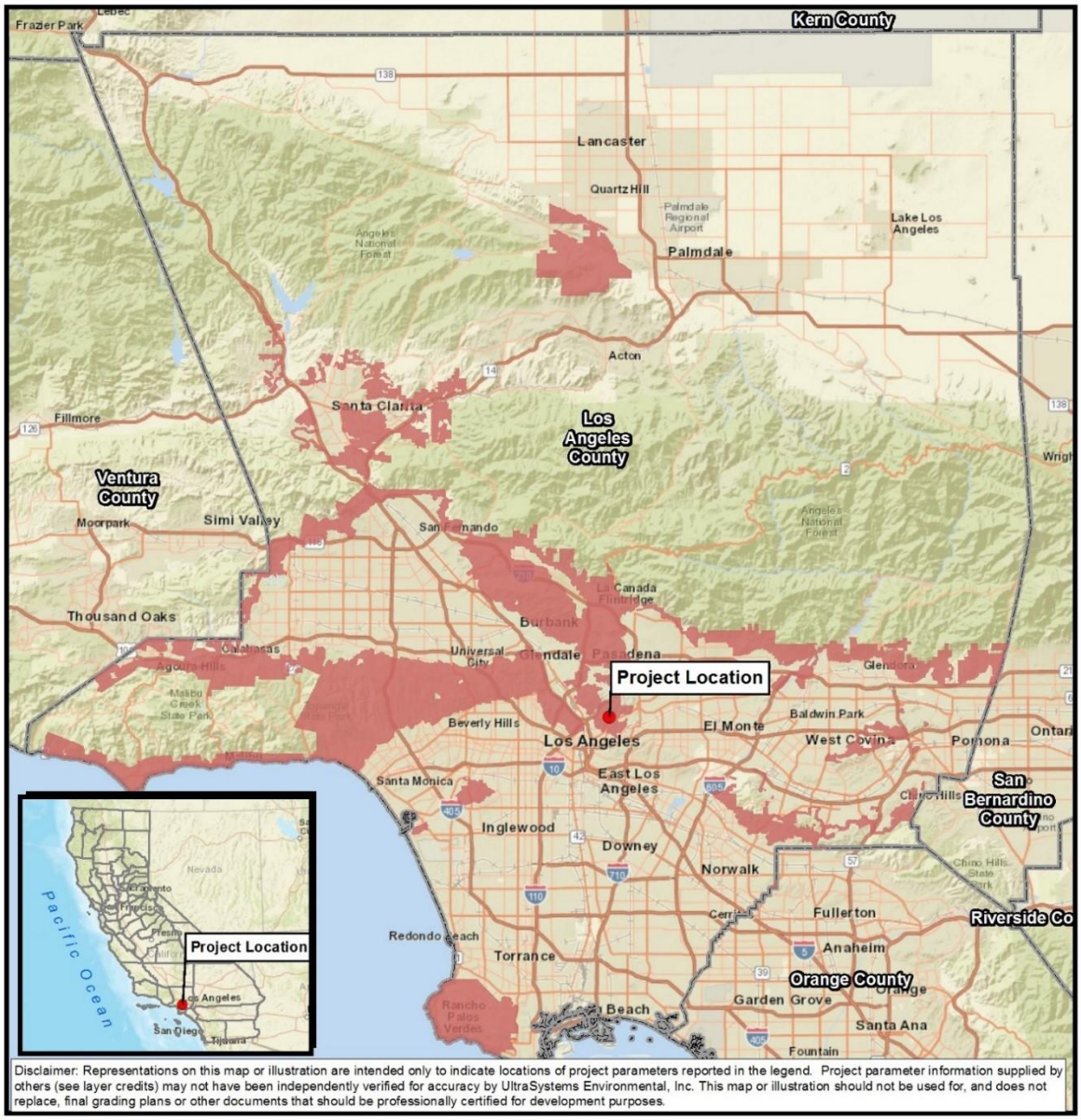


Figure 4.14-2
FIRE HAZARDS - LOCAL RESPONSIBILITY AREA



Disclaimer: Representations on this map or illustration are intended only to indicate locations of project parameters reported in the legend. Project parameter information supplied by others (see layer credits) may not have been independently verified for accuracy by UltraSystems Environmental, Inc. This map or illustration should not be used for, and does not replace, final grading plans or other documents that should be professionally certified for development purposes.

Path: J:\Projects\6022A_HACLA_Rose_Hill\MXDs\IS_MND\6022A_HACLA_4_8_Fire_Hazards_LRA_2018_03_01.mxd
Service Layer Credits: Sources: Esri, HERE, DeLorme, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), MapmyIndia, NGCC, © OpenStreetMap contributors, and the GIS User Community, Cal Fire, 2007/2012; UltraSystems Environmental, Inc., 2018

March 1, 2018

Scale 1:633,600

N

0 5 10 Miles

0 5 10 Kilometers

Legend

- Project Location
- County Boundary

Fire Hazard Severity Zones in LRA (CAL FIRE Recommended March 2012):

- Very High

Rose Hill Courts Redevelopment

Fire Hazard Severity Zone
Local Responsibility Area (LRA)

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Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post fire slope instability, or drainage changes.

4.14.3.2 Methodology

Tasks performed for this analysis included a review of adopted emergency response plans and emergency evacuation plans relevant to the project site. Other tasks included review of biological information pertaining to the project site; review and summary of prior environmental documents pertaining to the project site; an evaluation of standard environmental record sources contained within federal, state and local environmental databases within specific search distances; an evaluation of additional environmental record sources obtained from local regulatory departments/agencies; a qualitative evaluation of the physical characteristics of the project site through a review of published topographic maps and area observations to characterize existing conditions; an evaluation of past site and adjacent/nearby property uses through a review a physical inspection of the project site.

4.14.3.3 Analysis of Project Impacts

Threshold (a): Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?

Review of Los Angeles County Disaster Routes Map for the City of Los Angeles (Los Angeles County Department of Public Works, 2013) shows that the project site is not directly accessed by a road designated as a disaster route. However, a portion of Huntington Drive, located within 1,000 feet southeast of the project site, is a designated disaster route (See **Figure 4.14-3 below**).

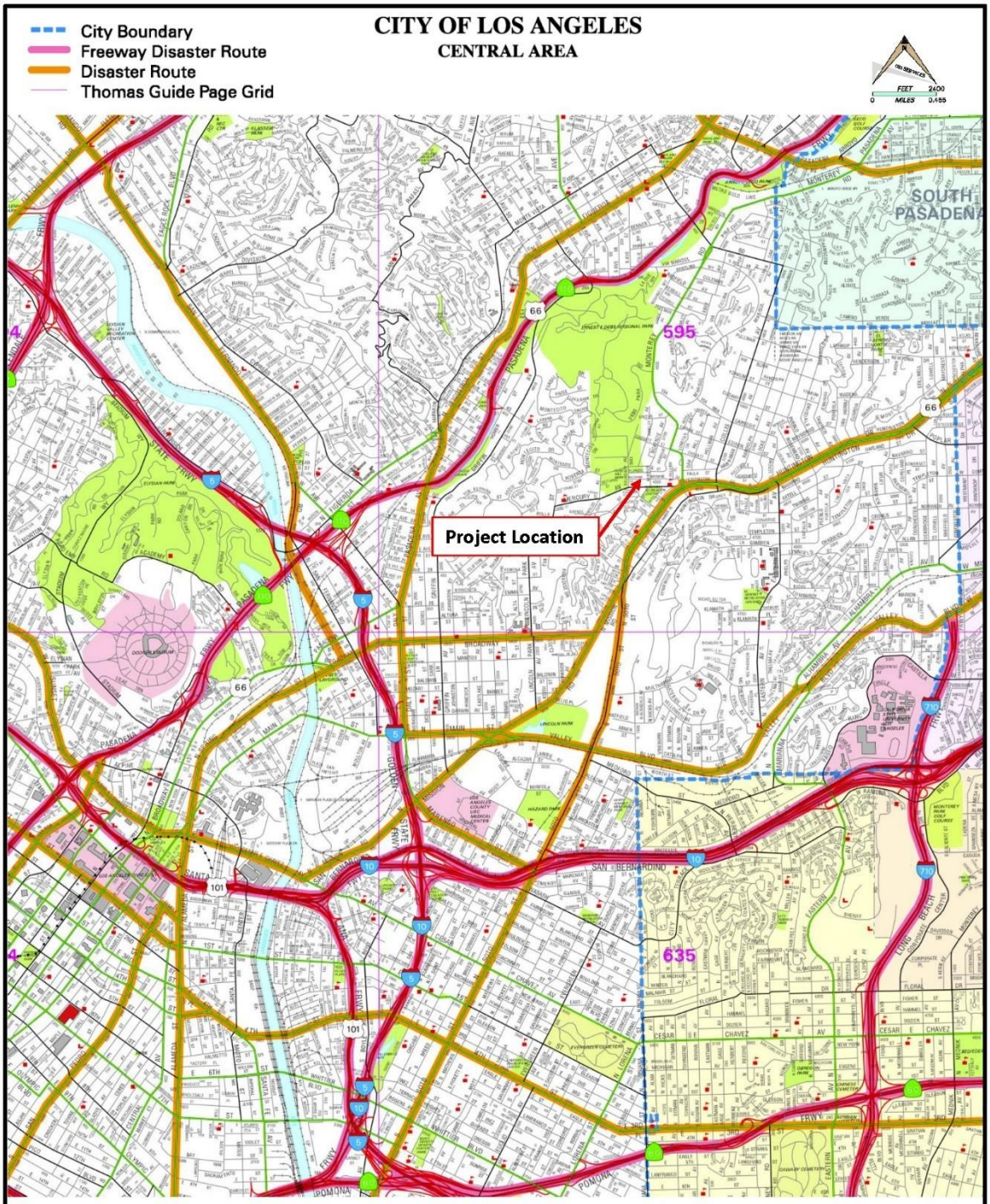
<u>Project Construction</u>

As discussed in **Section 2.0**, Project Description, construction activities for the project would be primarily confined to the project site and would only include minor offsite improvements in the public right-of-way for utilities such as water, sewer, and electricity. These offsite improvements would be limited to only the public right-of-way in the streets surrounding the project site; Florizel Street, Boundary Avenue, McKenzie Avenue, and Mercury Avenue.

In addition, a Construction Management Plan will be implemented during construction of the project to ensure that adequate and safe access remains available within and near the project site during construction activities. The Construction Management Plan will detail how parking will be managed during Phase I and Phase II of project construction. The parking management plan will specify where onsite and offsite parking will be available during both phases of project construction. The Construction Management Plan will include a street closure plan that details how vehicle traffic (including bus traffic, and potential temporary bus stop closure or relocation along Mercury Avenue), pedestrian traffic, and bicycle traffic will flow during temporary street closures during both Phase I and Phase II of project construction.

The project site is not adjacent to nor accessed by a road designated as a disaster route. The project would also comply with all applicable codes and ordinances for emergency access. Therefore, with adherence to regulatory requirements and implementation of a Construction Management Plan, construction of the project would not impair implementation of, or physically interfere with, any adopted or onsite emergency response or evacuation plans.

Figure 4.14-3
DISASTER ROUTES



Disclaimer: Illustration provided by City of Los Angeles, who has indicated that the information is true and correct. No other warranties are expressed or implied.

Source: City of Los Angeles, August 2013, http://dpw.lacounty.gov/dsg/disasterroutes/map/Los%20Angeles%20Central%20Area.pdf

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Rose Hill Courts Redevelopment

Disaster Routes

Therefore, there would be no impacts related to emergency response and evacuation during construction.

Project Operation

During operation, the project would not involve any activities that would impede public access or travel along the public right-of-way or interfere with an adopted emergency response or evacuation plan. As discussed in **Section 4.13**, Transportation, of this Draft EIR, the project site plan will be reviewed by the Los Angeles Fire Department and the project complies with all emergency access and sight-line requirements. Therefore, the project would not result in inadequate emergency access during operation and no impacts would occur. In addition, the increase in traffic generated by the project would not significantly impact emergency vehicle response to the project site and surrounding uses, including along City-designated disaster routes since the drivers of emergency vehicles are able to avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Refer to **Section 4.11**, Public Services, of this Draft EIR, for a detailed analysis regarding emergency response. **Therefore, there would be no impacts associated with emergency response and emergency evacuation plans.**

Furthermore, the project would not include a land use that would constitute a potential hazard to the community (such as an airport, oil refinery, or chemicals plant), nor would it close any existing streets or otherwise represent a significant impediment to emergency response and evacuation of the local area. **Therefore, the project's proposed land uses would not require a new, or interfere with an existing risk management, emergency response, or evacuation plan, and no impacts are anticipated.**

Threshold (b): Would the Project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

The project would not exacerbate wildfire risks because the project would include required fire suppression design features (i.e., fire-resistant building materials, where appropriate, smoke detection and fire alarm systems, automatic sprinkler systems (in compliance with all applicable City and Fire codes), portable fire extinguishers, and emergency signage in all buildings, and required brush clearance), identified in the latest edition of the California Building Code. The project would not require the installation or maintenance of infrastructure that may exacerbate fire risk because it is an infill development project in an already urban and developed portion of the City of Los Angeles.

The landscape design for Rose Hill Courts would include plant materials that are both drought tolerant and fire resistant. Plants adjacent to buildings would be spaced further apart, and trees would be smaller to medium sized. Consideration has been given to "firewise landscaping", which factors in; plant selection, plant placement, and maintenance. Plant spacing near the buildings would be increased to mitigate fire from spreading horizontally. Trees would be selected for their fire-resistant characteristics and would be planted away from buildings. A permanent automatic irrigation system would be installed onsite. The landscaping onsite would be maintained on a regular schedule. Landscaping would be trimmed, cleared, and all dead material would be removed. Additionally, all grass and weeds within 200 feet of structures would either be removed or cut back and native shrubs would be trimmed and be kept 18 feet from any structure or other native shrubs. All trellis structures would be made of steel so as not to be flammable.

The existing buildings onsite have aging termite-infested wood frames and no fire suppression sprinklers. The new buildings would be built to current codes and would include fire suppression sprinklers and safety features. The project would be required to comply with City of Los Angeles Building Code and safety regulations pertaining to development in a very high fire hazard severity zone. Per the 2017 Los Angeles City Fire Code, Section 301, the provisions of that chapter shall govern the occupancy and maintenance of all structures and premises for precautions against fire and the spread of fire and general requirements of fire safety (ICC Public Access, 2018). The project is required to comply with all applicable chapters of the City of Los Angeles Fire Code, including but not limited to Section 315, General Storage, regarding storage of combustible materials; Chapter 6, Building Services and Systems; Chapter 7, Fire and Smoke Protection Features; and Chapter 9, Fire Protection Systems (ICC Public Access, 2018). Therefore, the new buildings would include materials and fire safety features that would be more fire resistant and safer than the existing buildings. **Therefore, with compliance with all applicable regulations, the project would have less than significant impacts related to risk of loss, injury or death involving wildland fires.**

Threshold (c): ***Would the Project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?***

The proposed project includes offsite utility improvements in the public right-of-way for water, sewer, and electricity. No installation of fuel breaks or emergency water sources would be required. The new water, power, and sewer lines would be installed where the existing aging utilities are currently located. The proposed utility upgrades would improve the service and longevity of those utilities, which would be constructed in compliance with all applicable City and Fire codes identified in the latest edition of the California Building Code. The project is an infill development project in an already urban and developed portion of the City of Los Angeles, and therefore would not require installation of infrastructure that would exacerbate fire risks or result in temporary or ongoing impacts to the environment. Furthermore, the impacts from installation of new utilities would only be temporary during construction. **Therefore, impacts regarding threshold (c) would be less than significant.**

Threshold (d): ***Would the Project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?***

The project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides related to post-fire instability because the project site is not located on a steep slope or hillside and has been designed with the topography of the site and surrounding areas in mind. **Therefore, there would be no impacts regarding threshold (d) and no further analysis is required.**

4.14.4 Cumulative Impacts

The project would not require the installation or maintenance of infrastructure that may exacerbate fire risk because it is an infill development project in an already urban and developed portion of the City of Los Angeles, and therefore would not require installation of infrastructure that would exacerbate fire risks. It is assumed that any current and future projects would be required to comply with City of Los Angeles Building Code and safety regulations pertaining to development in a very high fire hazard severity zone. The project site is not located in or near a WUI area and it is not located

next to a designated disaster route. The project would be required to comply with City of Los Angeles Building Code and safety regulations pertaining to development in a very high fire hazard severity zone. The new buildings would include materials and fire safety features that would be more fire resistant and safer than the existing buildings. **With compliance with all applicable regulations, the project would have less than significant impacts related to risk of loss, injury or death involving wildland fires. Therefore, cumulative impacts regarding wildfire as a result of the project would be less than significant and would not be cumulatively considerable.**

4.14.5 Mitigation Measures

The proposed project would have no wildfire impacts associated with emergency response and emergency evacuation plans. With compliance with all applicable regulations, the project would have less than significant impacts related to risk of loss, injury or death involving wildland fires. Therefore, impacts regarding wildfire as a result of the project would be less than significant and no mitigation is required.

4.14.6 Level of Significance after Mitigation

No mitigation measures are required for the project. Project-level and cumulative impacts with regards to wildfire would be less than significant.

4.15 Energy

4.15.1 Introduction

This section complies with Public Resources Code § 21100(b)(3) and Appendix F of the California Environmental Quality Act (CEQA) Guidelines by analyzing the potential impacts of the proposed project on energy use and energy resources. In particular, it analyzes whether current and anticipated energy availability is adequate to meet the project's anticipated energy needs. It also includes a discussion of the potential energy impacts of the project, with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy.

4.15.2 Environmental Setting

4.15.2.1 Regulatory Framework

Federal

Corporate Average Fuel Economy (CAFE) Standards

Enacted in 1975, the Corporate Average Fuel Economy (CAFE) Standards aim to reduce energy consumption by improving the fuel economy of cars and light trucks. CAFE standards are regulated by the Department of Transportation's National Highway Traffic and Safety Administration (NHTSA). NHTSA sets and enforces CAFE standards under the Energy Policy and Conservation Act (EPCA) and the U.S. Environmental Protection Agency (USEPA) calculates average fuel economy levels and sets GHG standards under the Clean Air Act (US Department of Transportation, 2014).

Energy Independence and Security Act

Enacted in 2007, the Energy Independence and Security Act (EISA) reinforces energy reduction goals by aiming to increase the production of clean renewable fuels, improve efficiency of products, and promote research on GHG capture options. Additionally, the EISA aims to protect American consumers by moving the United States toward increased energy independence and security. Three primary provisions of the EISA are (1) the CAFE standards, (2) the Renewable Fuel Standard, and (3) the appliance/lighting efficiency standards (USEPA, 2016).

State

California Code of Regulations (CCR) Title 24, Part 6

CCR Title 24, Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24) were first established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.

The Title 24 standards are updated on a three-year schedule, with the most current 2016 standards going into effect on January 1, 2017. The Title 24 standards require the installation of insulated hot water pipes, improved window performance, improved wall insulation, and mandatory duct sealing. Title 24 also requires roofs to be constructed to be solar ready, with cool roofing shingles, a minimum 1-inch air space between roof material and roof deck, and a minimum of R-22 roof/ceiling insulation. All lighting is required to be high efficiency and daylight sensors and motion sensors are required for

outdoor lighting, bathrooms, utility rooms and other spaces. The forced air systems are required to limit leakage to 5% or less and all heat pump systems must be equipped with liquid line filter driers. The 2016 Title 24 Part 6 standards are anticipated to reduce electricity consumption by 281 gigawatt-hours per year and natural gas consumption by 16 million therms per year.

California Code of Regulations (CCR) Title 24, Part 11

CCR Title 24, Part 11: *California Green Building Standards* (Title 24) was developed in response to continued efforts to reduce energy, water, and material consumption. The most current version is the 2016 California Green Building Standards Code (CalGreen), which became effective on January 1, 2017 and replaced the 2013 CalGreen. One focus of CCR Title 24, Part 11 is clean air vehicles and increasing requirements for electric vehicle charging infrastructure, which would reduce pollutant emissions. For new multi-family dwelling units, the residential mandatory measures were revised to provide additional EV charging space requirements, including quantity, location, size, single EV space, multiple EV spaces, and identification.

California Renewable Portfolio Standard

Senate Bill 1078 (SB 1078), enacted in 2002, required retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20% of their supply from renewable sources by 2017. In 2006, Senate Bill 107 (SB 107) changed the target date to 2010. Executive Order S-14-08, signed on November 2008, changed the State's Renewable Energy Standard to 33% renewable energy by 2020. The executive order was codified by Senate Bill X1-2. Finally, Executive Order S-21-09 directed the ARB to adopt regulations by July 31, 2010 to enforce S-14-08.

Senate Bill 350

Senate Bill 350 (SB 350), the Clean Energy and Pollution Reduction Act, was enacted in 2015 and includes aggressive clean energy goals in an effort to address climate change. The law creates new clean energy, clean air, and GHG reduction goals for 2030. SB 350 adopts a GHG reduction target of 40 percent below 1990 levels by setting targets for efficiency and renewable electricity, primarily in the energy and transportation sectors. The Act is part of a larger effort to reduce GHG emissions to 80 percent below 1990 levels by 2050. To implement SB 350, the Energy Commission is working closely alongside the California Public Utilities Commission (CPUC) and the California Air Resources Board (ARB). Additionally, SB 350 tasks states agencies with studying and identifying barriers to, and opportunities for, utilizing clean, renewable energy in low-income communities (California Energy Commission, 2019a).

Senate Bill 100

Senate Bill 100 (SB 100), officially known as "The 100 Percent Clean Energy Act of 2018," requires that public utilities, including electric corporations, must design renewable energy portfolios so that at least 50 percent of all retail sales by 2050 are generated from renewable energy sources. Additionally, incremental goals for 2024 and 2027 are established to monitor progress leading to the final target deadline (California Legislative Information, 2018c).

Assembly Bill 32

In 2006, the California State Legislature adopted Assembly Bill 32 (AB 32), the California Global Warming Solutions Act of 2006. AB 32 requires ARB to adopt rules and regulations that would

achieve GHG emissions equivalent to statewide levels in 1990 by 2020 through an enforceable statewide emission cap which will be phased in starting in 2012. Emission reductions shall include carbon sequestration projects that would remove carbon from the atmosphere and best management practices that are technologically feasible and cost effective.

ARB's AB 32 Scoping Plan, which was adopted in 2009, proposes a variety of measures including strengthening energy efficiency and building standards; targeted fees on water and energy use; a market-based cap-and-trade system; achieving a 33% renewable energy mix; and a fee regulation to fund the program. The 2014 update to the Scoping Plan identifies strategies moving beyond the 2020 targets to 2050.

The cap and trade program established under Scoping Plan sets a statewide limit on sources responsible for 85% of California's GHG emissions, and has established a market for long-term investment in energy efficiency and cleaner fuels since 2012.

Assembly Bill 1493

Assembly Bill 1493 (AB 1493), Vehicular emissions: greenhouse gases, enacted in 2002, establishes regulations to reduce GHG emissions from new passenger vehicles manufactured in the 2009 model year or later. The bill requires the ARB to adopt, by January 2005, regulations that achieve the maximum feasible reduction of GHGs emitted by passenger vehicles, light-duty trucks, and other noncommercial transportation vehicles. In setting reduction targets, the ARB must consider the technological feasibility of regulations, impacts on the state's economy, and industry-specific metrics (California Legislative Information, 2002a).

Low Carbon Fuel Standard

The Low Carbon Fuel Standard (LCFS), adopted in 2009 and implemented in 2011, is designed pursuant to California AB 32 and Executive Order S-01-07. The LCFS is one of nine action measures to reduce California's GHG emissions and emissions that cause climate change and smog-forming pollutants by improving vehicle technology, improving fuel efficiency, and increasing alternative transportation options. The LCFSs encourage production and use of clean low-carbon fuels across the state and establish a ten percent reduction in carbon intensity of fuel products by 2020. Moreover, providers of transportation fuels in the state must meet LCFS carbon intensity standards for each annual compliance period. The ARB administers the LCFS (California Air Resources Board, 2019a).

California Air Resources Board (ARB) Advanced Clean Cars Regulation

The Advanced Clean Cars regulation was adopted in 2012 by the ARB in an effort to reduce emissions from passenger vehicles. Regulations were developed in coordination with the USEPA and NHTSA, and aim to control criteria pollutants and GHG emissions. The program aims to promote the development of environmentally advanced cars that promote high performance while also reducing smog-forming pollution and GHG emissions (California Air Resources Board, 2019b).

ARB - Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling

The ARB Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling[82] was adopted to reduce public exposure to particulate matter and associated toxic air contaminants

82 13 CCR § 2485.

by establishing restrictions, emissions standards, and other requirements for heavy-duty diesel engines. The regulation applies to any person, business, or agency that operates diesel-fueled vehicles within the State of California. A primary requirement is that drivers may not idle diesel engines for greater than five minutes at any location.[83]

ARB - Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and other Criteria Pollutants, from In-Use Heavy-Duty Diesel-Fueled Vehicles

Title 13, Section 2025, Article 4.5 aims to reduce emissions of diesel particulate matter, NO_x, and other criteria pollutants. The regulation applies to any owner or operator of heavy-duty vehicles that operate on diesel fuel, dual fuel, or alternative diesel fuel, in the state of California. Owners must comply with the best available control technology (BACT) requirements of § 2025(f) to reduce emission of harmful pollutants and further the State's goals to fight climate change (California Air Resources Board, 2008).

Sustainable Communities and Climate Protection Act of 2008- SB 375

SB 375 promotes the State's climate goals by helping reduce GHG emissions through coordinated transportation, housing, and land use planning. Under SB 375, the ARB creates regional targets for GHG reductions from passenger vehicles for 2020 and 2035 for the 18 metropolitan planning regions. The targets were last updated in 2018. In accordance with SB 375, each MPO must develop a Sustainable Communities Strategy (SCS) that would allow the region to meet the ARB's targets. Additionally, SB 375 provides incentives to encourage sustainable development, including CEQA exemptions (California Air Resources Board, 2019c).

In compliance with SB 375, the Southern California Association of Governments (SCAG) adopted its 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS): Towards a Sustainable Future. The most recent update to the plan was adopted in April 2016, and includes a planning vision through 2040. A primary goal of the plan is to promote mobility and transportation services across the SCAG region, and in turn, meet goals set by the ARB. The RTP/SCS applies to six counties under SCAG's jurisdiction: Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. The three principles that guide the region's plan are mobility, economy, and sustainability. The SCAG RTP/SCS addresses air quality challenges, transportation challenges, potential investment opportunities, and a financial plan identifying funds available to support the region's plans. The plan has an emphasis on adopting land use strategies that promote urban infill growth, walkable, mixed-use communities, and energy-efficient housing types such as townhomes and smaller single-family homes (Southern California Association of Governments, 2016).

Assembly Bill 758

Assembly Bill 758 (AB 758), adopted in 2009, requires the California Energy Commission (CEC) to develop a comprehensive program to achieve greater energy savings in the state's residential and nonresidential buildings. AB 758 requires publicly-owned electric utilities to implement energy efficiency programs that encourage energy savings in GHG reductions and report its implementation status to the state. Programs may include, but are not limited to, upgrading infrastructure or providing consumers with information on energy usage (California Legislative Information, 2009).

83 13 CCR § 2485(c)(1)B).

Senate Bill 1389

Senate Bill 1389 (SB 1389), adopted in 2002, requires the CEC to develop an integrated energy policy report on or before November 2003, and every two years thereafter. The bill requires the commission to conduct assessments and forecasts to evaluate energy supply, production, distribution, demand and price (California Legislative Information, 2002b). The most recent report was completed in February 2019 and includes, "an integrated assessment of major energy trends and issues facing California's electricity, natural gas, and transportation fuel sectors." The report also provides policy guidance to conserve natural resources, protect the environment, and ensure adequate energy supplies while furthering the state's economic growth and protection public health (California Energy Commission, 2019b).

California Environmental Quality Act

Appendix F of the CEQA Guidelines, titled Energy Conservation, identifies the state's goals of conserving energy and presents means of achieving the goal, including decreased per capita energy consumption, decreased reliance on natural gas, and increasing reliance on renewable energy. To ensure that energy implications are considered when assessing proposed projects, CEQA requires that environmental impact reports (EIRs) discuss potential energy impacts with an emphasis on reducing inefficient consumption of energy. Appendix F details the manner in which impacts to energy must be addressed in various parts of an EIR, including, but not limited to, the project description, mitigation measures, and alternatives.

Assembly Bill 1109

California Assembly Bill 1109 (AB 1109), also known as the Lighting Efficiency and Toxics Reduction Act, requires reductions in energy usage for lighting and is structured to reduce lighting electrical consumption by (1) at least 50% from 2007 levels for indoor residential lighting and (2) at least 25% from 2007 levels for indoor commercial and all outdoor lighting by 2018.

Senate Bill 1368

Senate Bill 1368 (SB 1368) is the companion Bill of AB 32 and was adopted September, 2006. SB 1368 requires the CPUC to establish a performance standard for baseload generation of GHG emissions by investor-owned utilities by February 1, 2007 and for local publicly-owned utilities by June 30, 2007. These standards could not exceed the GHG emissions rate from a baseload combined-cycle, natural gas-fired plant. Furthermore, the legislation states that all electricity provided to the State, including imported electricity, must be generated by plants that meet the standards set by CPUC and California Energy Commission.

Regional

As discussed above, SCAG's 2016-2040 RTP/SCS was adopted in April 2016. The plan has a long-range vision to balance forecasted mobility and housing needs with economic, environmental, and public health goals. It focuses on integrating land use and transportation to promote smart and sustainable growth. The 2016 RTP/SCS allocates approximately $556.5 billion in transportation system investments throughout its lifetime. Through these investments and additional land use and economic development initiatives, SCAG hopes to create communities that are more compact and connected by a wide range of public transit options for individuals at all income levels. Methods of

achieving its goals include an emphasis on "High Quality Transit Areas, Livable Corridors, and Neighborhood Mobility Areas."

The SCAG RTP/SCS would result in an eight percent reduction in greenhouse gas emissions per capita by 2020, an 18 percent reduction by 2035 and a 21 percent reduction by 2040 – compared with 2005 levels. This meets or exceeds the state's mandated reductions, which are eight percent by 2020 and 13 percent by 2035. Additionally, the plan would reduce the amount of previously undeveloped (greenfield) lands converted to more urbanized uses by 23 percent. By conserving open space and other rural lands, the Plan provides a solid foundation for more sustainable development in the SCAG region.

The RTP/SCS, required by the State of California and the federal government, is updated by SCAG every four years as demographic, economic and policy circumstances change. The plan is developed in collaboration with local governments, local stakeholders, transportation authorities, businesses, and other interested parties within SCAG's six-county jurisdiction (SCAG, 2016).

Local

City of Los Angeles Green Building Code

On December 20, 2016, the Los Angeles City Council approved Ordinance No. 184,692, which amended Chapter IX of the Los Angeles Municipal Code (LAMC), referred to as the "Los Angeles Green Building Code," by amending certain provisions of Article 9 to reflect local administrative changes and incorporating by reference portions of the 2016 CALGreen Code. Projects filed on or after January 1, 2017 must comply with the provisions of the Los Angeles Green Building Code. Specific mandatory requirements and elective measures are provided for three categories: (1) low-rise residential buildings; (2) nonresidential and high-rise residential buildings; and (3) additions and alterations to nonresidential and high-rise residential buildings. Article 9, Division 5 includes mandatory measures for newly constructed nonresidential and high-rise residential buildings.

City of Los Angeles Green LA Action Plan/ClimateLA

In May 2007, The City of Los Angeles released "Green LA: An Action Plan to Lead the Nation in Fighting Global Warming." The primary focus of the plan is to reduce GHG emissions to 35% below 1990 levels by the year 2030 through the use of renewable energy, green building policies, waste diversion, and changing land use and transportation patterns to reduce automobile dependency. In order to save energy, the City of LA upgraded fixtures in city-owned buildings and converted traffic signals to LED lights. Additionally, the City is increasing energy rebates for community residents. To further increase reduction in GHGs, a Green Building Program was signed into Law in April 2008. The program is expected to reduce the city's carbon emissions by more than 80,000 tons (Cool California, 2019).

City of Los Angeles Solid Waste Programs and Ordinances

Zero Waste LA was adopted in 2017 and works to address the 3 million tons of waste disposed annually within the city. The system establishes a waste and recycling collection program for all commercial, industrial, and large multi-family customers in the City of Los Angeles. "The program aims to reduce landfill disposal by 1 million tons per year by 2025 and reduce waste by 65% in all 11 of the City's new service zones. The program will also decrease food waste and provide all Angelenos with Blue Bin access, no matter where they live or work." The city will invest $200 million

in new and improved solid resources infrastructure, clean vehicles, and decrease food waste (Office of Jose Huizar, 2017).

City of Los Angeles General Plan Framework

The City of Los Angeles General Plan Framework guides the update of the community plan and Citywide elements. Chapter 9, Infrastructure and Public Services, identifies goals, objectives, and policies for utilities in the City.

Los Angeles Department of Water and Power

The Los Angeles Department of Water and Power (LADWP's) 2017 Final Power Strategic Long-Term Resource Planning (SLTRP) identifies actions that are central to the continued reliability of the LADWP Power System while meeting all regulatory requirements and limiting rate impact on customers. The 2017 Power SLTRP provides detailed analysis and results of the updated Power SLTRP resource cases, which investigated the economic and environmental impact of increased Renewable Portfolio Standard, local solar, energy storage, and various levels of transportation electrification within a 20-year horizon. Starting in 2018, the Power SLTRP will extend through 2050 to better align with Statewide greenhouse gas emissions goals and align with the Los Angeles 100% clean energy initiative.

LADWP is focusing on both near-term and long-term solutions. To achieve the objectives and goals documented in the 2017 SLTRP, LADWP will continue to implement its existing programs and projects, but will also introduce and expand new initiatives and program areas.

4.15.2.2 Existing Conditions

Electricity

Electricity is provided to the Project site by the Los Angeles Department of Water and Power (LADWP). LADWP supplies more than 26 million megawatt-hours of electricity a year for the City's 1.5 million residential and business customers. The average resident uses about 5,900 kilowatt hours (kWh) of electricity per year. Business and industry consume about 70% of the electricity in Los Angeles, but residents constitute the largest number of customers. In addition to serving these consumers, the LADWP lights public streets and highways, powers part of the City's water system, and sells electricity to other utilities (LADWP, 2018a).

The LADWP provides electricity to the Project site from existing underground electrical service lines. In 2017, the LADWP's power portfolio comprised 30% renewable energy (including 1% biomass, 4% geothermal; 4% small hydroelectric; 11% solar; and 10% wind). Thirty-one percent of the power is from natural gas, 10% is from nuclear power, 4% is from large hydroelectric sources; 18% is from coal and 7% is from other/unspecified sources of power (LADWP, 2017a).

To improve system reliability and to ensure that power supplies continue to meet the needs of the City of Los Angeles for the next 100 years, the LADWP has prepared the 2017 Power Strategic Long-term Resource Plan (SLTRP), an aggressive program to enhance generation capacity, modernize transmission and distribution infrastructure, assure power quality, and identify cost-saving, environmentally sensitive efficiencies (LADWP, 2018b).

LADWP is in the process of transforming its power system. Approximately 70% of its power system generation will be replaced within the next 14 years. Numerous challenges are being addressed concurrently, including meeting renewable resource requirements, once-through cooling, natural gas repowering, coal replacement, GHG reduction, energy efficiency, demand response programs, transportation electrification and others. Meeting all of these challenges requires considerable amounts of labor and capital resources, which applies upward pressure on LADWP's electric rates (LADWP, 2017b).

Natural Gas

More than 90% of the natural gas used in California is produced from basins in Texas and New Mexico. Southern California Gas Company (SoCalGas) has a "network of transmission pipelines and four interconnected storage fields to deliver natural gas to nearly 6 million residential and business customers. The gas transmission system extends from the Colorado River on the east of SoCalGas' approximately 20,000 square mile service territory, to the Pacific Coast on the west, and from Tulare County to the north, to the United States/Mexico border to the south supporting 21 million consumers of Southern California. SoCalGas operates four storage facilities that interconnect with its gas transmission system. These storage facilities – Aliso Canyon, Honor Rancho, La Goleta, and Playa del Rey – are located near the primary load centers of the SoCalGas system" (SoCalGas, 2019). In 2017, residential natural gas consumption in Los Angeles County was 1116.125569 million therms.[84] This is equivalent to 1.12×10^{14} BTU per year.

Transportation Energy[85]

According to the CEC, transportation accounted for nearly 37 percent of California's total energy consumption in 2014. In 2018, onroad motor vehicles in Los Angeles County consumed 3.38 billion gallons of gasoline and 561 million gallons of diesel fuel.[86] Petroleum-based fuels currently account for 90% of California's transportation energy sources. However, as discussed in previous sections. the state has been working for over a decade on developing strategies and regulations for reducing petroleum use, such as use of alternative fuels and reducing vehicle miles traveled. Although total petroleum fuel use in Los Angeles County increased by 4.1% from 2010 through 2018, per-capita gasoline use decreased from 1.15 gallons per day to 1.12 gallons per day, about 2.8%.[87] The CEC predicts that the demand for gasoline will continue to decline over the next ten years, and that there will be an increase in the use of alternative fuels.

4.15.3 Project Impacts

The analysis of energy in this section addresses the proposed Project's potential for energy use, which includes electricity, natural gas, and transportation-related energy use (i.e., petroleum fuel use). This section addresses both short-term construction and long-term operational energy use. The estimate of the proposed Project's energy is based upon information provided by the project

84 Data from California Energy Commission, Gas Consumption by County. Available at http://ecdms.energy.ca.gov/gasbycounty.aspx. Downloaded June 19, 2019.

85 The following discussion, except where otherwise referenced, is based upon a section of the Paseo Marina Project Draft Environmental Impact Report (Eyestone Environmental, 2019).

86 Data from California Air Resources Board EMFAC2017 (v1.0.2) Emissions Inventory; values are projections based upon assumptions regarding vehicle population growth and fleet characteristics, and implementation schedules for fuel efficiency standards.

87 2010 and 2018 Los Angeles County populations are 9,818,605 (U.S. Census, https://www.census.gov/prod/cen2010/doc/dpsf.pdf) and 10,283,729 (SCAG, 2019b, p. 3), respectively.

applicant and the results of California Emissions Estimator Model (CalEEMod) modeling. (See **Section 4.15.3.2**.)

4.15.3.1 Thresholds of Significance

CEQA requires that EIRs include a discussion of the potential energy impacts of a proposed project, with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy. Public Resources Code § 21000(b)(3) states that an Environmental Impact Report (EIR) must discuss "mitigation measures proposed to minimize significant effects on the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy." CEQA Guidelines § 15126.4 (a)(1)(C) states that energy conservation measures, as well as other appropriate mitigation measures, shall be discussed when relevant. For this analysis, the Appendix G thresholds listed below are relied upon.

Examples of energy conservation measures are provided in Appendix F, Energy Conservation, of the CEQA Guidelines**.** Per Appendix F, "Potentially significant energy implications of a project shall be considered in an EIR to the extent relevant and applicable to the project."

In accordance with Appendix G of the State CEQA Guidelines, the project would have a significant impact related to energy if it would:

Threshold (a): ***Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or***

Threshold (b): ***Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.***

The City of Los Angeles Thresholds Guide (City of Los Angeles Environmental Affairs Department, 2006, p. M.4-3) states that a significance determination must be made on a case-by-case basis, considering the following factors:

- The extent to which the project would require new (off-site) energy supply facilities and distribution infrastructure or capacity-enhancing alterations to existing facilities.
- Whether and when the needed infrastructure was anticipated by adopted plans.
- The degree to which the project design and/or operations incorporate energy conservation measures, particularly those that go beyond City requirements.

In addition, according to the CEQA Guidelines, Appendix F and the City of Los Angeles Thresholds Guide (City of Los Angeles Environmental Affairs Department, 2006, p. M.4-3) the following criteria may be considered, where applicable, in determining whether energy significance thresholds are reached or exceeded:[88]

88 Criteria 1 through 6 are from the CEQA Guidelines, Appendix F, and criteria 7 and 8 are from the Los Angeles CEQA Thresholds Guide.

1. The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project, including construction, operation, maintenance and/or removal. If appropriate, the energy intensiveness of materials may be discussed.

2. The effects of the project on local and regional energy supplies and on requirements for additional capacity.

3. The effects of the project on peak and base period demands for electricity and other forms of energy.

4. The degree to which the project complies with existing energy standards.

5. The effects of the project on energy resources.

6. The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

7. The degree to which the project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements.

8. Whether the project conflicts with adopted conservation plans.

4.15.3.2 Methodology for Quantitative Analyses

Construction

The following forms of energy would be expended during construction:

- Diesel fuel for offroad equipment (gallons).
- Electricity to deliver water to Los Angeles for use in dust control (kWh).
- Motor vehicle fuel for worker commuting, materials delivery and waste disposal (gallons).

Natural gas is not typically consumed during project construction. It was therefore omitted from the analysis. The number of horsepower-hours of each offroad equipment type was calculated using equipment characteristics and scheduling generated by CalEEMod for the air quality and greenhouse gas emissions analyses (see **Section 4.2**). Horsepower hours were multiplied by a fuel use rate of 0.05 gallon of diesel fuel per horsepower hour (SCAQMD, 1993, Table A9-3E). Calculations are shown in Tables P-1 and P-2 in **Appendix P.**

A relatively small amount of electricity would be used for power drills and other equipment during construction. This analysis assumes that an onsite portable diesel-fueled generator will supply the electricity. Air emissions and noise from the generator have been evaluated in **Section 4.2** and **Section 4.9**, respectively.

The analysis did estimate the amount of electricity required to transport and treat water to the Los Angeles area for ultimate use as a dust suppressant. It was assumed that 3,020 gallons would be needed per acre watered per day.[89] CalEEMod assumes that 0.009727 kWh of electricity are required

89 Cited by Eyestone Environmental, 2019, Appendix P.

per gallon of delivered water in Southern California (CEC, 2016). Calculations are shown in Table P-3 in **Appendix P**.

Petroleum-based fuels (i.e., gasoline) would be consumed during the construction phase of the proposed Project. Petroleum-based fuels would be consumed via offroad construction vehicles/equipment, gasoline consumed by construction workers traveling to and from the project site, as well as equipment delivery and hauling of demolition material offsite and building material to the site. Onroad vehicle miles traveled (VMT) for each construction subphase and each of the three trip types were calculated from results of the CalEEMod modeling. It was assumed that worker commuter vehicles were gasoline-powered and the remainder were diesel-powered. Composite fuel efficiencies (in miles per gallon) for gasoline and diesel vehicles in the South Coast Air Basin were calculated with the ARB EMFAC2014 model.[90] Finally, VMT values were divided by fuel efficiencies to obtain fuel volumes used for construction. Calculations are shown in Table P-4 in **Appendix P**.

Operation

The following forms of energy would be expended during project operations:

- Natural gas for space and water heating.
- Electricity for domestic needs, street lighting, and conveyance and treatment of water.
- Gasoline for onroad motor vehicles.

CalEEMod was used to calculate natural gas, electricity (used onsite and for water conveyance), and vehicle miles traveled under existing conditions and after project buildout.[91] It was assumed that conveyance and treatment of water for outdoor use required 0.00927 kWh per gallon. For water for indoor use, the electricity requirement was assumed to be 0.0111 kWh per gallon. Calculations are shown in Table P-5 in **Appendix P**.

For mobile sources, CalEEMod calculated VMT and vehicle fleet mix for existing conditions and project buildout. Conversion of results to energy values is shown in Table P-6 in **Appendix P**.

4.15.3.3 Analysis of Project Impacts

Threshold (a): ***Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?***

and

Threshold (b): ***Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?***

According to the CEQA Guidelines, "[u]ses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts

90 Composite fuel efficiencies presented in Keystone Environmental, 2019, Appendix P.

91 CalEEMod runs used for this analysis are in **Appendix G1.1** and **Appendix G1.6**. The electricity rates for water treatment and conveyance are from CEC, 2016,

(such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified." Therefore, the purpose of this analysis is to identify any significant irreversible environmental effects of project implementation that cannot be avoided.

In evaluating potential energy impacts, it is necessary to take into account certain project design features that would reduce energy use. These were introduced in the analysis of greenhouse gas emissions, in **Section 4.6.3.3**. In general, they include:

GHG-PDF-1: Exceeding Title 24, Part 6, California Energy Code baseline standard requirements for energy efficiency, based on the 2016 Building Energy Efficiency Standards requirements.

GHG-PDF-2: Use of high-efficiency Energy Star appliances, where appropriate.

Seven water conservation measures (**GHG-PDF-3** through **GHG-PDF-6** and **GHG-PDF-8** through **GHG-PDF-10**): reducing water use cuts down on the energy needed to treat water, transport it to the residences, and treat it after it is disposed.

GHG-PDF-7: Prohibiting the use of fossil-fueled fireplaces in the proposed residential units.

These design features will help ensure that the project will not have "wasteful, inefficient, or unnecessary consumption of energy resources," during project construction or operation.

Both construction and operation of the project would lead to the consumption of limited, slowly renewable, and non-renewable resources, committing such resources to uses that future generations would be unable to reverse. The new development would require the commitment of resources that include: (1) building materials; (2) fuel and operational materials/resources; and (3) the transportation of goods and people to and from the project.

Construction

<u>Electricity</u>

During project construction, energy would be consumed in the form of electricity associated with the conveyance and treatment of water used for dust control and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power.

Electricity use for project construction was estimated by the methods described in **Section 4.15.3.2.** The analysis did not include electricity from the onsite electrical generator. Due to the fact that electricity usage associated with lighting and construction equipment that utilizes electricity is not easily quantifiable or readily available, the estimated electricity usage during project construction is speculative. During project construction, which includes a demolition phase, the amount of energy used onsite would incrementally decrease because the existing units/buildings that use electricity would be removed from the project site during the demolition phase.

Lighting used during project construction would comply with Title 24 standards/requirements (such as wattage limitations). This compliance will ensure that electricity use during project construction

would not result in the wasteful, inefficient, or unnecessary use of energy. Lighting will be used in compliance with all City of Los Angeles Municipal Code requirements to create enough light for safety. As shown in **Table 4.15-1** below, 3,238 kWh of electricity are anticipated to be consumed during project construction. **Therefore, the proposed Project is anticipated to have a less than significant impact related to the demand for electricity during project construction.**

Table 4.15-1
PROJECT CONSTRUCTION ENERGY USE SUMMARY

Energy Medium	Quantity
Electricity for Water Conveyance and Treatment	
Phase I	1,157 kWh
Phase II	2,080 kWh
Total Electricity	**3,238 kWh**
Gasoline	
Off-Road	0 gallons
On-Road, Phase I and II Combined	12,443 gallons
Total Gasoline	**12,443 gallons**
Diesel	
Off-Road, Phase I	24,267 gallons
Off-Road, Phase II	24,120 gallons
On-Road, Phase I and II Combined	1,104 gallons
Total Diesel	**49,491 gallons**

Notes:
kWh = Kilowatt hour
Source: UltraSystems, 2019; See **Appendix P**.

Natural Gas

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. **Therefore, the proposed Project is not anticipated to have a demand for natural gas during project construction.**

Transportation Energy

Project construction would consume energy in the form of petroleum-based fuels associated with the use of offroad construction vehicles and equipment on the Project site, construction worker travel to and from the project site, and delivery and haul truck trips hauling solid waste from and delivering building materials to the project site. As shown in **Table 4.15-1**, 12,443 gallons of gasoline and 49,941 gallons of diesel fuel are estimated to be consumed during construction.

During project construction, trucks and construction equipment would be required to comply with ARB's anti-idling regulations. ARB's In-Use Off-Road Diesel-Fueled Fleets regulation would also apply. Vehicles driven to or from the project site (delivery trucks, construction employee vehicles,

etc.) are subject to fuel efficiency standards requirements established by the Federal Government. **Therefore, Project construction activities regarding fuel use would not result in wasteful, inefficient, or unnecessary use of energy and impacts would be less than significant.**

Operation

During project operations, energy would be consumed for space and water heating, water conveyance, solid waste disposal, and vehicle trips. Estimated project operation energy usage, which was estimated by CalEEMod as part of the greenhouse gas emissions analysis,[92] is shown in **Table 4.15-2.**

Electricity

Under the Project, all the existing buildings will be demolished and 185 new housing units will be built, along with a community building, landscaping, and recreational amenities. The project would comply with all applicable regulations and codes that require achievement of various levels of energy efficiency in building construction, design and operation. As seen in **Table 4.15-2**, electricity use per resident[93] is predicted to decrease by about 32%.

Natural Gas

As depicted in **Table 4.15-2** below, there would be an approximately 25% decrease in per-capita natural gas use associated with operations of the proposed Project, compared to existing conditions. This reflects efficiencies achieved by Title 24 and other energy-reducing regulations and programs.

Transportation Energy

As seen in **Table 4.15-2**, total VMT are projected to increase by about 1,181,329 vehicle-miles per year. However, VMT per capita are projected to decrease substantially as result of the project. Per-capita VMT will be about 37% lower.[94] As a result, per-capita consumption of gasoline and diesel fuels will decrease by a comparable amount.

Further, the roadway network in the vicinity of the Project site is served by the Los Angeles County Metropolitan Transportation Authority (Metro). Residents, employees, and visitors would be able to access the project site via Metro's public transit system, thereby reducing transportation-related fuel demand.

Regulations and codes described above under **Section 4.15.2** limit the amount of energy consumed by new development. Nevertheless, the consumption of such resources would represent a long-term commitment of those resources. The commitment of resources required for the construction and operation of the project would limit the availability of such resources for future generations or for other uses during the life of the project. However, continued use of such resources is consistent with the anticipated growth within the City and the general vicinity and would not result in energy

92 See **Section 4.6** of the EIR.

93 Current and future numbers of residents are 221 and 656, respectively. (See **Section 4.10** for site population estimates.). Energy intensity in this evaluation was not on a housing unit basis because of the large increase in onsite density; the number of persons per unit would increase from 2.21 to 3.6. Using a per-unit basis would mask the benefits of the project's energy-reducing features.

94 VMT per housing unit would be about the same, since the same trip generation factor was applied to all the existing units and all but two of the future units.

consumption requiring a significant increase in energy production for the energy provider. **Therefore, the energy demand associated with Project operations would be less than significant.**

Table 4.15-2
ESTIMATED PROJECT OPERATIONAL ENERGY USE

Energy Type	Units	Existing		Future		Change		
		Value	Per Capita	Value	Per Capita	Value	Per Capita	% Change
Onroad Motor Vehicle Travel	Vehicle Miles Traveled per Year	1,362,955	6,167	2,544,284	3,878	1,181,329	(2,289)	(37)
	Gallons Gasoline	83,465	378	105,829	161	22,364	(216)	(57)
	Gallons Diesel Fuel	9,859	45	15,740	24	5,881	(21)	(46)
Natural Gas Use	1,000 BTU per year	1,053,780	4,768	2,353,868	3,588	1,300,088	(1,180)	(25)
Electricity Use	Kilowatt-hours per year	360,247	1,630	725,194	1,105	364,947	(525)	(46)
Water Conveyance	Kilowatt-hours per year	112,275	508	207,709	317	95,434	(191)	(38)

Source: CalEEMod and UltraSystems; see **Appendix P** for assumptions and calculations.
Existing population = 221; future population = 656.

Additional Analysis

The Project was also reviewed against the eight specific energy significance criteria specified in CEQA Guidelines, Appendix F and the City of Los Angeles Thresholds Guide. The results of the review are as follows.

1. *The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project, including construction, operation, maintenance and/or removal. If appropriate, the energy intensiveness of materials may be discussed.*

   As detailed in the preceding subsections, project construction will require relatively little electricity and no natural gas. (See **Table 4.15-1**.) Gasoline and diesel fuel use for onsite construction will be limited by increasing stringent requirements on engine efficiency and idling times. During project operations (when the new units are occupied), it is demonstrated in **Table 4.15-2** that per-capita consumption of electricity, natural gas, and transportation fuels will decrease, due to adherence to efficiency standards, project design features that go beyond regulatory requirements, and increasing density on the project site. The amount of electrical energy and transportation fuel required is not wasteful and can easily be satisfied by existing capacities of electrical energy and motor fuels. **As a result, the Project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.**

2. *The effects of the project on local and regional energy supplies and on requirements for additional capacity.*

   As stated in **Section 4.15.2.2**, the LADWP supplies 26 million megawatt-hours of electricity to its residential and industrial customers annually. The Project will result in an increase of 364,947 kilowatt-hours of electrical demand. This will represent an 0.0014% increase in demand. This is far below the amount necessary to have a significant impact on the LADWP's ability to supply electricity in the region. No additional capacity will be needed.

   As also stated in **Section 4.15.2.2**, Residential customers in Los Angeles County used 1.12×10^{14} BTU of natural gas in 2017. As shown in **Table 4.15-2**, the Project site's natural gas use will increase by 1,300,088 BTU after the project is built. Thus, the demand will increase by about 0.0000012%. This is far below the amount necessary to have a significant impact on SoCalGas' ability to supply natural gas in the region. No additional capacity will be needed.

   In 2018, onroad motor vehicles in Los Angeles County used 3.38 billion gallons of gasoline and 561 million gallons of diesel fuel.[95] As shown in **Table 4.15-2**, the project is estimated to increase gasoline and diesel fuel use by 22,364 and 5,881 gallons per year, respectively. These increases are 0.0007% and 0.0010%, respectively. This is far below the amount necessary to have a significant impact on motor fuel distributors ability to supply gasoline and diesel fuel in the region. No additional capacity will be needed.

   As energy consumption during project construction would be relatively negligible, the Project would not have a significant effect on regional energy consumption during the

95 See Section 4.15.2.2.

construction phase. During project operation, it is anticipated that the LADPW, SoCalGas, and motor fuel suppliers will have adequate supplies to meet project energy demands, without the need to expand their capacities.

3. *The effects of the project on peak and base period demands for electricity and other forms of energy.*

   The Project would continue to have the same pattern of energy use. As noted in the analysis for the previous criterion, the project will contribute a very small amount to annual demands for energy use, and its proportionate demand for baseline and peak periods would similarly be negligible.

4. *The degree to which the project complies with existing energy standards.*

   As noted above, the Project would comply with all applicable regulations and codes which require achievement of various levels of energy efficiency in building construction, design and operation. In addition, the project design features described above, will result in savings beyond those required by the regulations and codes.

5. *The effects of the project on energy resources.*

   To the extent that the Project consumes fossil fuels, it will permanently decrease the world's energy resources. However, the project would comply with all applicable regulations and codes which require achievement of various levels of energy efficiency in building construction, design and operation, so that use of all energy sources (including fossil fuels) will be lower than they would be without the regulations. In addition, the statewide and City-specific regulations and plans described in Section 4.15.2.1 will make it easier to use renewable energy resources and therefore slow the depletion of fossil fuel resources.

6. *The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.*

   As discussed under the second criterion above, the Project's transportation energy requirements are relatively small, and per-capita fuel use will decrease. In addition, residents will be able to use readily available and nearby public transit services, to further reduce energy use.

7. *The degree to which the project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements*.

   Project design features that incorporate energy conservation measures were presented above.

8. *Whether the project conflicts with adopted conservation plans.*

   The project will not conflict with any adopted conservation plan. Building design will comply with applicable provisions of the City of Los Angeles Green Building Code. In addition, the Project is compatible with the 2016-2040 RTP/SCS because it will decrease per-capita VMT. It is also located in a high-quality transit area, so that Metro buses are a real alternative to

passenger car travel. The project's energy saving features result in decreases in per capita consumption, blunting the energy impacts of population growth.

Based on the information provided above, the proposed Project would have a less than significant impact regarding wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. The Project would also have a less than significant impact regarding conflict with or obstruction of a state or local plan for renewable energy or energy efficiency.

4.15.4 Cumulative Impacts

Threshold (a): Would the Project result in wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

Cumulative impacts are defined by the CEQA Guidelines Section 15355 as "two or more individual effects, which when considered together, are considerable or which compound or increase other environmental impacts." Additionally, CEQA Guidelines Section 15355(b) states that "The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely-related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time." As detailed in **Section 3.0** of this document, seven related projects are located in the vicinity of the proposed Project. The geographic area for which cumulative impacts would occur for both electricity and gas would be the service areas for the electricity provider (Los Angeles Department of Water and Power) and natural gas provider (Southern California Gas Company).

Electricity

The commitment of resources required for the construction and operation of the project would limit the availability of such resources for future generations or for other uses during the life of the project. However, continued use of such resources is consistent with the anticipated growth within the City and the general vicinity and would not result in energy consumption requiring a significant increase in energy production for the energy provider. Additionally, as is the case with the proposed Project, current and future cumulative projects would be required to incorporate energy conservation measures into project design, such as CALGreen regulations and California Energy Standards per title 24, as well as mitigation measures, as warranted, to reduce potential energy impacts. Therefore, the energy demand associated with the project in conjunction with cumulative projects would be less than significant.

The proposed Project's contribution to cumulative energy impacts from electricity use would not result in a cumulatively considerable impact regarding wasteful, inefficient, and unnecessary consumption of energy during either the construction or operational phase. Impacts from the Project's electricity use would not be cumulatively considerable. Therefore, impacts in this regard would be less than significant.

Natural Gas

The proposed Project would increase the amount of natural gas used onsite upon project operation due to the increased number of dwelling units, compared to existing conditions. However, the use of natural gas would be on a small scale (an additional 85 units compared to existing conditions).

Additionally, as discussed above, Southern California Gas Company utilizes several different sources for obtaining natural gas for its customers.

The 2018 California Gas Report presents a comprehensive outlook for natural gas requirements and supplies for California through the year 2035 (California Gas and Electric Utilities, 2018, p. 2). Additionally, the California Gas Report states that "California natural gas demand, including volumes not served by utility systems, is expected to decrease at a rate of 0.5 percent per year from 2018 to 2035… Residential gas demand is expected to decrease at an annual average rate of 1.4 percent" (California Gas and Electric Utilities, 2018, p. 4). Regarding energy supply, "California's existing gas supply portfolio is regionally diverse and includes supplies from California sources (onshore and offshore), Southwestern U.S. supply sources (the Permian, Anadarko, and San Juan basins), the Rocky Mountains, and Canada. The Ruby Pipeline came online in 2010, bringing up to 1.5 billion cubic feet per day of additional gas to California (via Malin) from the Rocky Mountains. The Energía Costa Azul LNG (Liquefied Natural Gas) receiving terminal in Baja California provides yet another source of supply for California and also Mexico" (California Gas and Electric Utilities, 2018, p. 12).

The proposed Project's contribution to cumulative energy impacts from natural gas use would not result in a cumulatively considerable impact regarding wasteful, inefficient, and unnecessary consumption of energy during either the construction or operational phase. Impacts from the Project's natural gas use would not be cumulatively considerable. Therefore, impacts in this regard would be less than significant.

<u>Transportation Energy</u>

At buildout, the proposed Project's petroleum-based fuel usage is estimated to be 94,932 gallons of gasoline and 10,909 gallons of diesel fuel per year. Los Angeles County remains a major energy producer - the second largest oil-producing county in California after Kern County. There are currently 68 active oil fields in the Los Angeles Basin, and thousands of active and inactive oil and gas wells countywide. Los Angeles County is also home of the two largest refineries in California (the Chevron Refinery in El Segundo and the Tesoro Refinery in Carson), as well as others (e.g., Torrance Refinery) (Our County Energy Briefing, 2018, p. 7). Therefore, transportation-related energy is being produced by various sources within the County of Los Angeles. Less than significant cumulative transportation energy impacts are anticipated due to the limited nature of the proposed Project and that its location near existing bus transit stops and, as described in the Transportation section of this document, would not result in a significant transportation impact.

The proposed Project's contribution to cumulative energy impacts from transportation fuel use would not result in a cumulatively considerable impact regarding wasteful, inefficient, and unnecessary consumption of energy during either the construction or operational phase. Impacts from the Project's transportation fuel use would not be cumulatively considerable. Therefore, impacts in this regard would be less than significant.

Conclusion

Based on the discussion above, the proposed Project's contribution to cumulative energy impacts (including electricity, natural gas, and transportation fuel use) would not result in a cumulatively considerable impact regarding wasteful, inefficient, and unnecessary consumption of energy during either the construction or operational phase. Impacts from the Project's energy use would not be cumulatively considerable. Therefore, impacts in this regard would be less than significant.

Threshold (b): Would the Project conflict with or Obstruct a State or Local Plan for Renewable Energy or Energy Efficiency

Cumulative projects would require energy resources. Each of these projects will undergo review under CEQA, would be required to comply with applicable energy conservation standards (i.e., Title 24 standards) and mitigation measures will be implemented, if required, for each of these cumulative projects. The proposed Project would similarly be constructed in compliance with all applicable regulations regarding energy conservation (i.e., Title 24 standards).

Conclusion

Based on the discussion above, the proposed Project would not have a cumulative impact regarding conflict with or obstruction with a state or local plan for renewable energy or energy efficiency. Therefore, the proposed Project, in conjunction with other projects would not have a cumulatively considerable impact regarding conflict with or obstruction with a state or local plan for renewable energy or energy efficiency. Cumulative impacts regarding energy would be less than significant.

4.15.5 Mitigation Measures

Project-level and cumulative impacts with regard to energy use and infrastructure would be less than significant. Therefore, no mitigation measures are required.

4.15.6 Level of Significance after Mitigation

Project-level and cumulative impacts related to energy use and infrastructure would be less than significant without mitigation.

SECTION 5.0 - ALTERNATIVES

5.0 ALTERNATIVES

5.1 Introduction

An essential aspect of the environmental review process under CEQA is the identification and analysis of alternatives to a proposed project. Specifically, Public Resources Code (PRC) § 21001 states that the environmental review process is intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives which will avoid or substantially lessen such significant effects. In addition, PRC § 21002.1 (a) states, in part, that the purpose of an environmental impact report is to identify the significant effects on the environment of a project, identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.

Section 15126.6 of CEQA provides guidance regarding the consideration and discussion of project alternatives in an EIR. More specifically, CEQA Guidelines § 15126.6(a) states the following:

> *An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation. An EIR is not required to consider alternatives which are infeasible.*

Furthermore, the CEQA Guidelines advise that project alternatives be selected primarily based on the ability to avoid or substantially lessen significant impacts relative to those of the proposed project, even if the alternatives would impede, to some extent, the attainment of the project objectives, or would even be more costly. The CEQA Guidelines further instruct that the identification of alternatives be guided by a "rule of reason," so that only those alternatives necessary to permit a reasoned choice are addressed. In selecting project alternatives for analysis, potential alternatives must be feasible. CEQA Guidelines § 15126.6(f)(1) states that:

> *Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries [...], and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site [...]*

In addition, the CEQA Guidelines § 15126.6(e) requires analysis of a "no project" alternative and § 15126.6(f)(2) requires an evaluation, if feasible, of alternative location(s) for the project. Based on the alternatives analysis, an environmentally superior alternative is then designated. If the No Project/No Build Alternative ends up as the “environmentally superior alternative”, then the EIR shall identify an environmentally superior alternative among the other alternatives.

Under CEQA, the goal of identifying the environmentally superior alternative is to assist decisionmakers in considering project approval. However, CEQA does not require an agency to select the environmentally superior alternative (CEQA Guidelines § 15042-15043). Specifically, CEQA Guidelines § 15043 states that a public agency may approve a project even though the project would

cause a significant effect on the environment if the agency makes a fully informed and publicly disclosed decision that:

(a) There is no feasible way to lessen or avoid the significant effect (see CEQA Guidelines § 15091); and

(b) Specifically identified expected benefits from the project outweigh the policy of reducing or avoiding significant environmental impacts of the project (see CEQA Guidelines §15093).

As stated in CEQA Guidelines § 15093(a):

> *CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."*

In accordance with CEQA Guidelines §15126.6, the following section discusses a reasonable range of alternatives that would "feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen potential significant impacts of the project, and evaluate the comparative merits of the alternatives."

5.2 Overview of Selected Alternatives

As discussed above, alternatives are identified to reduce the significant impacts of a proposed project. Based on the analyses provided in **Section 4.0**, Environmental Impact Analysis, of this Draft EIR, implementation of the Project would result in significant impacts that cannot be feasibly mitigated with respect to Aesthetics (**Section 4.1**) and historic cultural resources (due to demolition of the CRHR-listed existing Rose Hill Courts, as discussed in the Cultural Resources section (**Section 4.4**), and noise during the temporary construction phase of the Project due to onsite construction activities, as discussed in the Noise section (**Section 4.9**) of this Draft EIR. After implementation of mitigation measures, the Project would still have significant environment effects, which would necessitate the adoption of a Statement of Overriding Considerations for impacts regarding aesthetics, cultural (historic buildings) resources, and noise during Project construction. Furthermore, as evaluated in **Section 4.0**, Environmental Impact Analysis, of this Draft EIR, cumulative impacts to aesthetics and cultural resources would be significant and unavoidable due to impacts to historical resources.

Therefore, the alternatives to the Project, listed below, were selected for evaluation based on the significant environmental impacts of the Project, the basic objectives established for the Project as presented in **Section 2.0** (Project Description) of this Draft EIR, and the feasibility of the alternatives considered. Each of these alternatives is described in the sections that follow.

- **Alternative 1: No Project/No Action Alternative**
- **Alternative 2: Non-Historically Compliant Rehabilitation Alternative**

- **Alternative 3: Historic Rehabilitation Alternative**

In addition, CEQA Guidelines § 15126.6(c) requires that an EIR identify any alternatives that were considered for analysis but rejected as infeasible. Such potential alternatives are described below.

5.3 Alternatives Considered and Rejected as Infeasible

According to CEQA Guidelines § 15126.6(c), an EIR should identify any alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. The factors that may be used to eliminate an alternative from detailed consideration may include the alternative's failure to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. Alternatives to the Project that have been considered and rejected as infeasible include the following:

- **Alternatives to Eliminate Significant Impacts to Aesthetic and Historical Resources:** Besides the No Project/No Action Alternative included as Alternative 1, a Reduced Density/Partial Historic Preservation Alternative would remove seven of the 15 existing multi-family residential buildings on the Project Site, but would limit demolition of contributing structures to a portion of the site. The same buildings proposed for demolition in Phase I of the Project would be demolished for this alternative. Seven buildings (20 units, estimated total 17,017 square feet) including the existing administrative building (estimated 2,810 square feet) would be demolished. Specifically, the following contributing buildings would be demolished: Administration Building (1 building), Building Type B (1 building), Building Type D (4 buildings), and Building Type E (1 building). With the demolition of these buildings, there would be no remaining Building Types B, D, and E. The only contributing buildings to remain would be Building Type A (2 buildings) and Building Type C (6 buildings). The eight remaining existing buildings include 80 units totaling an estimated 62,818 square feet. The Historical Resource Technical Report (GPA Consulting, 2018) prepared for the Project Site is included in **Appendix L**. This report documents the historical resources and existing building types on the Project Site. See Table 1 (p.15) and Figure 13 (p. 18) of this report (included in **Appendix L**).

  This alternative would construct two new three-story multi-family buildings in the northeastern portion of the Project Site and would renovate the remaining contributing structures. The height of the new buildings would be reduced from that of the Project to be more compatible with the height and massing of the remaining contributors.

  The new multi-family buildings under this alternative would be located at the corner of Florizel and McKenzie and would contain 40 multi-family units as well as leasing space, community room, common laundry facilities, bike storage and other guest amenities. Surface parking would be provided in two lots to the east and west of the new buildings (in the approximate location of Buildings Type B and D). Victorine would remain as an onsite private driveway, but with fewer parking spaces along its length than what currently exists. The new buildings would reach approximately 35 feet in height. The remaining buildings onsite, which contain 80 multi-family units, would be renovated with new interior and exterior finishes. The total number of units onsite would therefore be 120, including 118 restricted affordable units and 2 unrestricted (market rate) manager's units.

  New landscaping would be provided, and would serve to tie the new and renovated portions of the site together, while maintaining the relatively open space between buildings consistent

with garden style apartments. Compared to the Project, there would be 65 fewer restricted affordable units. Under the Reduced Density/Partial Historic Preservation Alternative, the amount of excavation, and soil hauling would be similar to that of Phase 1 of the Project; however, the construction duration would be shortened due to the reduction in the amount of demolition required (due to the retention of eight existing buildings) as well as the reduced total floor area and building heights of the proposed buildings.

As with the Project, the Reduced Density/Partial Historic Preservation Alternative would require a density bonus/public benefit entitlement application. Upon completion, this alternative would result in approximately 53,593 square feet of new floor area, which in addition to the existing 62,818 square feet of renovated buildings equates to a maximum FAR of +/- 0.51.

The Reduced Density/Partial Historic Preservation Alternative was considered but rejected for further consideration in the Environmental Impact Report because this alternative would remove seven of the 15 existing multi-family residential buildings on the Project Site, including demolition of all of Building Types B and D and the administration building. Rose Hill Courts would fail to retain sufficient integrity to convey its significance. As a result, while it would somewhat lessen the impact, it would not avoid the Project's significant impact on historical resources because the property would no longer remain eligible for listing in the NRHP. Further, under this alternative only a portion of the Project Site would be provided with new buildings for residents and would result in 65 fewer affordable units would be added as compared to the Project. Although most of the impacts would be less than the Project due to a shorter and less intense construction phase, it would not retain the historical significance of Rose Hill Courts and impacts to historical resources would still be significant. The Reduced Density/Partial Historic Preservation Alternative would not achieve the basic project objectives of increasing the supply of affordable housing to the same extent the Project would, nor would it avoid the significant impact on historical resources. This alternative would not meet most of the basic Project objectives. Thus, the Reduced Density/Partial Historic Preservation Alternative was eliminated from further consideration.

- **Alternative Project Site:** The results of a search to find an alternative site within the Community Plan area on which the Project could be built determined that suitable similar locations are not available to meet the underlying purpose and objectives of the Project to locate new and additional affordable housing within walking distance to existing offsite recreational amenities and public transportation needed for low-income housing. Thus, in accordance with § 15126.6(f) of the State CEQA Guidelines, this alternative was rejected from further consideration.

5.4 Alternatives Analysis Format

Consistent with the CEQA Guidelines § 15126.6(d), each alternative was assessed at a level of detail necessary to determine if the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the proposed Project. Furthermore, each alternative was evaluated to determine whether the Project's basic objectives, identified in **Section 2.0**, Project Description, of this Draft EIR, would be significantly attained by the alternative. The evaluation of each of the alternatives follows the process described below:

1. An alternative's net environmental impacts for each environmental issue area (analyzed in **Section 4.0**, Environmental Impact Analysis, of this Draft EIR) was determined assuming that the alternative would implement the same project design features and mitigation measures identified in **Section 4.0**, Environmental Impact Analysis, of this Draft EIR.

2. The post-mitigation significant and non-significant environmental impacts of an alternative and the Project were compared for each environmental issue area as follows:

   - Less: If the net impact of an alternative would be clearly less adverse or more beneficial than the impact of the Project, the comparative impact was determined to be "less."

   - Greater: If the net impact of an alternative would clearly be more adverse or less beneficial than the Project, the comparative impact was determined to be "greater."

   - Similar: Where the impact of an alternative and Project would be roughly equivalent, the comparative impact was determined to be "similar."

3. The comparison of the impacts is followed by a general discussion of whether the underlying purpose and basic Project objectives are feasibly and substantially attained by the alternative.

Table 5.4-1 on the following page provides a summary of the description of alternatives and a comparison of the different project components. **Table 5.4-2** provides a summary comparison, by environmental topic, of the Project impacts and the impacts of each of the alternatives. **Table 5.4-3** provides a summary comparison of each of the alternatives' ability to meet the goals and objectives of the Project.

Table 5.4-1
Summary of Alternatives

	Project	Alternative 1: No Project/ No Action Alternative	Alternative 2: Non-Historically Compliant Rehabilitation Alternative	Alternative 3: Historic Rehabilitation Alternative
Brief Description	The proposed two-phase Project includes: the demolition of Rose Hill Courts' existing 15 structures and subsequent construction of 185 housing units onsite (183 of which would be affordable and two of which would be managers' units).	This alternative would involve the continuation of uses on the site; therefore, existing buildings and tenants would remain at the Project Site and no new buildings or uses would be constructed or demolished.	This alternative would redevelop the existing units at Rose Hill Courts, but not in a way that would preserve the historic integrity of the property. However, the Non-Historically Compliant Rehabilitation Alternative would retain the existing 100 units on the Project Site and would not allow for the opportunity to increase the number of affordable housing units on the Project Site.	This alternative would redevelop the existing units at Rose Hill Courts in a way that would preserve the historic integrity of the property. This alternative would rehabilitate the planning and design principles of the Garden City and Modern movements utilized in the Rose Hill Courts development. The Historic Rehabilitation Alternative would retain the existing 100 units on the Project Site and would not allow for the opportunity to increase the number of affordable housing units on the Project Site.
Existing Uses to Remain	The existing uses on the Site will remain the same.	The existing uses on the Site will remain the same.	The existing uses on the Site will remain the same.	The existing uses on the Site will remain the same.
Number of Units	Total of 185 (183 are affordable and 2 are market-rate manager's units)	91 habitable units and 9 uninhabitable units	There would be a minimal increase in the number of occupied housing units from the existing 91 habitable units to 100 habitable units because this alternative would make all 100 units on the Project Site habitable. Redevelopment would involve the temporary relocation of residents during the redevelopment of units.	There would be a minimal increase in the number of occupied housing units from the existing 91 habitable units to 100 habitable units because this alternative would make all 100 units on the Project Site habitable. Redevelopment would involve the temporary relocation of residents during the redevelopment of units.
Number of parking spaces	174	80	80	80
Estimated Population	Approximately 656 persons	Approximately 218 persons (9 units would remain unoccupied due to condition of those units rendering them unleasable).	Approximately 400 persons (2 persons per bedroom multiplied by 200 bedrooms)	Approximately 400 persons (2 persons per bedroom multiplied by 200 bedrooms)
Relocation	The residents who live in Phase I will be provided with the opportunity to move into an un-impacted unit onsite if a unit is available or to offsite accommodations while Phase I is being constructed. Once Phase I is complete, any residents that were temporarily housed offsite will be able to move into Phase I and those families who live in the occupied units of Phase II's footprint will be able to move directly from their unit into a completed unit in Phase I.	No relocation	Redevelopment would involve the temporary relocation of residents during the rehabilitation of units. When residents return to a renovated unit with Section 8 subsidy, they would need to be "right sized" to the new occupancy standards meaning not all residents would be able to return to a right sized unit.	Redevelopment would involve the temporary relocation of residents during the rehabilitation of units. When residents return to a renovated unit with Section 8 subsidy, they would need to be "right sized" to the new occupancy standards meaning not all residents would be able to return to a right sized unit.

Table 5.4-2
COMPARISON SUMMARY OF PROJECT IMPACTS AND ALTERNATIVES IMPACTS

Environmental Topic	**Proposed Project**	**Alternative 1: No Project/ No Action Alternative**	**Alternative 2: Non-Historically** Compliant Rehabilitation Alternative	**Alternative 3:** Historic Rehabilitation Alternative
Aesthetics				
Construction				
Scenic Vistas	No Impact	Similar (no impact)	Similar (no impact)	Similar (no impact)
Visual Character	SU w/Mit	Less (no impact)	Similar	Less
Shading	LTS	Less (no impact)	Less	Less
Light and Glare	LTS	Less (no impact)	Less	Less
Operation				
Scenic Vistas	No Impact	Similar (no impact)	Similar (no impact)	Similar (no impact)
Visual Character	SU w/Mit	Less (no impact)	Similar	Less (no impact)
Shading	LTS	Less (no impact)	Less	Less
Light and Glare	LTS	Less (no impact)	Less	Less
Air Quality				
Construction				
Regional Emissions	LTS	Less (no impact)	Less	Less
Localized Emissions	LTS	Less (no impact)	Less	Less
Toxic Air Contaminates	LTS	Less (no impact)	Less	Less
Operation				
Regional Emissions	LTS	Less (no impact)	Less	Less
Localized Emissions	LTS	Less (no impact)	Less	Less
Toxic Air Contaminates	LTS	Less (no impact)	Less (no impact)	Less (no impact)
Biological Resources				
Construction	**LTS w/Mit**	**Less** (no impact)	Similar	Similar
Operation	**No Impact**	Similar (no impact)	Similar (no impact)	Similar (no impact)
Cultural Resources				
Archaeological Resources	**LTS**	Less (no impact)	Less (no impact)	Less (no impact)
Historic Resources	**SU w/Mit**	Less (no impact)	Similar	Less (no impact)
Geology and Soils				
Geology and Soils	LTS w/Mit	**Less** (no impact)	Less	Less
Paleontological Resources	**LTS w/Mit**	Less (no impact)	Less (no impact)	Less (no impact)
Greenhouse Gas Emissions				
Construction	LTS	Less (no impact)	Less	Less
Operation	LTS	Less (no impact)	Less	Less
Hazards and Hazardous Materials				
Construction	**LTS w/Mit**	Less (no impact)	Similar	Similar
Operation	**LTS**	**Similar**	Less	Less
Land Use and Planning				
Land Use Compatibility	No Impact	Similar (no impact)	Similar (no impact)	Similar (no impact)
Land Use Consistency	LTS	**Less** (no impact)	**Less** (no impact)	**Less** (no impact)
Noise				
Construction				
Onsite Noise	SU w/Mit	Less (no impact)	Less	Less
Offsite Noise	SU w/Mit	Less (no impact)	Less	Less
Onsite Vibration (Building Damage)	LTS	Less (no impact)	Less	Less

Environmental Topic	Proposed Project	Alternative 1: No Project/ No Action Alternative	Alternative 2: Non-Historically Compliant Rehabilitation Alternative	Alternative 3: Historic Rehabilitation Alternative
Onsite Vibration (Human Annoyance)	LTS	Less (no impact)	Less	Less
Offsite Vibration (Building Damage)	LTS	Less (no impact)	Less	Less
Offsite Vibration (Human Annoyance)	LTS	Less (no impact)	Less	Less
Operation				
Onsite Noise	LTS	Less	Less	Less
Offsite Noise	LTS	Less	Less	Less
Population and Housing				
Construction	LTS	**Less** (no impact)	**Similar**	**Similar**
Operation	LTS	**Less** (no impact)	Greater (LTS)	**Greater (LTS)**
Public Services				
Fire Protection				
Construction	**LTS**	**Less** (no impact)	**Less**	**Less**
Operation	**LTS**	**Less** (no impact)	**Less (no impact)**	**Less (no impact)**
Police Protection				
Construction	**LTS w/Mit**	**Less** (no impact)	**Less**	**Less**
Operation	**LTS**	**Less** (no impact)	**Less (no impact)**	**Less (no impact)**
Schools				
Construction	**LTS**	**Less** (no impact)	**Less (no impact)**	**Less (no impact)**
Operation	**LTS**	**Less** (no impact)	**Less (no impact)**	**Less (no impact)**
Recreation and Parks				
Construction	**LTS w/Mit**	**Less** (no impact)	**Similar**	**Similar**
Operation	**LTS**	**Less** (no impact)	Less	**Less**
Libraries				
Construction	**LTS**	**Less** (no impact)	**Less (no impact)**	**Less (no impact)**
Operation	**LTS**	**Less** (no impact)	**Less**	**Less**
Transportation/Traffic				
Construction	**LTS w/Mit**	**Less** (no impact)	Less	Less
Operation				
Intersection Levels of Service	**LTS**	**Less** (no impact)	Less	Less
Regional Transportation System	**LTS**	**Less** (no impact)	Less	Less
Access and Circulation	**No Impact**	Similar (no impact)	Similar (no impact)	Similar (no impact)
Bicycle, Pedestrian, and Vehicular Safety	**No Impact**	Similar (no impact)	Similar (no impact)	Similar (no impact)
Parking	**No Impact**	Similar (no impact)	Similar (no impact)	Similar (no impact)
Tribal Cultural Resources				
Construction	**LTS**	**Less** (no impact)	**Less**	**Less**
Operation	**LTS**	**Less** (no impact)	**Less** (no impact)	**Less** (no impact)
Wildfire				
Construction	LTS	**Less** (no impact)	Less	**Less**
Operation	LTS	**Greater**	Less	**Less**
Energy				
Energy Use				

Environmental Topic	Proposed Project	Alternative 1: No Project/ No Action Alternative	Alternative 2: Non-Historically Compliant Rehabilitation Alternative	Alternative 3: Historic Rehabilitation Alternative
Construction	LTS	Less (no impact)	Less	Less
Operation[a]	LTS	Less (no impact)	Less	**Less**
Infrastructure Capacity				
Construction	LTS	Less (no impact)	Less	**Less**
Operation	LTS	Less (no impact)	Less	Less

Source: UltraSystems, 2019.
Table Notes:
Similar= the alternative would have similar impacts as the Project
Less= the alternative would have a lesser impact than the Project
Greater= the alternative would have more of an impact than the Project
SU= Significant and Unavoidable Impact
LTS= Less than significant
LTS w/ Mit= Less than significant with mitigation
[a]As discussed in Section 4.15 of this DEIR, compared to existing conditions, overall Project energy use will increase but Project per capita energy use will decrease due to energy-efficient Project Design Features.

Table 5.4-3
COMPARISON OF ALTERNATIVES AND THEIR ABILITY TO MEET PROJECT OBJECTIVES

Project Objective	Proposed Project	No Project/No Action Alternative	Non-Historically Compliant Rehabilitation Alternative	Historical Rehabilitation Alternative
1. To provide a substantial increase in the number of affordable housing units than exist today at the Project Site, consistent with the goals of HACLA's 25-Year Vision Plan, *Build* HOPE, to expand affordable housing opportunities and increase the permanent affordable housing supply in Los Angeles.	Objective Fully Met	Objective Not Met	Objective Not Met	Objective Not Met
2. To maximize the opportunity for existing tenants to return once the Project is completed by matching their household size to a "right size" unit.	Objective Fully Met	Objective Not Met	Objective Not Met	Objective Not Met
3. To assist the City of Los Angeles in meeting its affordable housing needs and goals.	Objective Fully Met	Objective Not Met	Objective Not Met	Objective Not Met
4. To design the Project in a manner that maximizes accessibility, energy efficiency and contemporary amenities.	Objective Fully Met	Objective Not Met	Objective Partially Met	Objective Partially Met
5. To provide a site that enhances security and provides for safe and useable open/green space.	Objective Fully Met	Objective Not Met	Objective Fully Met	Objective Partially Met
6. To increase and locate onsite parking in closer proximity to the housing units.	Objective Fully Met	Objective Not Met	Objective Not Met	Objective Not Met
7. To provide a long-term useful life of buildings to minimize the future need for investment in affordable housing rehabilitation and repairs.	Objective Fully Met	Objective Not Met	Objective Partially Met	Objective Partially Met
8. To maximize housing in close proximity to transit and parks.	Objective Fully Met	Objective Not Met	Objective Not Met	Objective Not Met

Source: UltraSystems, 2019.

5.5 Analysis of Alternative 1 – No Project/No Action Alternative

5.5.1 Description of the Alternative

In accordance with the CEQA Guidelines, the No Project Alternative for a development project on an identifiable property consists of the circumstances under which the project does not proceed. Section 15126.6(e)(3)(B) of the CEQA Guidelines states in part that, "in certain circumstances, the No Project Alternative mean 'no build' wherein the existing environmental; setting is maintained." Accordingly, for the purposes of this analysis, Alternative 1, the No Project Alternative, assumes that the project would not be approved, no new permanent development would occur within the Project Site, and the existing environment would be maintained. This alternative would involve the continuation of uses on the site; therefore, existing buildings and tenants would remain at the Project Site. No demolition of the existing 15 buildings would occur and no new buildings would be constructed. With this alternative, the existing 100 affordable housing units and existing parking would remain the same on the Project Site. While HACLA would continue to perform routine maintenance, the existing buildings will continue to require significant capital investment due to their age, however; major upgrades to utilities, amenities, and energy efficiency would not occur. The long-term needs of the site would not be addressed and additional affordable housing units would not be constructed on site. No temporary relocation of the existing residents would be required for this alternative.

Under this Alternative, the site would continue to be used for public housing and the HUD public housing occupancy standards would not change. The site would not be used for the HUD Section 8 subsidy program and current residents would not have the opportunity to move to a different sized unit since none would be available.

5.5.2 Environmental Impacts

5.5.2.1 Aesthetics

Scenic Vistas

Under Alternative 1, the existing buildings would remain on the Project Site and the Project would not be developed. As such, Alternative 1 would not result in an increase in height or massing of onsite structures, and existing views of, and across, the Project Site would remain the same. Therefore, Alternative 1 would not have the potential to obstruct a scenic vista, and no impacts to scenic vistas would occur. Thus, impacts related to scenic vistas would be similar when compared to the Project, which would have no impacts to scenic vistas.

Visual Character

<u>Construction</u>

Under the No Project Alternative, no construction activities would occur and as such, no changes in the visual character of the Project Site would result. Therefore, there would be no potential for the construction activities to affect the visual character of the area on a short-term or long-term basis under Alternative 1. As such, the No Project Alternative would avoid the Project's significant and unavoidable impact during construction and operation. This alternative would leave the site in its current conditions. While HACLA would continue to perform routine maintenance, the existing buildings will continue to require significant capital investment due to their age, and major upgrades to utilities, amenities and energy efficiency would not occur. The rows of two-story structures onsite

would remain. This alternative would not improve the aesthetic conditions onsite because buildings would remain in their current state. This alternative would have no impact. Thus, impacts to visual character during construction would be less when compared to the significant and unavoidable impacts of the Project after mitigation.

Operation

The No Project Alternative would not replace the existing architecture and building materials currently on the Project Site. Therefore, this alternative would have no impact to the existing visual character or quality of the site and its surroundings and impacts to visual character during operation would be less when compared to the significant and unavoidable impacts of the Project after mitigation.

Shading

The No Project Alternative would not create or cast new shadows on surrounding sensitive uses since new buildings would not be constructed on the Project Site. Existing shadows from the existing multi-family residential buildings and street trees currently do not generate shadows on surrounding sensitive uses. Therefore, no shading impacts would occur under Alternative 1. Thus, shading impacts under Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

Light and Glare

Construction

The No Project Alternative would not involve any demolition or construction activities. Therefore, Alternative 1 would not introduce light sources associated with construction equipment or construction-related equipment and the materials with the potential to cause glare. Artificial lighting is currently utilized onsite and in the surrounding area for security, parking, signage, architectural highlighting, and landscaping/decorative purposes. Street lights and traffic on local streets also contribute to the ambient light levels in the area. No additional units with additional windows and lighting would be constructed under this alternative, therefore no impacts to lighting and glare would occur under the No Project Alternative. Thus, light and glare impacts during construction would be less when compared to the less-than-significant impacts of the Project.

Operation

The No Project Alternative would not alter the existing uses on the Project Site, introduce any new sources of light or glare on the Project Site, or otherwise increase the amount of activity occurring onsite. Therefore, the No Project Alternative would not change the existing lighting environment on the Project Site. No operation-related light and glare impacts would occur under Alternative 1. Thus, impacts related to operational light and glare under Alternative 1 would be less in comparison to the less-than-significant impacts of the Project.

5.5.2.2 Air Quality

Construction

Regional Emissions

The No Project Alternative would not alter the existing multi-family residential buildings or require any construction activities on the Project Site. Therefore, this alternative would not result in any construction emissions associated with construction worker and construction truck traffic, fugitive dust from demolition and excavation, or the use of heavy-duty construction equipment, and construction-related regional air quality impacts would not occur. As such, the No Project Alternative would eliminate the less-than-significant impacts of the Project associated with regional emissions. Therefore, no construction-related air quality impacts would occur under Alternative 1, and impacts would be less than the less-than-significant impacts of the Project.

Localized Emissions

As discussed previously, the No Project Alternative would not result in any construction emissions associated with construction worker and construction truck traffic, fugitive dust from demolition and excavation, or the use of heavy-duty construction equipment, and construction-related localized air quality impacts would not occur. As such, the No Project Alternative would eliminate the less-than-significant impacts of the Project associated with localized emissions. Therefore, no construction-related air quality impacts would occur under Alternative 1, and impacts would be less than the less-than-significant impacts of the Project.

Toxic Air Contaminants

Since construction activities would not occur on the Project Site, the No Project Alternative would not result in diesel particulate emissions during construction that could generate substantial toxic air contaminants (TACs). Therefore, no impacts associated with the release of TACs would occur under Alternative 1. As such, TAC impacts under Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

Operation

Regional Emissions

The No Project Alternative would not result in new development or increased operations that could generate additional operational emissions related to vehicular traffic or the consumption of electricity and natural gas beyond what is currently generated by the existing multi-family residential buildings on the Project Site. Therefore, no operational air quality impacts associated with regional emissions would occur under Alternative 1. The No Project Alternative would avoid the less-than-significant impacts of the Project associated with regional emissions that would occur at Project buildout. Thus, such impacts under Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

Localized Emissions

As discussed previously, the No Project Alternative would not result in new development or increased operations that could generate additional operational emissions related to vehicular traffic or the consumption of electricity and natural gas beyond what is currently generated by the existing multi-family residential buildings on the Project Site. Therefore, no operational air quality impacts associated with localized emissions would occur under Alternative 1. The No Project Alternative would avoid the less-than-significant impacts of the Project associated with localized emissions that

would occur at Project buildout. Thus, such impacts under Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

Toxic Air Contaminants

As analyzed in Section 4.2, Air Quality, of this Draft EIR, the Project would result in some TAC emissions, primarily from mobile sources. Since Alternative 1 would not result in new development or increase the intensity of the existing uses on the Project Site, no new increase in mobile source emissions would occur. No operational impacts associated with TACs would occur under Alternative 1, and such impacts would be less when compared to the less-than-significant impacts of the Project.

5.5.2.3 Biological Resources

The No Project/No Action Alternative would not remove any vegetation, including existing shrubs and trees, or existing buildings on the Project Site. No new buildings would be constructed or demolished that may impact plant and/or wildlife species. The No Project Alternative would not result in indirect impacts on nesting birds from increased noise, vibration, and dust during construction and it would not impact migratory non-game breeding birds. Therefore, this alternative would have no impact on biological resources and impacts would be less when compared to the Project, which would be less-than-significant after mitigation.

5.5.2.4 Cultural Resources

Archaeological Resources

Under the No Project Alternative, demolition, grading, or other earthwork activities that could potentially affect subsurface archaeological resources would not occur under the No Project/No Build Alternative. Therefore, impacts to archaeological resources would not occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

Historical Resources

Since this alternative would include no demolition or new construction and the Rose Hill Courts would have no change in operations, there would be no impact on historical resources. Under Alternative 1, demolition, grading, or other earthwork activities that could potentially affect onsite historical resources would not occur under the No Project/No Build Alternative. Therefore, impacts to historical resources would not occur under Alternative 1, and impacts would be less when compared to the Project, which would be significant and unavoidable after mitigation.

5.5.2.5 Geology and Soils

Geology and Soils

The No Project/No Action Alternative would not result in soil disturbance or grading on the existing Project Site, and would not result in any degree of soil loss greater than existing conditions. The potential for seismically-induced ground settlement, liquefaction, lateral spreading, expansive soils, and landslides would remain as they are described in this section and in the Geotechnical Investigation (**Appendix J**) because those are the baseline conditions of the Rose Hill Courts Project Site. Therefore, the No Project/No Action Alternative would not cause or accelerate geologic hazards

related to fault rupture, strong seismic shaking, liquefaction, seismically induced settlement, soil stability, subsidence, or expansive soils, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. This alternative would have no impact because no demolition of the existing buildings would occur and no new housing would be constructed under this alternative. No impacts related to geology and soils would occur under Alternative 1, and thus impacts would be less when compared to the less-than-significant impacts of the Project after Mitigation.

Paleontological Resources

The No Project/No Action Alternative would not require demolition or construction, it would not require soil disturbance or grading and excavation on the existing Project Site, and therefore it would not result in potential impacts to paleontological resources due to construction. Alternative 1 would have less impacts to paleontological resources than the Project, which would be less than significant after mitigation**.**

5.5.2.6 Greenhouse Gas Emissions

Since the No Project/No Action Alternative would include no demolition or new construction and Rose Hill Courts would have no change in operations, this alternative would have no impact. The No Project Alternative would not develop new uses on the Project Site. Therefore, no new greenhouse gas (GHG) emissions would be generated under Alternative 1 and new impacts beyond existing conditions associated with global climate change would not occur. The No Project Alternative would avoid the less-than-significant GHG impacts of the Project. Therefore, impacts associated with GHG emissions under the No Project/No Action Alternative would be less when compared to the less-than-significant impacts of the Project.

5.5.2.7 Hazards and Hazardous Materials

This alternative would involve the continuation of uses on the site; therefore, existing buildings and number of tenants would remain at the Project Site. The No Project Alternative would not require demolition, grading, or other construction activities. Therefore, this alternative would not have the potential to uncover subsurface hazards, use or release hazardous materials, or generate hazardous waste, or the use and storage of hazardous materials during construction. In addition, the No Project/No Action Alternative would not result in new development or increased operations that would use or potentially generate hazardous materials. Since Alternative 1 would not result in any changes to the current operation, configuration, or number of residents at the Project Site, no impacts would occur to the current emergency response or evacuation plans for the site. Even though the existing Project Site buildings would not be demolished, there still remains the potential for ACMs and LBP to be disturbed. The soils around the buildings would still contain lead, although below regulatory limits, as discussed in Section 4.7, Hazards and Hazardous Materials, of this Draft EIR. The Project Site is in an area with moderate potential for radon, however in the absence of radon testing it is unknown whether radon is present at levels requiring mitigation. Therefore, the No Project Alternative would be similar to the less-than-significant impacts of the Project.

5.5.2.8 Land Use and Planning

Land Use Compatibility

Since the No Project Alternative would not develop new land uses on the Project Site, the existing onsite and/or offsite land uses would not be altered, and existing land use relationships would remain. As such, no impacts related to land use compatibility would occur under Alternative 1. Under the Project, even after development, the land use would remain the same and no impact to land use compatibility would occur. Therefore, impacts regarding land use compatibility under Alternative 1 would be similar when compared to the Project, which would also have no impacts to land use compatibility.

Land Use Consistency

The No Project/No Action Alternative would involve no development on the Project Site. However, with this alternative there would be no additional affordable housing units constructed on site and the existing units at Rose Hill Courts would continue to age. This alternative would have no land use or planning impacts. Under the No Project Alternative, there would be no changes to the physical or operational characteristics of the existing multi-family residential buildings. No land use approvals or permits would be required. Therefore, Alternative 1 would not result in any inconsistencies with existing land use plans and policies that govern the Project Site. No impacts associated with consistency with land use regulations and plans would occur, and impacts would be less than the less-than-significant impacts of the Project. However, it should be noted that, unlike the Project, Alternative 1 would not advance local and regional planning objectives that promote the development of new housing to meet affordable housing demand. There would be no new development onsite that would provide much-needed affordable housing.

5.5.2.9 Noise

Construction

No new construction activities would occur under the No Project/No Action Alternative. Therefore, no construction-related noise or vibration would be generated onsite or offsite. As such, no onsite or offsite noise or vibration impacts would occur during construction under Alternative 1, and impacts would be less when compared to the short-term impacts of the Project, which would be significant and unavoidable for onsite and offsite construction noise after mitigation, and less than significant for onsite and offsite construction vibration.

Operation

The No Project/No Action Alternative would not develop new uses on the Project Site, and no changes to existing site operations would occur. Therefore, no new stationary or mobile noise sources would be introduced to the Project Site or the Project vicinity. As such, no impacts associated with operational noise would occur under Alternative 1, and long-term impacts would be less when compared to the less-than-significant impacts of the Project.

5.5.2.10 Population and Housing

Under the No Project/No Action Alternative, no buildings would be demolished and no construction activities would occur. Therefore, the temporary short-term displacement and relocation of the

existing tenants would not be required. Therefore, there would be no impacts associated with the displacement of people under this alternative, which would be less when compared to the less-than-significant impacts of the Project.

The No Project/No Action Alternative would not increase the population on the existing Project Site and would not add additional affordable housing units to the Project Site. This alternative would not result in a growth-inducing impact and would not cause housing growth. Therefore, there would be no impacts regarding population growth, which would be less than the less-than-significant impacts of the Project.

The units that currently exist at Rose Hill Courts were built in the 1940s and are in poor condition due to their age. Unlike the Project, Alternative 1 would not advance local and regional planning objectives that promote the development of new housing to meet affordable housing demand and estimated population projections. This alternative would not help the City of Los Angeles meet its affordable housing needs. This alternative would have no impact because no housing or people would be temporarily displaced with this alternative. Therefore, impacts regarding displacement of housing or people would be less than the less-than-significant impacts under the Project.

5.5.2.11 Public Services

Fire Protection

<u>Construction</u>

Under the No Project Alternative, no demolition and construction activities would occur and Alternative 1 would not have the potential for construction activities to expose people to the risk of fire or explosion related to the use of hazardous materials or to potentially impact the provision of fire protection services in the vicinity of the Project Site. Thus, no construction-related fire protection impacts would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

<u>Operation</u>

There would be no potential to increase the level of activity on the Project Site or increase the service population for the LAFD stations that would serve the Project Site. No long-term impacts to fire protection and emergency services would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

Police Protection

<u>Construction</u>

Under the No Project Alternative, no demolition and construction activities would occur thus Alternative 1 would not have the potential for construction to create sources of nuisances and hazards or potentially impact police protection services in the vicinity of the Project Site. Therefore, Alternative 1 would not result in any police protection impacts due to construction, and impacts would be less when compared to the Project, which would be less than significant after mitigation.

Operation

There would be no potential to increase the level of activity on the Project Site or increase the service population for the LAPD station that would serve the Project Site. No long-term impacts to police protection services would occur under Alternative 1, and impacts would be less when compared to the Project, which would be less than significant after mitigation.

Schools

Construction

Under the No Project Alternative, no demolition and construction activities would occur thus this alternative would not have the potential for construction employment to result in an increase in the resident population or corresponding demand for schools in the vicinity of the Project Site. Therefore, Alternative 1 would not result in any school impacts due to construction, and impacts would be less when compared to the less-than-significant impacts of the Project.

Operation

Since the No Project Alternative would not have an increase in population, there would be no potential to increase the population of school-aged children in the attendance boundaries of the schools within the LAUSD that serve the Project Site. Accordingly, no long-term impacts to school services would occur under Alternative 1, and impacts would be less than the Project's less-than-significant impact on school services.

Recreation and Parks

Construction

Under the No Project Alternative, no demolition and construction activities would occur at the site. Therefore, potential short-term construction impacts to users of parks and recreation facilities in the area associated with air quality, noise, and traffic would not occur. This alternative also would not create access issues or require a traffic plan for parks and recreation facilities in the area. No impacts to parks and recreational facilities would occur under the No Project Alternative, and short-term impacts would be less than the Project 's less-than-significant impact on parks and recreational facilities after mitigation.

Operation

Since the No Project Alternative would not increase population at the site it would not generate additional long-term demand for parks and recreational facilities in the Project vicinity. No long-term impacts to parks and recreational facilities would occur under the No Project Alternative and therefore, impacts would be less than the Project 's less-than-significant impacts on parks and recreational facilities.

Libraries

Construction

Under the No Project Alternative, no demolition and construction activities would occur at the site. Alternative 1 would not have the potential for construction employment to result in an increase in the resident population or corresponding demand for libraries in the vicinity of the Project Site. Therefore, Alternative 1 would not result in any library impacts due to construction, and impacts would be less when compared to the less-than-significant impacts of the Project.

Operation

The No Project Alternative would not construct new development or increase operations onsite. Therefore, Alternative 1 would not increase the library service population. However, additional tax revenues from new development at the site (a portion of which goes to fund City library facilities and services) would not be generated. No impacts to library services would occur under the No Project Alternative, and impacts would be less than the Project 's less-than-significant impact on library services.

5.5.2.12 Transportation

Construction

Since the No Project Alternative would not include the demolition, alteration, or expansion, or the development of any new buildings onsite, construction activities would not occur on the Project Site. Therefore, Alternative 1 would not generate vehicle trips associated with heavy-duty construction equipment, haul trucks, or construction worker vehicles. As such, no construction-related traffic impacts would occur under the No Project Alternative, and the Project 's less-than-significant Project -level construction traffic impacts would be eliminated. In addition, since construction activities would not occur under Alternative 1, there would be no potential for access and safety, bus/transit, and on-street parking impacts during construction. Therefore, the No Project/No Build Alternative would also avoid the Project 's less-than-significant construction-related impacts to access and safety, bus/transit, and on-street parking. Overall, no short-term construction-related traffic impacts would occur under Alternative 1, and such impacts would be less when compared to those of the Project, which would be less than significant after mitigation.

Operation

Since the No Project Alternative would not develop new or additional land uses on the Project Site, Alternative 1 would not generate any additional vehicle trips or alter existing access or circulation within the Project Site during operation. Therefore, no impacts would occur with respect to operational traffic, including intersection levels of service; the regional transportation system; neighborhood intrusion; access and circulation; and bicycle, pedestrian, and vehicular safety. Therefore, Alternative 1 would eliminate the Project 's less-than-significant operational traffic impacts. Impacts under the No Project Alternative would be less when compared to the less-than-significant impacts of the Project.

5.5.2.13 Tribal Cultural Resources

Grading and other earthwork activities would not occur under the No Project/No Build Alternative. Therefore, there would be no potential for Alternative 1 to uncover subsurface tribal cultural resources. As such, no impacts to tribal cultural resources would occur, and impacts would be less when compared to the Project, which would be less than significant.

5.5.2.14 Wildfire

Construction

Under the No Project Alternative, no demolition or construction activities would occur at the site. Therefore, Alternative 1 would not have the potential to impair an adopted emergency response plan or emergency evacuation plan due to construction traffic. Therefore, this alternative would have no impact to emergency response plans or routes and is similar to the Project, which also would have no impact to emergency response plans or routes.

Under the No Project Alternative, no demolition or construction activities would occur at the site. Therefore, Alternative 1 would not have the potential to create fire hazards, use or release potentially flammable materials, or generate flammable waste, or the use and storage of hazardous and flammable materials during construction that could potentially become a fire hazard. There would be no construction equipment or vehicles that could create flammable gas or heavy-duty equipment that could potentially ignite a fire. Therefore, the No Project Alternative would have less short-term construction wildfire impacts when compared to the less-than-significant impacts of the Project.

Operation

This alternative would involve the continuation of uses on the site; therefore, Alternative 1 would not have the potential to impair an adopted emergency response plan or emergency evacuation plan during operation. Therefore, this alternative would have no impact to emergency response plans or routes and is similar to the Project, which also would have no impact to emergency response plans or routes during operation.

This alternative would involve the continuation of uses on the site; therefore, existing buildings would remain at the Project Site and no new buildings or uses would be constructed. The existing buildings at Rose Hill Courts were built in the 1940s and were constructed with typical building materials commonly used at that time. All of the buildings consist of wood-frame construction, concrete slab foundations, and composition roofing. The existing buildings are all in varying degrees of poor condition due to their age.

The No Project/No Action Alternative is anticipated to have a greater impact than the Project because the Project would construct new buildings with new materials and features that would be up to code and provide the highest level of fire protection. The existing buildings do not have fire sprinklers. The Project would include required fire suppression design features (i.e., fire-resistant building materials, where appropriate, smoke detection and fire alarm systems, automatic sprinkler systems (in compliance with all applicable City and Fire codes), portable fire extinguishers, and emergency signage in all buildings, and required brush clearance), identified in the latest edition of the California Building Code. Therefore, the No Project Alternative would have a greater risk of loss, injury or death involving wildland fires due to the aging buildings, utilities, and infrastructure. Therefore, this

alternative would have greater operational impacts than the less-than-significant Project impacts regarding wildfire.

5.5.2.15 Energy

Energy Use

Construction

Construction activities would not occur under the No Project Alternative. Therefore, Alternative 1 would not generate a short-term demand for energy during construction, and construction-related impacts to energy would not occur. The No Project Alternative would not require a commitment of resources for construction such as building materials, fuel, and the transportation of goods and people to and from the Project. As such, short-term impacts from construction under the No Project Alternative would be less when compared to the less-than-significant impacts of the Project.

Operation

The No Project Alternative would not alter the existing land uses or operations on the Project Site. Under the No Project Alternative, there would not be an increase in housing units and there would not be an increase in Project Site residents. Therefore, Alternative 1 would not increase the long-term energy demand on the Project Site. However, while there would be no increased demand of energy, there also would not be the opportunity to improve the energy efficiency in existing buildings. The existing buildings have old electric fixtures and wiring and are not energy efficient. Even with additional residents of the Project, the energy efficiency of the new buildings and design features under the Project would result in an energy usage less than the existing buildings. The new buildings and landscape features of the Project would actually reduce the per capita energy requirements/consumption when compared to the No Action Alternative. However, since no additional units would be constructed under Alternative 1, the population would not increase at the site and overall operational energy use would be less than the Project. As such, long-term operational impacts under the No Project Alternative would be less when compared to the less-than-significant impacts of the Project.

Infrastructure Capacity

Construction

Construction activities would not occur under the No Project Alternative. Therefore, Alternative 1 would not generate a short-term demand for energy during construction that would reduce existing energy infrastructure capacity, and construction-related impacts to energy would not occur. As such, impacts under Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

Operation

The No Project Alternative would not alter the existing land uses or operations on the Project Site. Therefore, Alternative 1 would not increase the long-term energy demand on the Project Site. No operational impacts related to energy infrastructure would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

5.5.3 Comparison of Impacts

The No Project/No Action Alternative would eliminate the Project's significant and unavoidable impacts to aesthetics and cultural resources (due to impacts to historical resources), and from construction noise. The No Project/No Action Alternative would have similar impacts as the Project during operation for biological resources and transportation regarding access and circulation; bicycle, pedestrian, and vehicular safety; and parking. Impacts from this alternative would be more than the Project during operation with regards to hazards and hazardous materials, wildfire, and energy. Impacts associated with the remaining environmental issues would be less than those of the Project.

5.5.4 Relationship of the Alternative to Project Objectives

Under the No Project/No Action Alternative, no new development would occur. Therefore, this alternative would not meet any of the Project's objectives. Specifically, this alternative would not:

- Provide a substantial increase in the number of affordable housing units than exist today at the Project Site, consistent with the goals of HACLA's 25-Year Vision Plan, *Build* HOPE, to expand affordable housing opportunities and increase the permanent affordable housing supply in Los Angeles.
- Maximize the opportunity for existing tenants to return once the Project is completed by matching their household size to a "right size" unit.
- Assist the City of Los Angeles in meeting its affordable housing needs and goals.
- Design the Project in a manner that maximizes accessibility, energy efficiency and contemporary amenities.
- Provide a site that enhances security and provides for safe and useable open/green space.
- Increase and locate onsite parking in closer proximity to the housing units.
- Provide a long-term useful life of buildings to minimize the future need for investment in affordable housing rehabilitation and repairs.
- Maximize housing in close proximity to transit and parks.

Overall, the No Project/No Action Alternative would not meet the Project's objectives of providing additional safe affordable housing units close to public transit and parks while maximizing accessibility and energy efficiency.

5.6 Analysis of Alternative 2 - Non-Historically Compliant Rehabilitation Alternative

5.6.1 Description of the Alternative

This alternative would redevelop the existing buildings at Rose Hill Courts to modernize and upgrade the units and the site and make aesthetic and energy efficiency improvements. Alternative 2 would consist of maintaining the existing 100 units, and providing renovations to restore and modernize

the buildings including: (1) comprehensive rehabilitation of the interior and exterior of the units; (2) lead and asbestos remediation; (3) structural and seismic repairs; and (4) replacement of major building systems. Proposed improvements would include the following:

- Interior improvements including removal of all interior finishes and new drywall, paint, flooring and interior light fixtures, at all living areas, kitchens and bathrooms; addition of bathrooms, and installation of new electrical, plumbing, mechanical systems and appliances.

- Health and Safety Improvements including removal of dry rot, termite damage and mold; lead and asbestos remediation; structural/seismic repairs.

- Exterior Improvements including new roofing; new windows; stucco replacements; new landscaping. Outdoor areas would be modified to eliminate the outdoor laundry hanging areas and replace with outdoor seating, walkways, courtyards, play areas and other modern amenities.

- Community Building Renovation including expansion of the existing building in order to accommodate a community room, kitchen, computer room and other uses.

This alternative would renovate the exterior of the buildings in a manner that would not meet the requirements in *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings* (Grimmer et. al, 2017) (Secretary of the Interior's Standards), as discussed in CEQA § 15064.5(b)(3) and Section 4.4, Cultural Resources. Under Alternative 2, all the buildings would be brought up to City code requirements regarding fire, health, and safety. Alternative 2 would include replacing windows with modern vinyl windows (that would be sliders and would not have the appearance of the existing steel true divided light casements), redesigning building entries with porches and canopies, adding architectural features (trellises, canopies, projections, roof line alterations, additional siding materials) inconsistent with 1940s era garden apartments. The Non-Historically Compliant Rehabilitation Alternative would retain the existing 100 units on the Project Site and would not allow for the opportunity to increase the number of affordable housing units on the Project Site. There would be a minimal increase in the number of occupied housing units from the existing 91 habitable units to 100 habitable units because this alternative would make all 100 units on the Project Site habitable. Residents would be temporarily relocated during the renovation of units.

Under this Alternative, the low-income use of the site would change from the current HUD public housing program to a HUD Section 8 Project Based Voucher ("PBV") program. Redevelopment would involve the temporary relocation of residents during the rehabilitation of units. When residents return to a renovated unit with Section 8 PBV subsidy, they would need to be "right sized" to the new occupancy standards and thus not all residents would be able to return to the same sized unit they currently reside in. Since only nine additional units would be added (for a total of 100) due to renovations, not all current residents may be able to return to Rose Hill Courts due to the change in occupancy standards.

5.6.2 Environmental Impacts

5.6.2.1 Aesthetics

Scenic Vistas

Under Alternative 2, the existing buildings would remain on the Project Site and the Project would not be developed and new buildings would not be constructed. As such, Alternative 2 would not result in an increase in height or massing of onsite structures, and existing views of and across the Project Site would remain the same. As discussed in the Initial Study prepared for the Project, included as **Appendix B** of this Draft EIR, there are no scenic views or vistas afforded on or through the Project Site. Therefore, Alternative 2 would not have the potential to obstruct a scenic vista, and no impacts to scenic vistas would occur. Thus, impacts related to scenic vistas would be similar when compared to the Project, which would have no impact to scenic vistas.

Visual Character

Construction

Under the Non-Historically Compliant Rehabilitation Alternative, there would be potential for short-term impacts to aesthetic and visual resources during construction. Alternative 2 would involve demolition of only some interior and exterior components of the buildings, and not the buildings themselves. The construction activities under this alternative would be limited to rehabilitation and improvement of the existing 100 residential units on the Project Site but the historic integrity of the buildings would not be preserved. This alternative would lead to minimal temporary changes in views associated with construction staging areas, and stockpiling of construction materials and equipment. However, any disturbance to the character of the historic buildings during construction would have a similar significant and unavoidable impact associated with existing visual quality of the site and its surroundings. Alternative 2 would comply with the same mitigation measures as the Project to reduce impacts associated with historic resources but impacts to aesthetics (due to loss of historical resources) would still be significant after mitigation. Therefore, impacts related to visual character during construction would be similar when compared to the Project, which would be significant and unavoidable after mitigation.

Operation

The Non-Historically Compliant Rehabilitation Alternative would lead to changes in the existing building materials currently used on the Project Site. This alternative would improve the aesthetic conditions on the Project Site but would not retain the historic integrity. Alternative 2 would implement the same mitigation measures as the Project to reduce impacts associated with historical resources, however, Alternative 2 would still have significant and unavoidable aesthetic impacts on existing visual character of the site and its surroundings due to the impact to the historic property as a whole. Therefore, impacts would be similar to the aesthetic impacts of the Project, which would be significant and unavoidable after mitigation.

Shading

Alternative 2 would not create or cast new shadows on surrounding sensitive uses since new buildings would not be constructed on the Project Site. Improvements in existing buildings under this alternative might change the shadows cast, however the change in shadows is not expected to be

significantly different when compared to existing conditions. Existing shadows from the existing multi-family residential buildings and street trees currently do not generate shadows on surrounding sensitive uses. Therefore, less-than-significant impacts related to shade and shadow would occur under Alternative 2. Thus, shading impacts under Alternative 2 would be less in comparison to the less-than-significant shade and shadow related impacts of the Project.

Light and Glare

Construction

Alternative 2 would involve demolition of only some interior and exterior components of the buildings, and not the buildings themselves. Due to renovation, Alternative 2 would introduce light sources associated with construction equipment or construction-related equipment and the materials with the potential to cause glare. Renovation would require the use of smaller and less powerful construction equipment and for a shorter duration, thus resulting in less opportunity for light and glare to be introduced than would the Project. Therefore, less-than-significant light and glare impacts would occur under Alternative 2 from construction. Overall, impacts related to construction light and glare under Alternative 2 would be less in comparison to the less-than-significant light and glare related impacts of the Project.

Operation

Artificial lighting is currently utilized onsite and in the surrounding area for security, parking, signage, architectural highlighting, and landscaping/decorative purposes. Street lights and traffic on local streets also contribute to the ambient light levels in the area. Alternative 2 would improve existing buildings and existing sources of lighting on the Project Site. No additional units with additional windows and lighting would be constructed under this alternative, therefore less than significant impacts to lighting and glare would occur due to the Non-Historically Compliant Rehabilitation Alternative. Alternative 2 would not alter the existing uses on the Project Site, introduce significant new sources of light or glare on the Project Site, or otherwise increase the amount of activity occurring onsite. Therefore, this Alternative would not significantly change the existing lighting environment on the Project Site. Less than significant operation-related light and glare impacts would occur under Alternative 2. Overall, impacts related to operational light and glare under Alternative 2 would be less in comparison to the less-than-significant light and glare related impacts of the Project.

5.6.2.2 Air Quality

Construction

Regional Emissions

The Non-Historically Compliant Rehabilitation Alternative would renovate the existing buildings, and would involve demolition of only some interior and exterior components of the buildings, and not the buildings themselves Therefore, similar to the Project, Alternative 2 would create construction emissions (due to renovations) associated with construction worker and construction truck traffic, fugitive dust from construction activities, or the use of construction equipment, and construction-related regional air quality impacts. However, the construction related impacts under this alternative would be less when compared to the less-than-significant construction air quality impacts associated with the Project. If the renovation process exposes asbestos, the requirements of

South Coast Air Quality Management District (SCAQMD) Rule 1403 would prevent public exposure, and impacts would be less than significant.

Localized Emissions

As discussed previously, the Non-Historically Compliant Rehabilitation Alternative would renovate the existing buildings, and would involve demolition of only some interior and exterior components of the buildings, and not the buildings themselves. Therefore, similar to the Project. Alternative 2 would lead to construction emissions (due to renovations) associated with construction worker and construction truck traffic, fugitive dust from construction activities, or the use of construction equipment, and construction-related localized air quality impacts. However, the localized construction related impacts under this alternative would be less when compared to the less-than-significant localized construction air quality impacts associated with the Project. If the renovation process exposes asbestos, the requirements of South Coast Air Quality Management District (SCAQMD) Rule 1403 would prevent public exposure, and impacts would be less than significant.

Toxic Air Contaminants

Construction activities would still occur on the Project Site for renovation of the existing buildings, thus the Non-Historically Compliant Rehabilitation Alternative would result in diesel particulate emissions during construction that could generate substantial toxic air contaminants (TACs). However, construction activities and duration for renovation would have less impacts associated with the release of TACs. As such, TAC impacts under Alternative 2 would be less when compared to the less-than-significant impacts of the Project.

Operation

Regional Emissions

Alternative 2 would not result in construction of new buildings or increased operations that could generate additional operational emissions related to vehicular traffic or the consumption of electricity and natural gas beyond what is currently generated by the existing multi-family residential buildings on the Project Site. Therefore, Alternative 2 would have less than significant operational air quality impacts associated with regional emissions and impacts would be less than the less-than-significant impacts of the Project.

Localized Emissions

As discussed previously, Alternative 2 would not result in construction of new buildings or increased operations that could generate additional operational emissions related to vehicular traffic or the consumption of electricity and natural gas beyond what is currently generated by the existing multi-family residential buildings on the Project Site. The only increase in activity under this alternative would be the renovation of nine currently uninhabitable units on site. Therefore, less than significant operational air quality impacts associated with localized emissions would occur under Alternative 2 and impacts would be less than the less-than-significant impacts of the Project.

Toxic Air Contaminants

As analyzed in **Section 4.2**, Air Quality, of this Draft EIR, the Project would result in some TAC emissions, primarily from mobile sources. Since Alternative 2 would not result in new development or increase the intensity of the existing uses on the Project Site, no new increase in mobile source emissions would occur. No operational impacts associated with TACs would occur under Alternative 2, and such impacts would be less when compared to the less-than-significant impacts of the Project.

5.6.2.3 Biological Resources

The Non-Historically Compliant Rehabilitation Alternative would renovate the existing buildings, and would involve demolition of only some interior and exterior components of the buildings, and not the buildings themselves However, this alternative would eliminate and replace most of the existing landscaping on site. Similar to the Project, Alternative 2 would also result in indirect impacts on nesting birds from increased noise, vibration, and dust during renovation construction and would impact migratory non-game breeding birds. Alternative 2 would implement the same mitigation measures as the Project to reduce impacts to nesting birds to a less-than-significant level after mitigation. Therefore, Alternative 2 would have similar impacts on biological resources when compared to the Project, which would be less than significant after mitigation.

5.6.2.4 Cultural Resources

Archaeological Resources

The Non-Historically Compliant Rehabilitation Alternative would renovate the existing buildings, and would involve demolition of only some interior and exterior components of the buildings, and not the buildings themselves, and the Rose Hill Courts would have no change in operations. In the absence of demolition, grading, or other earthwork activities for new buildings this alternative would have no impact on subsurface cultural resources and would be less than the less-than-significant impact of the Project.

Historical Resources

Under Alternative 2, there would be considerable alteration of the character-defining features of the buildings themselves as well as the landscaping. There has already been some alteration to the buildings in for the purposes of maintenance, modernization, upkeep and other factors. (See **Section 3.1**, page 15 of **Appendix L.**) There has also been considerable alteration of the original landscaping brought about by maintenance as well as modifications by the residents, though some features of the original landscaping are still visible. (See **Section 3.2**, page 21 of **Appendix L.**)

The Non-Historically Compliant Rehabilitation Alternative would still result in significant impacts on the remaining historic integrity of the buildings as it is assumed that the work under this alternative would not meet the Secretary of the Interior's Standards, as discussed in CEQA § 15064.5(b)(3) and Section 4.4, Cultural Resources in this Draft EIR. Alternative 2 would materially impair Rose Hill Courts because it would no longer be listed in the CRHR and would no longer be eligible for listing in the NRHP due to the substantial loss of the remaining historic integrity. The Rose Hill Courts location would still retain its association with the development of public and defense worker housing in Los Angeles during the Second World War but would lose its integrity as a Los Angeles public housing complex based on the planning and design principles of the Garden City and Modern movements. The aspects that would be lost include characteristics of garden apartments such as the use of

superblocks in development of the site, the segregation of automobile and pedestrian traffic, low to medium density and building coverage, the standardization of building types with a maximum of three stories in height, and an emphasis on open space. The integrity of workmanship of the original design such as the lack of exterior ornament, the presence of low-pitched roofs, and the horizontal lines created by bands of windows that reflect the modernist aesthetic would be lost under this alternative. For compliance with CEQA, the lead agency (HACLA) is required to identify potentially feasible measures to mitigate significant impacts and to ensure that any adopted measures to mitigate or avoid significant adverse changes are fully enforceable through permit conditions, agreements, or other measures. Because the impact of the Non-Historically Complaint Rehabilitation Alternative is technically equivalent to the Project that involves demolition of the current structures, the same mitigation measures as those recommended for the Project are recommended for Alternative 2. Even with implementation of these mitigation measures for the Non-Historically Compliant Rehabilitation Alternative, potential impacts of this alternative to historical resources would be significant and unavoidable.

5.6.2.5 Geology and Soils

Geology and Soils

The Non-Historically Compliant Rehabilitation Alternative would renovate the existing buildings, and would involve demolition of only some interior and exterior components of the buildings, and not the buildings themselves. With this alternative, the potential for soil loss would remain less than significant and would be minimized or avoided through the implementation of construction stormwater BMPs such as those typically described in a Project SWPPP.

However, under this alternative, the potential for seismically-induced ground settlement, liquefaction, lateral spreading, expansive soils, and landslides would remain as they are described for the Project and in the Geotechnical Investigation (**Appendix J**) because those are the baseline conditions of the Rose Hill Courts site. Geology and soils impacts resulting from construction of the Non-Historically Compliant Rehabilitation Alternative would be less than significant. Furthermore, impacts related to geology and soils would be less when compared to those of the less than significant impacts associated with the Project. Since demolition of the existing buildings would not occur and no new housing would be constructed under this alternative, it would have less impacts than the less-than significant impacts of the Project.

Paleontological Resources

The Non-Historically Compliant Rehabilitation Alternative would include no demolition of existing buildings or any new construction, only new landscaping with minimal soil disturbance, grading or excavation on the existing Project Site, and therefore it would not result in potential impacts to paleontological resources due to construction. Alternative 2 would have no impacts to paleontological resources, which would be less than the Project's less-than-significant impacts after mitigation**.**

5.6.2.6 Greenhouse Gas Emissions

The Non-Historically Compliant Rehabilitation Alternative would include no demolition of existing buildings or any new construction, only renovation, and Rose Hill Courts would have no change in operations. Due to renovation activities and increase in habitable units on site, new GHG emissions would be generated under Alternative 2 and new impacts beyond existing conditions associated with

global climate change would occur. However, the impacts related to GHG emissions under this alternative would be minimal. Therefore, the Non-Historically Compliant Rehabilitation Alternative impacts regarding GHG emissions would be less than the less-than-significant GHG emissions impacts of the Project.

5.6.2.7 Hazards and Hazardous Materials

The Non-Historically Compliant Rehabilitation Alternative would involve demolition of only some interior and exterior components of the buildings, and not the buildings themselves. Therefore, Alternative 2 would not have the potential to uncover subsurface hazards or hazardous materials. In addition, this alternative would not result in new development or significant increases in operations that would use or potentially generate hazardous materials.

Furthermore, since Alternative 2 would not result in significant changes to the current operation, configuration, or number of residents at the Project Site, less-than-significant impacts would occur to the current emergency response or evacuation plans for the site and number of residents if they were to be implemented. Therefore, impacts to emergency response or evacuation plans from this alternative would be less than the less-than-significant impacts of the Project.

Under Alternative 2, even though the existing Project Site buildings would not be demolished, there still remains the potential for ACMs and LBP to be disturbed. This alternative would include removal of ACMs, LBP, and lead in plumbing components and water supply lines, and would require design features to minimize radon accumulation, if radon testing indicated that elevated levels of radon are present. Lead and asbestos would be abated under this alternative and the buildings would also be re-piped with new plumbing which would eliminate the potential for lead in drinking water. Alternative 2 would implement the same mitigation measures as the Project to reduce impacts associated with hazardous materials. Renovation activities under this alternative would be implemented in accordance with all applicable laws. Implementation of this alternative would require complying with existing local, state, and federal regulations. Therefore, the impact would be less than significant and similar to the less-than-significant impacts associated with the Project after mitigation.

5.6.2.8 Land Use and Planning

Land Use Compatibility

Since the Non-Historically Compliant Rehabilitation Alternative would not develop new land uses on the Project Site, the existing onsite and/or offsite land uses would not be altered, and existing land use relationships would remain. As such, no impacts related to land use compatibility would occur under Alternative 2. Under the Project, even after development, the land use would remain the same and no impact to land use compatibility would occur. Therefore, impacts regarding land use compatibility under Alternative 2 would be similar when compared to the no impact of the Project.

Land Use Consistency

The Non-Historically Compliant Rehabilitation Alternative would involve rehabilitation of the existing multi-family housing units on the Project Site. There would be a minimal increase in the number of occupied housing units from the existing 91 habitable units to 100 habitable units because this alternative would make all 100 units on the Project Site habitable. There would be demolition of only some interior and exterior components of the buildings, and not the buildings themselves and

no construction of additional housing and no changes to the operational characteristics of the existing multi-family residential buildings. Although building permits would still be required, no land use approvals would be required. Therefore, Alternative 2 would not result in any inconsistencies with existing land use plans and policies that govern the Project Site. No impacts associated with consistency with land use regulations and plans would occur, and impacts would be less than the less-than-significant impacts of the Project.

However, it should be noted that, unlike the Project, Alternative 2 would not advance local and regional planning objectives that promote the development of new housing to meet affordable housing demand. There would be no new development onsite and Alternative 2 would not result in an increase of needed affordable housing units in the City of Los Angeles.

5.6.2.9 Noise

Construction

The Non-Historically Compliant Rehabilitation Alternative would renovate the existing buildings, with demolition of only some interior and exterior components of the buildings, and not the buildings themselves, with no construction of new structures; the only potential (and temporary) noise sources would be a minimal amount of exterior work for renovation activities and new landscaping. The major renovation work would be conducted inside the buildings, which significantly attenuate the noise emitted to the outside. Renovation also uses smaller and less powerful construction equipment and for a shorter duration, thus generating lower noise emissions than would demolition and new construction. However, Alternative 2 would implement the same mitigation measures as the Project to reduce impacts associated with onsite and offsite construction noise. Therefore, under Alternative 2, short-term noise impacts during the construction phase would be less than significant and less than the Project, which would be significant and unavoidable after mitigation.

Operation

Alternative 2 would not develop new uses on the Project Site and would have no significant change in existing site operations. The only minimal change in intensity of use would be generated by the additional nine habitable units that would be renovated under this alternative. No significant stationary or mobile noise sources would be introduced to the Project Site or the project vicinity. Therefore, long-term operational noise impacts associated with Alternative 2 would be less than significant and less when compared to the less-than-significant noise impacts associated with the Project.

5.6.2.10 Population and Housing

Under Alternative 2, two to three buildings would be rehabilitated at a time, and residents would be temporarily relocated off site. Full relocation assistance would be provided. No existing buildings would be demolished and no new construction would occur. This alternative would have less than significant population and housing impacts because no additional units beyond the current 100 units onsite would be created. There would be a minimal increase in the number of occupied housing units from the existing 91 habitable units to 100 habitable units because this alternative would make all 100 units on the Project Site habitable. Similar to the Project, Alternative 2 would also lead to temporary short-term displacement and relocation of the existing tenants residing on the Project Site while units are rehabilitated. When the residents return to a renovated unit, the households would need to be “right sized” under the new Section 8 occupancy standards and therefore not all residents

may be able to return to a right size unit. Those residents would be provided with a portable Section 8 voucher and relocation assistance, which would allow them to move permanently off site, so the impact would be less than significant. Therefore, impacts associated with the displacement of people under this alternative would be less-than-significant but greater than the less-than-significant impact of the Project.

However, unlike the Project, Alternative 2 would not advance local and regional planning objectives that promote the development of new housing to meet affordable housing demand and estimated population projections. This alternative would not help the City of Los Angeles meet its affordable housing needs.

5.6.2.11 Public Services

Fire Protection

Construction

The Non-Historically Compliant Rehabilitation Alternative would involve demolition of only some interior and exterior components of the buildings, and not the buildings themselves. Renovation construction would be of a smaller scale and shorter duration than the Project. As such, Alternative 2 would have less potential during construction to expose people to the risk of fire or explosion related to the use of hazardous materials or to potentially impact the provision of fire protection services in the vicinity of the Project Site. Thus, potential construction-related fire protection impacts would be less under Alternative 2 when compared to the less-than-significant impacts of the Project.

Operation

There would be no potential to increase the level of activity on the Project Site or increase the service population for the LAFD stations that would serve the Project Site. No long-term impacts to fire protection and emergency services would occur under Alternative 2, and impacts would be less when compared to the less-than-significant impacts of the Project.

Police Protection

Construction

Under the Non-Historically Compliant Rehabilitation Alternative, there is a short-term increase of the potential for construction to create the possibility for trespassing, vandalism, sources of nuisances and hazards, or potentially impact police protection services in the vicinity of the Project Site during renovation. However, renovation construction would be of a smaller scale and shorter duration than the Project and temporary fencing erected during the construction phase would serve to feasibly deter such activities. Alternative 2 would implement the same mitigation measures as the Project to reduce impacts associated with police protection. Thus, potential construction-related police protection impacts would be less under Alternative 2 when compared to the less-than-significant impacts of the Project after mitigation.

Operation

There would be a minimal increase in the number of occupied housing units from the existing 91 habitable units to 100 habitable units because this alternative would make all 100 units on the

Project Site habitable. There would be a minor increase in the service population and level of activity on the Project Site and thus only a minor increase for the LAPD station that would serve the Project Site. No long-term impacts to police protection services would occur under Alternative 2, and impacts would be less when compared to the less-than-significant impacts of the Project.

Schools

Construction

Under the Non-Historically Compliant Rehabilitation Alternative, the existing buildings would be renovated, and demolition of only some interior and exterior components of the buildings, and not the buildings themselves would occur. Renovation construction would be of a smaller scale and shorter duration than the Project. Alternative 2 would not create the potential for construction employment to result in an increase in the resident population or corresponding demand for schools in the vicinity of the Project Site. Therefore, Alternative 2 would not result in any school impacts due to construction, and impacts would be less when compared to the less-than-significant impacts of the Project.

Operation

Under Alternative 2, there would be a minimal increase in the number of occupied housing units from the existing 91 habitable units to 100 habitable units. As there would be a negligible increase in housing units, there would be an insignificant increase in Project Site residents and therefore, there would be a negligible potential to increase the population of school-aged children in the attendance boundaries of the schools within the LAUSD that serve the Project. Accordingly, no long-term impacts to school services would occur under Alternative 2, and impacts would be less than the Project 's less-than-significant impact on school services.

Recreation and Parks

Construction

Under the Non-Historically Compliant Rehabilitation Alternative, there would be potential short-term construction impacts (associated with air quality, noise, and traffic) to users of parks and recreation facilities in the project area. Similar to the Project, this alternative may also create access issues or require a traffic plan for parks and recreation facilities in the area. Alternative 2 would implement the same mitigation measure as the Project to reduce impacts associated with recreation and parks during construction. Therefore, temporary construction related impacts on parks and recreational facilities would be less than significant after mitigation and similar to the Project, which would be less than significant after mitigation.

Operation

As there would be a minimal increase in the number of occupied housing units from the existing 91 habitable units to 100 habitable units, there would be no significant increase in the use of recreational facilities and open space in the long-term during project operation. Less than significant impacts to parks and recreational facilities would occur under Alternative 2, and impacts would be less than the less-than-significant impacts of the Project.

Libraries

Construction

Under the Non-Historically Compliant Rehabilitation Alternative, the existing buildings would be renovated, and demolition of only some interior and exterior components of the buildings, and not the buildings themselves would occur. Renovation construction would be of a smaller scale and shorter duration than the Project. Alternative 2 would not create the potential for construction employment to result in an increase in the resident population or corresponding demand for libraries in the vicinity of the Project Site. Therefore, Alternative 2 would not result in any library impacts due to construction, and impacts would be less when compared to the less-than-significant impacts of the Project.

Operation

Alternative 2 would not construct new development and lead to a slight increase (nine units) in habitable units on site. Therefore, Alternative 2 would not significantly increase the library service population. However, additional tax revenues from new development at the site (a portion of which goes to fund City library facilities and services) would not be generated. Less than significant impacts to library services would occur under Alternative 2, and impacts would be less when compared to the less-than-significant impacts of the Project.

5.6.2.12 Transportation

Construction

The Non-Historically Compliant Rehabilitation Alternative would have construction impacts similar to those of the Project, albeit of lesser magnitude. Renovation construction would be of a smaller scale and shorter duration than the Project. Under this alternative, rehabilitation work during project construction would generate vehicle trips associated with construction equipment, haul trucks, or construction worker vehicles. Additionally, there would be potential for access and safety, bus/transit, and on-street parking impacts during construction. To the extent necessary, Alternative 2 would implement the same mitigation measures as the Project to reduce impacts associated with transportation and traffic. Therefore, construction impacts under Alternative 2 would be less than significant after mitigation. Since renovation construction would be of a smaller scale and shorter duration than the Project, Alternative 2 would have less impacts than the less-than-significant impacts of the Project.

Operation

Alternative 2 would not develop new or additional land uses on the Project Site. This alternative would increase the number of existing habitable residential units on site from 91 to 100. Therefore, there could be a slight increase in vehicle trips or parking demand or bus/transit ridership, in the project vicinity during Project operation. However, given the minimal increase in the number of habitable units, impacts with respect to operational traffic, including intersection levels of service; the regional transportation system; neighborhood intrusion; access and circulation; and bicycle, pedestrian, and vehicular safety would be less than significant. Under this alternative, long-term transportation and traffic impacts during project operation would be less than those of the Project's less-than-significant impacts due to the limited number of habitable units and residents who would be added to the Project Site.

5.6.2.13 Tribal Cultural Resources

The Non-Historically Compliant Rehabilitation Alternative would include no demolition of existing buildings or any new construction. This alternative would include only renovation of existing buildings and landscaping, and the Rose Hill Courts would have no significant change in operations. Therefore, there would be less potential for Alternative 2 to uncover subsurface tribal cultural resources. As such, impacts to tribal cultural resources would be less when compared to the Project, which would be less than significant.

5.6.2.14 Wildfire

Construction

The Non-Historically Compliant Rehabilitation Alternative, would include renovation of the existing buildings and demolition of only some interior and exterior components of the buildings, and not the buildings themselves. Similar to new development under the Project, this alternative has the potential to create fire hazards associated with the use or release of potentially flammable materials, or generate flammable waste, or the use and storage of hazardous and flammable materials during construction that could potentially become a fire hazard. However, renovation work uses smaller and less powerful construction equipment compared to demolition and new construction. Therefore, this alternative would have less short-term construction wildfire impacts when compared to the less-than-significant impacts of the Project.

Operation

Under this alternative, there would be a minimal increase in the number of occupied housing units from the existing 91 habitable units to 100 habitable units. Similar to the Project, Alternative 2 would renovate existing buildings with new materials and features that would be up to code and provide the highest level of fire protection. The renovated buildings would include required fire suppression design features (i.e., fire-resistant building materials, where appropriate, smoke detection and fire alarm systems, automatic sprinkler systems (in compliance with all applicable City and Fire codes), portable fire extinguishers, and emergency signage in all buildings, and required brush clearance), identified in the latest edition of the California Building Code. Therefore, impacts related to wildfires would be less than significant. This alternative would have less long-term operational wildfire impacts when compared to the less-than-significant impacts of the Project, due to the fewer number of residential units proposed under this alternative.

5.6.2.15 Energy

Energy Use

<u>Construction</u>

The Non-Historically Compliant Rehabilitation Alternative would include renovation of the existing buildings and demolition of only some interior and exterior components of the buildings, and not the buildings themselves. Renovation construction would be of a smaller scale and shorter duration than that of the Project. Therefore, Alternative 2 would generate a short-term lesser demand for energy during construction, and construction-related impacts to energy would be less than significant. The Non-Historically Compliant Rehabilitation Alternative would require a commitment of resources for construction such as building materials, fuel, and the transportation of goods and people to and from

the Project but on a much smaller scale than the Project. As such, short-term impacts from construction under Alternative 2 would be less when compared to the less-than-significant impacts of the Project.

Operation

Alternative 2 would not alter the existing land uses or site operations on the Project Site. As there would only be a minimal (nine-unit) increase in housing units under this alternative, there would not be a large increase in the number of Project Site residents and therefore, there would be no significant increase in operational usage of energy. Furthermore, Alternative 2 would include energy efficiency improvements that would decrease the energy requirements of the existing buildings. Therefore, long-term impacts associated with increased energy demand under Alternative 2 would be less than significant and much less when compared to the less-than-significant operational impacts of the Project.

Infrastructure Capacity

Construction

Renovation construction would be of a smaller scale and shorter duration than that of the Project. Therefore, Alternative 2 would generate a short-term lesser demand for energy during construction that would use existing energy infrastructure capacity. As such, impacts under Alternative 2 would be less when compared to the less-than-significant impacts of the Project.

Operation

The Non-Historically Compliant Rehabilitation Alternative would not alter the existing land uses or operations on the Project Site. Alternative 2 would only increase the number of existing habitable residential units on site from 91 to 100 thus there would only be a minimal increase to long-term energy demand on the Project Site. Therefore, less than significant operational impacts related to energy infrastructure would occur under Alternative 2, and impacts would be less when compared to the less-than-significant impacts of the Project.

5.6.3 Comparison of Alternative to the Proposed Project

The Non-Historically Compliant Rehabilitation Alternative would not avoid the Project's significant and unavoidable impacts to aesthetics and cultural resources (with respect to historical resources). However, it would reduce the Project's short-term significant and unavoidable impacts of onsite and offsite construction noise to a less-than-significant level after mitigation. Alternative 2 would also have a lesser environmental impact than the Project with regards to air quality, geology and soils and paleontological resources, greenhouse gas emissions, land use and planning, population and housing, public services, transportation, tribal cultural resources, wildfire, and energy. Impacts associated with the remaining environmental issues would be similar to those of the Project.

5.6.4 Relationship of the Alternative to Project Objectives

Under the Non-Historically Compliant Rehabilitation Alternative, the following objective would be fully met:

- To provide a site that enhances security and provides for safe and useable open/green space.

Under this alternative, only the following objectives would be partially met:

- To design the project in a manner that maximizes accessibility, energy efficiency and contemporary amenities.
- To provide a long-term useful life of buildings to minimize the future need for investment in affordable housing rehabilitation and repairs.

Alternative 2 would not meet the following objectives:

- To provide a substantial increase in the number of affordable housing units than exist today at the Project Site, consistent with the goals of HACLA's 25-Year Vision Plan, *Build* HOPE, to expand affordable housing opportunities and increase the permanent affordable housing supply in Los Angeles.
- To maximize the opportunity for existing tenants to return once the project is completed by matching their household size to a "right size" unit.
- To assist the City of Los Angeles in meeting its affordable housing needs and goals.
- To increase and locate onsite parking in closer proximity to the housing units.
- To maximize housing in close proximity to transit and parks.

5.7 Analysis of Alternative 3 – Historic Rehabilitation Alternative

5.7.1 Description of the Alternative

This alternative would redevelop the existing units at Rose Hill Courts in a way that would preserve the historic integrity of the buildings by meeting the Secretary of the Interior's Standards. This alternative would restore the characteristics of the Garden Style design utilized in the Rose Hill Courts development, including, but not limited to, low-slung buildings, large open spaces, and recreational amenities. Also in accordance with the Citywide Design Guidelines (Los Angeles Department of City Planning, 2011, p. 23) special design considerations would include preserving original building materials and architectural features; preserving, repairing, and replacing, as appropriate, building elements and features that are important in defining historic character; and retaining the original building continuity, rhythm, and form created by these features.

Alternative 3 would also consist of updating the existing 100 units with: (1) lead and asbestos remediation; (2) structural and seismic repairs; and (3) replacement of major building systems. Proposed improvements would include:

- Interior improvements including removal of all interior finishes and new drywall, paint, flooring and interior light fixtures, at all living areas, kitchens and bathrooms; addition of bathrooms, and installation of new electrical, plumbing, mechanical systems and appliances.
- Health and Safety Improvements including removal of dry rot, termite damage and mold; lead and asbestos remediation; structural/seismic repairs.

This alternative would rehabilitate the exterior of the buildings in a manner that would meet the requirements in the Secretary of the Interior's Standards and consistent with the 1940s era garden apartments. The Historic Rehabilitation Alternative would retain the existing 100 units on the Project Site and would not allow for the opportunity to increase the number of affordable housing units on the Project Site. There would be a minimal increase in the number of occupied housing units from the existing 91 habitable units to 100 habitable units because this alternative would make all 100 units on the Project Site habitable. Residents would be temporarily relocated during historic rehabilitation of the units.

Under this Alternative, the low-income use of the site would change from the current HUD public housing program to a HUD Section 8 Project Based Voucher ("PBV") subsidy program. Redevelopment would involve the temporary relocation of residents during the rehabilitation of units. When residents return to a renovated unit with Section 8 PBV subsidy, they would need to be "right sized" to the new occupancy standards and thus not all residents would be able to return to the same sized unit they currently reside in. Since only nine additional units would be added (for a total of 100) due to rehabilitation, not all current residents may be able to return to Rose Hill Courts due to the change in occupancy size standards.

5.7.2 Environmental Impacts

5.7.2.1 Aesthetics

Scenic Vistas

Under Alternative 3, the existing buildings would be redeveloped to preserve the historic integrity of the buildings. This alternative would restore the characteristics of the Garden Style design utilized in the Rose Hill Courts development. As such, Alternative 3 would not result in an increase in height or massing of onsite structures, and existing views of and across the Project Site would remain the same. As discussed in the Initial Study prepared for the Project, included as **Appendix B** of this Draft EIR, there are no scenic views or vistas afforded on or through the Project Site. Therefore, Alternative 3 would not have the potential to obstruct a scenic vista, and no impacts to scenic vistas would occur. Thus, impacts related to scenic vistas would be similar when compared to the Project, which would have no impact to scenic vistas.

Visual Character

<u>Construction</u>

Under the Historic Rehabilitation Alternative, there would be potential for short-term impacts to aesthetic and visual resources during rehabilitation activities. Alternative 3 would involve rehabilitation of the existing buildings and demolition of only some interior and exterior components of the buildings, and not the buildings themselves. The construction activities under this alternative would be limited to rehabilitation and improvement of existing 100 residential units on the Project Site and most of the work would consist of rehabilitation of the existing building interiors. Any work on the exterior of the buildings would be to preserve the historic character of the buildings. This alternative would create minimal temporary changes in views associated only with construction staging areas, and stockpiling of construction materials and equipment for rehabilitation. Therefore, less than significant impacts associated with existing visual quality of the site and its surroundings would occur during the construction phase of this alternative. Impacts related to visual character

during construction would be less when compared to the significant and unavoidable impacts of the Project after mitigation.

Operation

This alternative would improve the aesthetic conditions on the Project Site and would retain the historic design of the original development. This alternative includes the removal of exterior "mansard" roofs at the patios and replacement of non-historic windows with historic compliant windows. This alternative would retain the historic integrity and therefore would avoid the aesthetic impact on historic resources. Furthermore, Alternative 3 would comply with and be consistent with the Citywide Design Guidelines special design considerations for historic properties (Los Angeles Department of City Planning, 2011, p. 23). Therefore, Alternative 3 would have no impacts on existing visual character of the site and its surroundings, and would be less than the Project's impacts to aesthetics, which would be significant and unavoidable after mitigation.

Shading

Alternative 3 would not create or cast new shadows on surrounding sensitive uses since new buildings would not be constructed on the Project Site. Improvements in existing buildings under this alternative might change the shadows cast, however the change in shadows is not expected to be significantly different when compared to existing conditions. Existing shadows from the existing multi-family residential buildings and street trees currently do not generate shadows on surrounding sensitive uses. Therefore, less than significant impacts related to shade and shadow would occur under Alternative 3. Thus, shading impacts under Alternative 3 would be less in comparison to the less-than-significant shade and shadow related impacts of the Project.

Light and Glare

Construction

Alternative 3 would involve rehabilitation of the existing buildings and demolition of only some interior and exterior components of the buildings, and not the buildings themselves. The construction activities under this alternative would be limited to rehabilitation and improvement of existing units on the Project Site and most of the work would consist of rehabilitation of the existing building interiors. Rehabilitation would require the use of smaller and less powerful construction equipment and for a shorter duration, thus resulting in less opportunity for light and glare to be introduced than would demolition and new construction. Therefore, less-than-significant light and glare impacts would occur under Alternative 3 from construction. Overall, impacts related to construction light and glare under Alternative 3 would be less in comparison to the less-than-significant light and glare related impacts of the Project.

Operation

Artificial lighting is currently utilized onsite and in the surrounding area for security, parking, signage, architectural highlighting, and landscaping/decorative purposes. Street lights and traffic on local streets also contribute to the ambient light levels in the area. Alternative 3 would improve existing buildings and existing sources of lighting on the Project Site. No additional units with additional windows and lighting would be constructed under this alternative, therefore less than significant impacts to lighting and glare would occur. Alternative 3 would not alter the existing uses on the Project Site, introduce significant new sources of light or glare on the Project Site, or otherwise

increase the amount of activity occurring onsite. Therefore, this alternative would not significantly change the existing lighting environment on the Project Site. Less than significant operation-related light and glare impacts would occur under Alternative 3. Overall, impacts related to operational light and glare under Alternative 3 would be less in comparison to the less-than-significant light and glare related impacts of the Project.

5.7.2.2 Air Quality

Construction

Regional Emissions

The Historic Rehabilitation Alternative would include rehabilitation of the existing buildings and demolition of only some interior and exterior components of the buildings, and not the buildings themselves. Therefore, similar to the Project. Alternative 3 would lead to construction emissions (due to rehabilitation) associated with construction worker and construction truck traffic, fugitive dust from construction activities, or the use of construction equipment, and construction-related regional air quality impacts. However, the construction related impacts under this alternative would be less when compared to the less-than-significant regional construction air quality impacts associated with the Project. Under this alternative, there would be much less exterior construction activity compared to the Project. If the rehabilitation process exposes asbestos, the requirements of South Coast Air Quality Management District (SCAQMD) Rule 1403 would prevent public exposure. Construction impacts on air quality would remain less than significant.

Localized Emissions

As discussed previously, the Historic Rehabilitation Alternative would include no demolition of existing buildings or new construction, only rehabilitation of existing buildings. Therefore, similar to the Project, Alternative 3 would create construction emissions (due to rehabilitation) associated with construction worker and construction truck traffic, fugitive dust from construction activities, or the use of construction equipment, and construction-related regional air quality impacts. However, the localized construction related impacts under this alternative would be less when compared to the less-than-significant localized construction air quality impacts associated with the Project. If the rehabilitation process exposes asbestos, the requirements of South Coast Air Quality Management District (SCAQMD) Rule 1403 would prevent public exposure. Construction impacts on air quality would remain less than significant.

Toxic Air Contaminants

Construction activities would still occur on the Project Site for rehabilitation of the existing buildings; thus, the Historic Rehabilitation Alternative would result in diesel particulate emissions during construction that could generate substantial toxic air contaminants (TACs). However, construction activities and duration for rehabilitation would have less impacts associated with the release of TACs. As such, TAC impacts under Alternative 3 would be less when compared to the less-than-significant impacts of the Project.

Operation

Regional Emissions

Alternative 3 would not result in new construction or increased operations that could generate additional operational emissions related to vehicular traffic or the consumption of electricity and natural gas beyond what is currently generated by the existing multi-family residential buildings on the Project Site. There would be an increase in the number of occupied housing units from 91 to 100 habitable units. This increase would be minimal compared with the increase under the Project. The Historic Rehabilitation Alternative's regional operational air quality impacts would therefore also be less than significant and less when compared to the less-than-significant regional operational air quality impacts associated with the Project.

Localized Emissions

As discussed previously, Alternative 3 would not result in construction of new buildings or increased operations that could generate additional operational emissions related to vehicular traffic or the consumption of electricity and natural gas beyond what is currently generated by the existing multi-family residential buildings on the Project Site. The only increase in activity under this alternative would be the rehabilitation of existing units onsite. Therefore, operational air quality impacts from localized emissions under Alternative 3 would be less than significant and much less than the less-than-significant impacts of the Project.

Toxic Air Contaminants

As analyzed in **Section 4.2**, Air Quality, of this Draft EIR, the Project would result in some TAC emissions, primarily from mobile sources. Since Alternative 3 would not result in new development or increase the intensity of the existing uses on the Project Site, no new increase in mobile source emissions would occur. No operational impacts associated with TACs would occur under Alternative 3, and such impacts would be less when compared to the less-than-significant impacts of the Project.

5.7.2.3 Biological Resources

The Historic Rehabilitation Alternative would not include demolition of existing buildings and would not include construction of new buildings It would only include rehabilitation of the existing buildings. There would be no significant change in the amount of vegetated area onsite. This alternative would remove existing landscaping and some trees. These would be replaced with new landscaping and trees. This alternative would provide enhancements to the common play areas. The play area by the existing community building would likely be reconfigured and there would need to be some additional ramps/accessible routes to connect accessible parking to the community building.

Similar to the Project, Alternative 3 would also result in indirect impacts on nesting birds from increased noise, vibration, and dust during rehabilitation and would impact migratory non-game breeding birds. Alternative 3 would implement the same mitigation measures as the Project to reduce impacts to nesting birds. As such, this alterative would have similar impacts to biological resources as the Project, which would be less than significant after mitigation.

5.7.2.4 Cultural Resources

Archaeological Resources

The Historic Rehabilitation Alternative would remove the exterior "mansard" roofs at the patios and non-historic windows on site would be replaced with historic compliant ones. It is anticipated that this alternative would remove existing landscaping and some trees and would replace these with new landscaping/trees. Additionally, enhancements to the common play areas would be made and the play area near the community building would likely be reconfigured. Since the Historic Rehabilitation Alternative would include no demolition of existing buildings or any new construction, only rehabilitation, and the Rose Hill Courts would have no change in operations, this alternative would have no impact on subsurface cultural resources and thus less impact than the less-than-significant impacts of the Project.

Historical Resources

The Historic Rehabilitation Alternative would rehabilitate the existing units at Rose Hill Courts in a way that would preserve the historic integrity of the buildings by conforming to the Secretary of the Interior's Standards, as discussed in CEQA § 15064.5(b)(3) and Section 4.4, Cultural Resources. This alternative would not include demolition, grading, or other earthwork activities that could potentially affect onsite historic resources. This alternative would rehabilitate the character-defining features of the Garden City and Modern movements utilized in the Rose Hill Courts development, including but not limited to low-slung buildings, large open spaces, and recreational amenities. Some construction would occur due to rehabilitation but any impacts to the historic buildings would be temporary and minimal during rehabilitation. No mitigation is required given compliance with the Secretary of the Interior's Standards. Therefore, there would be no impacts to historical resources under Alternative 3, and impacts would be less when compared to the Project, which would be significant and unavoidable after mitigation.

5.7.2.5 Geology and Soils

Geology and Soils

The Historic Rehabilitation Alternative would not result in demolition or new construction. With this alternative, the potential for soil loss would remain less than significant and would be minimized or avoided through the implementation of construction stormwater BMPs such as those typically described in a project SWPPP. Under this alternative some pathways would be removed and replaced. Overall, this alternative would include stormwater retention/treatment so runoff would be eliminated and overall permeability/impermeability would not change substantially.

However, under this alternative, the potential for seismically-induced ground settlement, liquefaction, lateral spreading, expansive soils, and landslides would remain as they are described for the Project in **Section 4.5,** Geology and Soils, of this document and in the Geotechnical Investigation (**Appendix J**) because those are the baseline conditions of the Rose Hill Courts site. Geology and soils impacts resulting from construction of the Historic Rehabilitation Alternative would be less than significant. Furthermore, impacts related to geology and soils would be less when compared to those of the less-than-significant impacts associated with the Project. Since demolition of the existing buildings would not occur and no new housing would be constructed under this alternative, it would have less impacts than the less-than significant impacts of the Project.

Paleontological Resources

The Historic Rehabilitation Alternative would involve rehabilitation of the existing buildings and demolition of only some interior and exterior components of the buildings, and not the buildings themselves, it would not require soil disturbance or grading and excavation on the existing Project Site, and therefore it would not result in potential impacts to paleontological resources due to construction. Alternative 3 would have no impacts to paleontological resources, which would be less than the Project's less-than-significant impact after mitigation.

5.7.2.6 Greenhouse Gas Emissions

The Historic Rehabilitation Alternative would include rehabilitation of the existing buildings and demolition of only some interior and exterior components of the buildings, and not the buildings themselves, and Rose Hill Courts would have no change in operations. Due to renovation activities and increase in habitable units on site, new GHG emissions would be generated under Alternative 3 and new impacts beyond existing conditions associated with global climate change would occur. However, the impacts related to GHG emissions under this alternative would be minimal. Therefore, the Historic Rehabilitation Alternative impacts regarding GHG emissions would be less than the less-than-significant GHG emissions impacts of the Project.

5.7.2.7 Hazards and Hazardous Materials

The Historic Rehabilitation Alternative would involve rehabilitation of the existing buildings and demolition of only some interior and exterior components of the buildings, and not the buildings themselves. Therefore, Alternative 3 would not have the potential to uncover subsurface hazards or hazardous materials. In addition, this alternative would not result in new development or significant increases in operations that would use or potentially generate hazardous materials.

Furthermore, since Alternative 3 would not result in significant changes to the current operation, configuration, or number of residents at the Project Site, less than significant impacts would occur to the current emergency response or evacuation plans for the site and number of residents if they were to be implemented. Therefore, impacts to emergency response or evacuation plans from this alternative would be less than the less-than-significant impact of the Project.

Under the Historic Rehabilitation Alternative, even though the existing Project Site buildings would not be demolished, there still remains the potential for ACMs and LBP to be disturbed. This alternative would include removal of ACMs, LBP, and lead in plumbing components and water supply lines, and would require design features to minimize radon accumulation, if radon testing indicated that elevated levels of radon are present. Lead and asbestos would be abated under this alternative and the buildings would also be re-piped with new plumbing which would eliminate lead in drinking water. Alternative 3 would implement the same mitigation measures as the Project to reduce impacts associated with hazardous materials. Rehabilitation activities under this alternative would be implemented in accordance with all applicable laws. Implementation of this alternative would require complying with existing local, state, and federal regulations. Therefore, the impact would be less than significant and similar to the impacts of the Project, which would be less than significant after mitigation.

5.7.2.8 Land Use and Planning

Land Use Compatibility

Since the Historic Rehabilitation Alternative would not develop new land uses on the Project Site, the existing onsite and/or offsite land uses would not be altered, and existing land use relationships would remain. As such, no impacts related to land use compatibility would occur under Alternative 3. Under the Project, even after development, the land use would remain the same and no impact to land use compatibility would occur. Therefore, impacts regarding land use compatibility under Alternative 3 would be similar when compared to the no impact of the Project.

Land Use Consistency

The Historic Rehabilitation Alternative would involve rehabilitation of the existing multi-family housing units on the Project Site. There would be a minimal increase in the number of occupied housing units from the existing 91 habitable units to 100 habitable units because this alternative would make all 100 units on the Project Site habitable. There would be no demolition of existing buildings and no construction of additional housing and no changes to the operational characteristics of the existing multi-family residential buildings. No land use approvals or permits would be required. Therefore, Alternative 3 would not result in any inconsistencies with existing land use plans and policies that govern the Project Site. No impacts associated with consistency with land use regulations and plans would occur. Land use impacts under Alternative 3 would be less than the less-than-significant land use-related impacts of the Project.

However, it should be noted that, unlike the Project, Alternative 3 would not advance local and regional planning objectives that promote the development of new housing to meet affordable housing demand. There would be no new development onsite and Alternative 3 would not result in an increase the supply of much needed affordable housing units in the City of Los Angeles.

5.7.2.9 Noise

Construction

The Historic Rehabilitation Alternative would include rehabilitation of the existing buildings, with demolition of only some interior and exterior components of the buildings, and not the buildings themselves, with no construction of new structures; the only potential (and temporary) noise sources would be a small amount of grading and exterior work, and more extensive rehabilitation activities. The major rehabilitation work would be conducted inside the buildings, which significantly attenuate the noise emitted to the outside. Rehabilitation also uses smaller and less powerful construction equipment, thus generating lower noise emissions than would demolition and new construction. However, Alternative 3 would implement the same mitigation measures as the Project to reduce impacts associated with onsite and offsite construction noise. Therefore, under Alternative 3, short-term noise impacts during the construction phase would be less than significant and less when compared to the significant and unavoidable noise impacts associated with the Project after mitigation.

Operation

Alternative 3 would not develop new uses on the Project Site and would have no significant change in existing site operations. The only minimal change in intensity of use would be generated by the

additional nine currently uninhabitable units that would be rehabilitated under this alternative for a total of 100 habitable units. No significant stationary or mobile noise sources would be introduced to the Project Site or the project vicinity. Therefore, long-term operational noise impacts associated with Alternative 3 would be less than significant and less when compared to the less-than-significant operational noise impacts associated with the Project.

5.7.2.10 Population and Housing

Under the Historic Rehabilitation Alternative, two to three buildings would be rehabilitated at a time, and residents would be temporarily relocated off site. Full relocation assistance would be provided. No existing buildings would be demolished and no new construction would occur. This alternative would have less than significant population and housing impacts because no additional units beyond the current 100 units onsite would be created. There would be a minimal increase in the number of occupied housing units from the existing 91 habitable units to 100 habitable units because this alternative would make all 100 units on the Project Site habitable. Similar to the Project, Alternative 3 would also lead to temporary short-term displacement and relocation of the existing tenants residing on the Project Site while units are rehabilitated. When the residents return to a rehabilitated unit, the households would need to be "right sized" under the new Section 8 occupancy standards and therefore not all residents may be able to return to a right size unit. Those residents would be provided with a portable Section 8 voucher and relocation assistance, which would allow them to move permanently off site, so the impact would be less than significant. Therefore, impacts associated with the displacement of people under this alternative would be less than significant but greater than the less-than-significant impact of the Project.

However, unlike the Project, Alternative 3 would not help the City of Los Angeles meet its affordable housing needs because no additional affordable housing units would be constructed under this alternative. This alternative would not advance local and regional planning objectives that promote the development of new housing to meet affordable housing demand and estimated population projections.

5.7.2.11 Public Services

Fire Protection

<u>Construction</u>

Under the Historic Rehabilitation Alternative, would involve rehabilitation of the existing buildings and demolition of only some interior and exterior components of the buildings, and not the buildings themselves. Rehabilitation construction would be of a smaller scale and shorter duration than the Project. As such, Alternative 3 would have less potential during construction to expose people to the risk of fire or explosion related to the use of hazardous materials or to potentially impact the provision of fire protection services in the vicinity of the Project Site. Thus, potential construction-related fire protection impacts would be less under Alternative 3 when compared to the less-than-significant impacts of the Project.

<u>Operation</u>

There would be no potential to increase the level of activity on the Project Site or increase the service population for the LAFD stations that would serve the Project Site. No long-term impacts to fire

protection and emergency services would occur under Alternative 3, and impacts would be less when compared to the less-than-significant impacts of the Project.

Police Protection

Construction

Under the Historic Rehabilitation Alternative, there is a short-term increased of the potential for construction to create the possibility for trespassing, vandalism, sources of nuisances and hazards, or potentially impact police protection services in the vicinity of the Project Site during rehabilitation. However, rehabilitation construction would be of a smaller scale and shorter duration than the Project and temporary fencing erected during the construction phase would serve to feasibly deter such activities. Alternative 3 would implement the same mitigation measures as the Project to reduce impacts associated with police protection. Thus, potential construction-related police protection impacts would be less under Alternative 3 after mitigation when compared to the Project, which would also be less-than-significant after mitigation.

Operation

There would be a minimal increase in the number of occupied housing units from the existing 91 habitable units to 100 habitable units because this alternative would make all 100 units on the Project Site habitable. There would be a minor increase of the service population and level of activity on the Project Site and thus only a minor increase for the LAPD station that would serve the Project Site. No long-term impacts to police protection services would occur under Alternative 3, and impacts would be less when compared to the less-than-significant impacts of the Project.

Schools

Construction

Under the Historic Rehabilitation Alternative, would involve rehabilitation of the existing buildings and demolition of only some interior and exterior components of the buildings, and not the buildings themselves. Rehabilitation construction would be of a smaller scale and shorter duration than the Project. Alternative 3 would not create the potential for construction employment to result in an increase in the resident population or corresponding demand for schools in the vicinity of the Project Site. Therefore, Alternative 3 would not result in any school impacts due to construction, and impacts would be less when compared to the less-than-significant impacts of the Project.

Operation

Under Alternative 3, there would be a minimal increase in the number of occupied housing units from the existing 91 habitable units to 100 habitable units. As there would be a negligible increase in housing units, there would be an insignificant increase in Project Site residents and therefore, there would be a negligible potential to increase the population of school-aged children in the attendance boundaries of the schools within the LAUSD that serve the Project. Accordingly, no long-term impacts to school services would occur under Alternative 3, and impacts would be less than the Project's less-than-significant impact on school services.

Recreation and Parks

Construction

Under the Historic Rehabilitation Alternative, there would be potential short-term construction impacts (associated with air quality, noise, and traffic) to users of parks and recreation facilities in the project area. Similar to the Project, this alternative may also create access issues or require a traffic plan for parks and recreation facilities in the area. Alternative 3 would implement the same mitigation measure as the Project to reduce impacts associated with recreation and parks during construction. Therefore, temporary construction-related impacts on parks and recreational facilities would be less than significant after mitigation and similar to the Project, which would also be less than significant after mitigation.

Operation

As there would be a minimal increase in the number of occupied housing units from the existing 91 habitable units to 100 habitable units, there would be no significant increase in the use of recreational facilities and open space in the long-term during project operation. Less than significant impacts to parks and recreational facilities would occur under Alternative 3, and impacts would be less than the less-than-significant impacts of the Project.

Libraries

Construction

Under the Historic Rehabilitation Alternative, would involve rehabilitation of the existing buildings and demolition of only some interior and exterior components of the buildings, and not the buildings themselves. Rehabilitation construction would be of a smaller scale and shorter duration than the Project. Alternative 3 would not create the potential for construction employment to result in an increase in the resident population or corresponding demand for libraries in the vicinity of the Project Site. Therefore, Alternative 3 would not result in any library impacts due to construction, and impacts would be less when compared to the less-than-significant impacts of the Project.

Operation

Alternative 3 would not construct new development and lead to a slight increase (nine units) in habitable units on site. Therefore, Alternative 3 would not significantly increase the library service population. However, additional tax revenues from new development at the site (a portion of which goes to fund City library facilities and services) would not be generated. Less than significant impacts to library services would occur under Alternative 3, and impacts would be less when compared to the less-than-significant impacts of the Project.

5.7.2.12 Transportation

Construction

The Historic Rehabilitation Alternative would have construction impacts similar to those of the Project, albeit of lesser magnitude. Rehabilitation construction would be of a smaller scale and shorter duration than the Project. Under this alternative, rehabilitation work during project construction would generate vehicle trips associated with construction equipment, haul trucks, or

construction worker vehicles. Additionally, there would be potential for access and safety, bus/transit, and on-street parking impacts during construction. To the extent necessary, Alternative 3 would implement the same mitigation measures as the Project to reduce potential impacts associated with transportation and traffic. Therefore, construction impacts under Alternative 3 would be less than significant after mitigation. Since rehabilitation construction would be of a smaller scale and shorter duration than the Project, Alternative 3 would have less impacts than the Project, which would be less-than-significant after mitigation.

Operation

Alternative 3 would not develop new or additional land uses on the Project Site. This alternative would increase the number of existing habitable residential units on site from 91 to 100. Therefore, there could be a slight increase in vehicle trips or parking demand or bus/transit ridership, in the project vicinity during project operation. However, given the minimal increase in the number of habitable units, impacts with respect to operational traffic, including intersection levels of service; the regional transportation system; neighborhood intrusion; access and circulation; and bicycle, pedestrian, and vehicular safety would be less than significant. Under this alternative, long-term transportation and traffic impacts during project operation would be less than those of the Project's less-than-significant impacts due to the limited number of habitable units and persons who would be added to the Project Site.

5.7.2.13 Tribal Cultural Resources

The Historically Compliant Rehabilitation Alternative would include no demolition of existing buildings or any new construction. This alternative would include only rehabilitation of existing buildings and landscaping, and the Rose Hill Courts would have no significant change in operations. Therefore, there would be less potential for Alternative 3 to uncover subsurface tribal cultural resources. As such, impacts to tribal cultural resources would be less when compared to the Project, which would be less than significant.

5.7.2.14 Wildfire

Construction

Under the Historic Rehabilitation Alternative, no demolition or new construction would occur at the site. However, this alternative would include extensive rehabilitation work and related construction activities. Similar to new development under the Project, this alternative has the potential to create fire hazards associated with the use or release of potentially flammable materials, or generate flammable waste, or the use and storage of hazardous and flammable materials during construction that could potentially become a fire hazard. However, rehabilitation work uses smaller and less powerful construction equipment compared to demolition and new construction. Therefore, this alternative would have less short-term construction wildfire impacts when compared to the less-than-significant impacts of the Project.

Operation

Under this alternative, there would be a minimal increase in the number of occupied housing units from the existing 91 habitable units to 100 habitable units. Similar to the Project, Alternative 3 would rehabilitate the existing buildings with new features that would be up to code and provide the highest level of fire protection. The rehabilitated buildings would include required fire suppression design

features (i.e., fire-resistant building materials, where appropriate, smoke detection and fire alarm systems, automatic sprinkler systems (in compliance with all applicable City and Fire codes), portable fire extinguishers, and emergency signage in all buildings, and required brush clearance), identified in the latest edition of the California Building Code. Therefore, impacts related to wildfires would be less than significant. This alternative would have less long-term operational wildfire impacts when compared to the less-than-significant impacts of the Project, due to the fewer number of residential units proposed under this alternative.

5.7.2.15 Energy

Energy Use

Construction

The Historic Rehabilitation Alternative would not include demolition of existing buildings or construction of any new buildings. This alternative would only include activities for rehabilitation of existing buildings and landscaping. Rehabilitation construction would be of a smaller scale and shorter duration than that of the Project. Therefore, Alternative 3 would generate a short-term lesser demand for energy during construction, and construction-related impacts to energy would be less than significant. The Historic Rehabilitation Alternative would require a commitment of resources for construction such as building materials, fuel, and the transportation of goods and people to and from the Project Site but on a much smaller scale than the Project. As such, short-term impacts from construction under Alternative 3 would be less when compared to the less-than-significant impacts of the Project.

Operation

Alternative 3 would not alter the existing land uses or site operations on the Project Site. The units would have to meet the latest Title 24 energy standards, however there are provisions for rehabilitation and the Historic Building Code would apply. This alternative would comply with any applicable provisions of the Los Angeles City building code including the Historic Building Code. As there would only be a minimal (nine-unit) increase in housing units under this alternative, there would not be a large increase in the number of Project Site residents. Therefore, there would be no significant increase in operational energy use and long-term impacts associated with increased energy demand under Alternative 3 would be less than significant but less when compared to the less-than-significant long-term operational impacts related to energy demand for the Project.

Infrastructure Capacity

Construction

Rehabilitation construction would be of a smaller scale and shorter duration than that of the Project. Therefore, Alternative 3 would generate a short-term lesser demand for energy during construction that would use existing energy infrastructure capacity. As such, impacts under Alternative 3 would be less when compared to the less-than-significant impacts of the Project.

Operation

The Historic Rehabilitation Alternative would not alter the existing land uses or operations on the Project Site. Alternative 3 would only increase the number of existing habitable residential units on

site from 91 to 100 thus there would only be a minimal increase to long-term energy demand on the Project Site. Therefore, less than significant operational impacts related to energy infrastructure would occur under Alternative 3, and impacts would be less when compared to the less-than-significant impacts of the Project.

5.7.3 Comparison of Alternative to the Proposed Project

The Historic Rehabilitation Alternative would avoid the Project's significant and unavoidable impacts to aesthetics (with respect to historical resources) and historical resources since the rehabilitation of the buildings would be done so as to preserve the historical characteristics of the buildings. Alternative 3 would also reduce the Project's short-term significant and unavoidable impacts of noise to a less-than-significant level during construction. Furthermore, Alternative 3 would have a lesser environmental impact than the Project with regards to air quality, geology and soils and paleontological resources, greenhouse gas emissions, land use and planning, public services, transportation, tribal cultural resources, wildfire, and energy. Impacts associated with the remaining environmental issues would be similar to those of the Project.

5.7.4 Relationship of the Alternative to Project Objectives

Under the Historic Rehabilitation Alternative, none of the objectives would be fully met. Under this alternative, only the following objectives would be partially met:

- To design the project in a manner that maximizes accessibility, energy efficiency and contemporary amenities.
- To provide a site that enhances security and provides for safe and useable open/green space.
- To provide a long-term useful life of buildings to minimize the future need for investment in affordable housing rehabilitation and repairs.

The Historic Rehabilitation Alternative would not meet the following objectives:

- To provide a substantial increase in the number of affordable housing units than exist today at the Project Site, consistent with the goals of HACLA's 25-Year Vision Plan, *Build* HOPE, to expand affordable housing opportunities and increase the permanent affordable housing supply in Los Angeles.
- To maximize the opportunity for existing tenants to return once the project is completed by matching their household size to a "right size" unit.
- To assist the City of Los Angeles in meeting its affordable housing needs and goals.
- To increase and locate onsite parking in closer proximity to the housing units.
- To maximize housing in close proximity to transit and parks.

5.8 Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a project shall identify an Environmentally Superior Alternative among the alternatives evaluated in an EIR.

The CEQA Guidelines also state that should it be determined that the No Project/No Build Alternative is the Environmentally Superior Alternative, the EIR shall identify another Environmentally Superior Alternative among the remaining alternatives.

With respect to identifying an Environmentally Superior Alternative among those analyzed in this Draft EIR, the range of feasible alternatives includes the No Project/No Action Alternative; the Non-Historically Compliant Rehabilitation Alternative; and the Historic Rehabilitation Alternative. **Table 5.4-1** on page 5-6 provides a summary of the description of alternatives and a comparison of the different project components. **Table 5.4-2** on page 5-7 provides a summary comparison, by environmental topic, of the Project impacts and the impacts of each of the alternatives. **Table 5.4-3** on page 5-11 provides a summary comparison of each of the alternatives' ability to meet the goals and objectives of the Project. A more detailed description of the potential impacts associated with each alternative is provided above. Pursuant to § 15126.6(c) of the CEQA Guidelines, the analysis below addresses the ability of the alternatives to "avoid or substantially lessen one or more of the significant effects" of the Project.

Of the alternatives analyzed in this Draft EIR, Alternative 1, the No Project/No Action Alternative would avoid all of the Project's significant environmental impacts, including the Project's significant and unavoidable impacts related to aesthetics (historical resources) and historical resources due to demolition of existing historical buildings onsite; and short-term significant and unavoidable noise impacts during construction. Although Alternative 1 would reduce most of the Project's less-than-significant and less-than-significant-with-mitigation impacts, it would not address and mitigate the existing hazardous materials onsite such as ACMs, LBPs, lead in the drinking water due to lead in the pipes, the deteriorating termite-infested wood in the existing buildings, or the existing nine uninhabitable units. Furthermore, the No Project/No Action Alternative would not meet any of the Project's basic objectives.

In accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than the No Project/No Build Alternative, a comparative evaluation of the remaining alternatives indicates that Alternative 3, the Historic Rehabilitation Alternative, would be the Environmentally Superior Alternative. As discussed above, while Alternative 3 would not completely eliminate the Project's impacts that would be significant and unavoidable, given the reduction in construction activities, equipment, and duration, Alternative 3 would eliminate the Project's significant and unavoidable impacts to aesthetics and cultural resources (with respect to historical resources) since the rehabilitation of the buildings would be done so as to preserve the historical characteristics of the buildings. Alternative 3 would also reduce the Project's short-term significant and unavoidable impacts of noise to a less-than-significant level during construction. Alternative 3 would also reduce many of the Project's less-than-significant impacts compared to the other alternatives. Thus, of the range of alternatives analyzed, Alternative 3 would be the Environmentally Superior Alternative.

However, as discussed in Section 5.7.4 above, under Alternative 3, none of the Project objectives would be fully met, only three of the eight objectives would be partially met, and five of the eight Project's objectives would not be met at all. Alternative 3 would not be able to provide the region-wide economic, legal, social, technological, or other benefits to the low-income population that the objectives of the Project would provide. Therefore, even though Alternative 3 is the Environmentally Superior Alternative, it would not provide the greatest benefits to the low-income population that HACLA is mandated to serve.

SECTION 6.0 – OTHER CEQA CONSIDERATIONS

6.0 OTHER CEQA CONSIDERATIONS

6.1 Significant Unavoidable Impacts

This section includes a description of the significant and unavoidable impacts of the proposed Project. Section 15126.2(b) of the State CEQA Guidelines requires that the EIR describe any significant impacts, including those that can be mitigated but not reduced to less-than-significant levels. Section 15126.2(b) of the State CEQA Guidelines is written as follows:

> *Significant Environmental Effects Which Cannot Be Avoided if the Proposed Project is Implemented. Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.*

Potential environmental effects of the Project and proposed mitigation measures are discussed in **Sections 4.1** through **4.15** of this document. This EIR determined that there would be unavoidable significant adverse impacts on aesthetics (**Section 4.1**) and cultural resources, as discussed in the Cultural Resources Section (**Section 4.4**) of this document. The significant unavoidable impacts to aesthetics and cultural resources are due to demolition of the CRHR-listed existing Rose Hill Courts historic buildings. There would also be unavoidable significant adverse impacts to noise (**Section 4.9**) during the temporary construction phase of the Project due to onsite construction activities. After implementation of mitigation measures, the proposed Project would still have significant environment effects, which would necessitate the adoption of a Statement of Overriding Considerations for impacts regarding aesthetics, cultural (historic buildings) resources, and noise during Project construction. Furthermore, as evaluated in **Section 4.0**, Environmental Impact Analysis, of this Draft EIR, cumulative impacts to aesthetics and cultural resources (due to the demolition of the historic Rose Hill Courts buildings on the Project Site) would be significant and unavoidable.

As discussed in Section 5.0, CEQA Guidelines § 15043 states that a public agency may approve a project even though the project would cause a significant effect on the environment if the agency makes a fully informed and publicly disclosed decision that:

(a) There is no feasible way to lessen or avoid the significant effect (see CEQA Guidelines § 15091); and

(b) Specifically identified expected benefits from the project outweigh the policy of reducing or avoiding significant environmental impacts of the project (see CEQA Guidelines §15093).

As stated in CEQA Guidelines § 15093(a):

> *CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."*

6.1.1 Aesthetics

As discussed in **Section 4.1**, Aesthetics, Rose Hill Courts originated as a public housing complex developed by HACLA in 1942. The complex was formally determined eligible for listing in the National Register of Historic Places (NRHP) as a historic district in 2003 through the federal review process under Section 106 of the National Historic Preservation Act. As such, it was automatically listed in the California Register of Historical Resources (CRHR). Properties that are listed in the CRHR are defined by CEQA as historic resources. The history of Rose Hill Courts is discussed in further detail in **Section 3.0**, Environmental Setting, and **Section 4.4**, Cultural Resources. Since the existing Rose Hill Courts complex is listed in the CRHR because the buildings are historic, the historic building complex is therefore considered to be a scenic resource.

The proposed demolition of the existing buildings would substantially damage a scenic resource, which would be considered a significant impact. As discussed in **Section 4.4**, Cultural Resources, in this DEIR, in most circumstances, the demolition of a historical resource cannot be mitigated to a less than significant level. Therefore, the Project would have a significant adverse impact to the historical buildings on the Project Site and thus would have a significant and unavoidable adverse impact to a scenic resource.

However, as discussed in **Section 4.4**, HACLA will implement mitigation measures **CUL-1** and **CUL-2** to comply with CEQA regarding historic cultural resources. However, the mitigation measures would not reduce potentially significant impacts on built environment resources to a less than significant level. Therefore, impacts to the historic buildings and to aesthetics would remain significant and unavoidable after mitigation.

With regard to cumulative impacts as discussed in **Section 4.1.4**, although there are no known related projects involving historical resources within a similar context or property type as Rose Hill Courts, it is reasonably foreseeable that HACLA could redevelop, partially redevelop, or significantly rehabilitate other public housing complexes in the future. If the other foreseeable public housing projects are historical resources, the Project could potentially contribute to cumulative impacts on historical resources (GPA Consulting, 2018, p. 1). Therefore, cumulative impacts to aesthetics (due to the loss of the historical resources) would be significant and would be cumulatively considerable.

6.1.2 Cultural (Historic Architectural) Resources

As discussed in **Section 4.4**, Cultural Resources, of this Draft EIR, the Project would involve the demolition of the existing Rose Hill Courts public housing complex. Rose Hill Courts is a historical resource because it was formally determined eligible for listing in the NRHP and therefore, was automatically listed in the CRHR. The significance of Rose Hill Courts would be materially impaired by the Project because it would no longer be listed in the CRHR or eligible for listing in the NRHP if it were demolished. As discussed in **Section 4.4**, Cultural Resources (specifically **Section 4.4.4**, Analysis of Project Impacts) in this DEIR, in most circumstances, the demolition of a historical resource cannot be mitigated to a less than significant level.

Nonetheless, as discussed in **Section 4.4**, HACLA will implement mitigation measures **CUL-1** and **CUL-2** to comply with CEQA regarding historic cultural resources. The Project Applicant will have a qualified professional architectural historian prepare an interpretive display to be installed in the new community building on the redeveloped Rose Hill Courts Project Site. The display will include a brief history of the historic property, its significance in the contexts of public and defense worker housing in Los Angeles during the Second World War and public housing design related to the Garden

City and Modern movements, and a description of the Project which led to the demolition of the historic property. The display will be reviewed and approved by SHPO before it is produced and installed. HACLA will also add to its existing website a section dedicated to the history of HACLA and public housing in Los Angeles within six (6) months of completing the Rose Hill Courts Redevelopment Project. The website will provide content on the history of the agency, the significance of public housing in the City, and notable examples of public housing architecture and site planning.

However, these mitigation measures would not reduce potentially significant impacts on built environment resources to a less than significant level. Therefore, even after implementation of mitigation measures **CUL-1** and **CUL-2**, impacts on historical resources would remain significant and unavoidable. As discussed in **Section 4.4**, GPA Consulting (2018:1) concluded that the proposed Project when considered with other potential projects would have a significant cumulative impact on historical resources. Although, there are no known related projects involving historical resources within a similar context or property type as Rose Hill Courts, it is reasonably foreseeable that HACLA could redevelop, partially redevelop, or significantly rehabilitate other public housing complexes in the future. If the other foreseeable public housing projects are historical resources, the Project could potentially contribute to cumulative impacts on historical resources (GPA Consulting, 2018, p. 1). Therefore, cumulative impacts associated with historical resources would be cumulatively considerable.

6.1.3 Noise

As discussed in **Section 4.9** of this Draft EIR, the use of heavy equipment during construction would result in short-term increases in exposures of nearby sensitive receivers. The increase over ambient levels would exceed the significance threshold at all receptors for both phases of Project construction. Implementation of mitigation measures **N-1** through **N-5** (**Section 4.9.5**) would result in an appreciable decrease in exposures, but these short-term exposures would still be significant sometimes during construction. Therefore, Project impacts related to increased noise levels during construction would besignficant and unavoidable after mitigation.

The construction contractor will conduct noise monitoring near sensitive receivers identified for this Project, during the suspected noise producing construction activities. If the monitored noise levels exceed background (ambient) noise levels by 5 dBA or more, then the construction contractor will mitigate noise levels using temporary noise shields, noise barriers or other mitigation measures to comply with those restrictions or standards. These may include the use of portable noise barriers, including solid structures and noise blankets, between the active noise sources and the nearest noise receivers. Installation of the temporary sound barriers provided in the mitigation measures would reduce the noise generated by onsite construction activities but they may not reduce the impacts to less than significant levels at all times. There are no other feasible mitigation measures that could be implemented to reduce the temporary noise impacts from onsite construction to sensitive receptors. As such, construction noise impacts associated with onsite noise sources would remain significant and unavoidable.

With regard to cumulative impacts, as discussed in **Section 4.9.4**, cumulative construction impacts could occur if other construction projects were active concurrently with development of the proposed Project, and near enough so that noise from two or more projects were perceived by the same sensitive receivers. However, the area surrounding the Project Site is almost completely built out, and there is limited space for new development. Currently, there are no planned or reasonably

foreseeable future projects that could generate additional construction noise in the immediate Project vicinity. Therefore, cumulative construction noise impacts would be less than significant.

6.2 Reasons Why the Project is Being Proposed, Notwithstanding Significant Unavoidable Impacts

In addition to identification of a Project's significant unavoidable impacts, Section 15126.2(c) of the CEQA Guidelines requires that an EIR describe the reasons why a project is being proposed, notwithstanding the effects of the identified significant and unavoidable impacts. The reasons why the proposed Project has been proposed are included in **Section 1.0** and **Section 2.0**, of this Draft EIR and are further described below. The underlying purpose and objectives of the Project are closely tied to the City's need to provide additional affordable housing and to the objectives of the Northeast Los Angeles Community Plan, which supports the objectives and policies of applicable larger-scale regional and local land use plans, including SCAG's 2016-2040 Regional Transportation Plan/Sustainability Communities Strategy (2016-2040 RTP/SCS) and the City's General Plan.

The purpose of the Rose Hill Courts Redevelopment Project is to replace the 100 aging public housing units at the Rose Hill Courts complex with 185 new housing units on the Project Site (183 restricted affordable plus 2 unrestricted manager's units). The proposed Project would not only provide new housing for residents who currently reside at Rose Hill Courts but would also provide an additional 83 units of new affordable housing to those in need. As provided in **Section 1.0** and **Section 2.0** of this Draft EIR, the objectives of the Project are to:

1. Provide a substantial increase in the number of affordable housing units than exist today at the Project Site, consistent with the goals of HACLA's 25-Year Vision Plan, Build HOPE, to expand affordable housing opportunities and increase the permanent affordable housing supply in Los Angeles.

2. Maximize the opportunity for existing tenants to return once the Project is completed by matching their household size to a "right size" unit.

3. Assist the City of Los Angeles in meeting its affordable housing needs and goals.

4. Design the Project in a manner that maximizes accessibility, energy efficiency and contemporary amenities.

5. Provide a site that enhances security and provides for safe and useable open/green space.

6. Increase and locate onsite parking in closer proximity to the housing units.

7. Provide a long-term useful life of buildings to minimize the future need for investment in affordable housing rehabilitation and repairs.

8. Maximize housing in close proximity to transit and parks.

The underlying purpose and objectives of the Project supports the objectives and goals of the Northeast Los Angeles Community Plan; to provide a safe, secure, and attractive residential environment for all economic, age, and ethnic segments of the community; to promote and ensure the provision of fair and equal housing opportunities for all persons regardless of income and age

groups or ethnic, religious, or racial background; and to ensure that redevelopment activity minimizes displacement of residents. The proposed Project would support the Northeast Los Angeles Community Plan's objectives by providing more affordable housing that will be safer and more attractive with updated outdoor space and amenities. The Project's proposed Relocation Plan would ensure displacement of residents is minimized.

The underlying purpose and objectives of the Project support the goals identified in the City's General Plan Housing Element: to provide an adequate supply of affordable housing that is safe, healthy, sanitary, and affordable to people of all income levels, races, ages, and suitable for their various needs; housing that helps to create safe, livable and sustainable neighborhoods; housing opportunities for all without discrimination; and to end and prevent homelessness. The Project would be consistent with the policies in the City's General Plan Housing Element by providing more affordable housing. The proposed Project would demolish the existing buildings and remediate the existing hazardous materials onsite and provide additional safer and healthier affordable housing that is sustainable and livable. Furthermore, as detailed in **Section 4.8**, Land Use and Planning, of this Draft EIR, the Project design would respect the scale and character of the existing surrounding uses in accordance with the objectives of the City's Housing Element.

The 2016-2040 RTP/SCS places emphasis on sustainability and integrated planning, and identifies mobility, accessibility, sustainability and high quality of life, as the principals most critical to the future of the region. The RTP/SCS balances the region's future mobility and housing needs with economic, environmental and public health goals. The SCAG RTP/SCS states that affordable housing needs (which is determined by SCAG's RHNA) have not been met in the SCAG region. As of December 2018, the City of Los Angeles has not currently met their RHNA goals, as detailed in data provided by HCD, the City of Los Angeles is listed as a city that is subject to Senate Bill 35.

The Project would also support SCAG's goal to provide sustainable communities by creating an environmentally sensitive development. Specifically, the Project would incorporate sustainable and green building design and construction strategies, including energy-efficient buildings, and water conservation and waste reduction measures as described in **Section 2.0**, Project Description. The Project would incorporate the use of environmentally friendly materials, such as non-toxic paints and recycled finish materials wherever possible. The Project would include the use of LED lighting, use of drought-tolerant plants, use of high-efficiency toilets and shower heads, water-efficient irrigation, and energy efficient appliances and lighting. Furthermore, the Project's onsite improvements would include Low Impact Development/Standard Urban Mitigation Plan BMPs for "store & re-use" to retain and treat site runoff during storm events.

Based on the analysis provided above, the proposed Project reflects a development that is consistent with the overall vision of the City and SCAG to create sustainable communities and enhance quality of life throughout the City and the region and to create additional much-needed affordable housing to meet the City's affordable housing goals. Therefore, the benefits of the proposed Project would outweigh significant and unavoidable impacts of the Project. Additionally, as discussed in the Alternatives section of this document, although the No Project/No Action Alternative would avoid the proposed Project's significant and unavoidable impacts, it would result in more impacts with regards to hazards/hazardous materials; public health and safety; and wildfire. Additionally, the No Project/No Action Alternative would not achieve any of the Project's objectives.

6.3 Significant Irreversible Environmental Changes

Section 15126.2(d) of the State CEQA Guidelines requires that an EIR discuss "any significant irreversible environmental changes which would be involved in the proposed action should it be implemented." It defines an irreversible impact as an impact that uses nonrenewable resources during the initial and continued phases of the Project. Irreversible impacts can also result from damage caused by environmental accidents associated with the Project. Irretrievable commitments of resources should be evaluated to assure that such consumption is justified. Section 15126.2(d) of the State CEQA Guidelines is written as follows:

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

Construction and implementation of the proposed Project would involve the commitment of building materials, human resources (labor) and energy, commensurate with that of other projects of similar nature and magnitude. Construction of the Project would require use of water, timber, steel, sand, gravel and other minerals and natural resources. Although this is not an unusual demand for these resources, it nonetheless is an incremental increase in demand for nonrenewable resources. Labor would also be committed to the construction of the proposed 185-unit housing Project with associated onsite parking and landscaping. Nonrenewable energy resources would be used during construction and subsequent operation of the Project. This commitment of energy resources would be a long-term obligation, as, once the Project Site has been developed, it is highly unlikely that the land could be returned to its original condition. However, as discussed in **Section 4.15**, Energy, of this document regarding energy conservation, impacts resulting from increased energy usage would be considered less than significant.

6.3.1 Building Materials and Solid Waste

Construction of the Project would require the use of resources that may be considered non-renewable or not quickly replenished. These resources would include lumber and other forest products, aggregate materials used in concrete and asphalt (e.g., sand, gravel and stone), metals (e.g., steel, copper and lead), and petrochemical construction materials (e.g., plastics). As discussed in **Section 2.0**, Project Description, the Project would use a variety of building materials, including stucco, and composite siding. the new buildings would be designed and constructed to incorporate environmentally-sustainable design features under Build It Green's "GreenPoint Rated" system. "Green" principles would be incorporated throughout the Project to comply with the City of Los Angeles Green Building Code (Ordinance No. 184,692). The Project would also utilize sustainable planning and building strategies and would incorporate the use of environmentally-friendly materials, such as non-toxic paints and recycled finish materials wherever possible. Thus, the consumption of non-renewable building materials such as lumber, aggregate materials, and plastics would be reduced.

As discussed in **Section 4.2**, Air Quality, Project construction activities for both phases would include remediation of lead and asbestos, followed by demolition of the existing buildings onsite prior to

construction of the new buildings. As discussed in Section 4.18 (Utilities and Service Systems), of the Initial Study included in **Appendix B**, materials generated during construction of the Project could include paper, cardboard, metal, plastics, glass, concrete, lumber scraps and other materials. Non-hazardous recyclable debris would be salvaged for diversion from landfills. All construction waste with potentially hazardous materials such as asbestos, lead and contaminated soils would be disposed of in a Class I (hazardous waste) landfill in accordance with all applicable requirements and laws. The Project would have a less than significant impact to landfills because the Project would be required to comply with the City of Los Angeles Citywide Construction and Demolition (C and D) Waste Recycling Ordinance, which was passed on March 5, 2010.

6.3.2 Water

Construction of the proposed Project would require the typical use of water for activities such as dust control. Water for construction activities would be conveyed using the existing water infrastructure at the Project Site, and no major offsite infrastructure improvements would be needed for construction activities. However, the Project includes the development of water lines to provide an adequate water flow to the Project Site for water service and fire suppression needs during Project operation. Use of water during construction would be temporary and amounts needed for dust control would be considered de minimis.

Additionally, as concluded in the Los Angeles Department of Water and Power (LADWP)'s 2015 Urban Water Management Plan (UWMP), projected water demand for the City would be met by the available supplies during an average year, single-dry year, and multiple-dry year in each year from 2015 through 2040. Project construction is anticipated to be completed by 2024. Therefore, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of Project construction.

Consumption of water during operation of the Project is addressed in Section 4.18, Utilities and Service Systems, of the Initial Study included in **Appendix B**. The UWMP for the City of Los Angeles includes a water demand forecast, with passive conservation savings from codes, ordinances, and conservation phases for the LADWP service area. As detailed in the UWMP, for the year 2025, multi-family housing would have an estimated water demand of 206,065 AFY (Los Angeles Department of Water & Power UWMP, 2015, p. ES-11). The Project’s maximum net increase in water demand of 14,833 gpd (16.62 AFY) is approximately .008 percent of the UWMP’s projected demand for multi-family housing at Project buildout (2024). Therefore, the Project would comprise a de minimis demand compared to the anticipated demand from multifamily housing. Additionally, the LADWP issued a water availability will-serve letter stating that the Project Site can be supplied with water from the municipal system subject to the Water System rules of the LADWP. Therefore, the LADWP would provide water to meet the needs of the Project.

The Project would comply with applicable requirements of the City of Los Angeles Department of Public Works and the LAFD such that the Project would provide adequate infrastructure and water flow to the Project Site. Since there are sufficient water supplies available and the Project does not result in an increase in water demand above that projected in UWMP, Project implementation would not require construction of new water treatment facilities nor expanded entitlements to water supplies. Therefore, less than significant impacts are anticipated.

Thus, as evaluated in Section 4.18, Utilities and Service Systems, of the Initial Study included in **Appendix B**, while Project construction and operation would result in some irreversible consumption of water, the Project would not result in a significant impact related to water supply.

6.3.3 Energy Consumption

During construction of the Project, non-renewable fossil fuels would represent the primary energy source, and thus the existing finite supplies of these resources would be incrementally reduced. Fossil fuels, such as diesel, gasoline, and oil, would also be consumed in the use of construction vehicles and equipment. Project consumption of non-renewable fossil fuels for energy use during construction and operation of the Project is addressed in **Section 4.15**, Energy, of this Draft EIR. As discussed therein, construction activities for the Project would not require the consumption of natural gas, but would require the use of electricity and fossil fuels. As the consumption of fossil fuels would occur on a temporary basis during construction, impacts related to the consumption of fossil fuels during construction of the Project would be less than significant.

During operation, the Project's increase in electricity and natural gas demand would be within the anticipated service capabilities of LADWP and the Southern California Gas Company, respectively. As discussed in **Section 4.15,** Energy, of this Draft EIR, the Project would implement various Project design features to reduce electricity consumption. Consistent with regulatory requirements, the Project would comply with applicable provisions of the 2017 Los Angeles Green Building Code that in turn requires compliance with mandatory standards included in the California Green Building Standards. The 2016 Title 24 standards are 28 percent more efficient (for electricity) than residential construction built to the 2013 Title 24 standards and 5 percent more efficient (for electricity) for non-residential construction. The 2016 Title 24 standards are more efficient than the 2020 Projected Emissions under Business-as-Usual in the Climate Action Scoping Plan. The standards offer builders better windows, insulation, lighting, ventilation systems and other features that reduce energy consumption in homes and businesses. Thus, the Project has incorporated energy efficiency standards as project design features (PDFs) that are consistent with the measures identified in the Climate Action Scoping Plan to reduce GHG emissions. See also **Section 4.6**, Greenhouse Gas Emissions, of this Draft EIR.

In addition, as discussed in **Section 2.0**, Project Description, of this Draft EIR, the Project would incorporate energy-efficient design methods and technologies, when feasible, such as high performance window glazing; passive energy efficiency strategies, such as facade shading, roof overhangs, porches, and inner courtyards; high-efficiency domestic heaters; and enhanced insulation to minimize solar heat gain. Therefore, the Project would not cause the wasteful, inefficient, and unnecessary consumption of electricity during operation.

With regard to natural gas, Project Design Feature **GHG-PDF-12** included in **Section 4.6**, Greenhouse Gas Emissions, of this Draft EIR, would prohibit the installation and use of natural gas-fueled fireplaces in the proposed residential units. Additionally, as discussed above, the Project would be designed and constructed to incorporate environmentally sustainable design features, including energy efficient heating and appliances. Therefore, the Project would not cause the wasteful, inefficient, and unnecessary consumption of natural gas during operation.

With regard to transportation fuel, Project characteristics, such as increasing density, would potentially reduce vehicle miles traveled. See **Section 4.12**, Transportation, of this DEIR. In addition, the Project Site is located in an area well-served by public transit provided by Metro. Specifically, the Project Site is currently served by five Los Angeles Metro Line bus routes (Metro Lines 78, 79, 252, 256, and 378). Los Angeles Metro Line 252 bus stops at the edge of the Project Site. In addition, the Project would encourage and promote bicycle use through the provision of bicycle parking and storage. As discussed in **Section 2.0**, Project Description, of this Draft EIR, bicycle storage areas would be included in the basement level of Building A. In accordance with the requirements of the

LAMC approximately 137 bicycle parking spaces (Phase I: 60 long-term spaces and six short term; Phase II: 64 long-term spaces and seven short term) would be provided for the proposed residential uses. Additionally, the Project Site was designed to encourage walkability in the Project vicinity. The proposed buildings would be organized around an outdoor green space that would run east-west through the center of the Project Site. The green space would extend to the proposed Management Office/Community Building along the eastern portion of the Project Site, which serves as the central gathering space for the residents. Pathways onsite connect each group of buildings to the central green space and to the Management Office/Community Building. New pedestrian access points would be created throughout the Project Site via pedestrian walkways connecting to the interior central green space between the individual buildings. The central green space of the site is connected to Rose Hill Park to the north via a pedestrian walkway between Buildings A and B. Buildings C and D can access Ernest E. Debs Regional Park directly from their main entry walkways located off of Boundary Avenue. All buildings either connect directly to perimeter streets, or, in the case of Buildings E and F, through walkways connecting south to Mercury Avenue to provide a pedestrian-friendly environment.

Therefore, based on the above, the Project would not cause the wasteful, inefficient, and unnecessary consumption of energy and would be consistent with the intent of Appendix F to the CEQA Guidelines. In addition, Project operations would not conflict with adopted energy conservation plans. Refer to **Section 4.15**, Energy, of this Draft EIR, for further analysis regarding the Project's consumption of energy resources.

6.3.4 Environmental Hazards

The Project's potential use of hazardous materials is evaluated in **Section 4.7**, Hazards and Hazardous Materials, of this Draft EIR. As discussed therein, construction and operation of the Project would involve transport, storage, and use of chemical agents, solvents, paints, and other hazardous materials. Chemical transport, storage, and use would comply with RCRA, CERCLA, OSHA, California hazardous waste control law,[96] Division of OSHA, SCAQMD, Los Angeles County Department of Public Health and LAFD requirements. Construction, onsite maintenance, and operation of the Project would involve storage and use of small amounts of commercially-available janitorial and landscaping supplies, typical of those materials used in residential uses. The use, handling, and storage of these materials could increase the potential for hazardous materials releases and, subsequently, the exposure of people and the environment to hazardous materials. However, all potentially hazardous materials are of the type commonly used in households would be used and stored in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. In addition, the Project would be in full compliance with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials. Therefore, it is not expected that the Project would cause irreversible damage from environmental accidents associated with the use of typical, potentially hazardous materials.

6.3.5 Conclusion

Based on **Sections 6.3.1** through **6.3.4** above, construction and operation of the Project would require an irretrievable commitment of resources that are limited, slowly renewable, or non-renewable, and consequently limit the availability of these resources, including the Project Site, for other uses or for future generations. However, the consumption of these resources for the Project would not be considered substantial and would be consistent with regional and local growth

96 Codified in California Health and Safety Code, Division 20, Chapter 6.5, Hazardous Waste Control.

forecasts and development goals for the area. These resources would not be used in a wasteful manner and would not be depleted much quicker than existing conditions. Therefore, although the Project would result in irreversible environmental changes, those changes would be less than significant. Considering that the Project would consume an inconsequential amount of natural resources, and it is replacing an existing urban use on a redevelopment site, the limited use of nonrenewable resources is considered justified.

6.4 Growth-Inducing Impacts

In compliance with CEQA regulations, this section discusses the growth-inducing impacts of a project. CEQA Guidelines § 15126.2(d) requires a discussion of potential growth-inducing impacts of a project. Growth-inducing impacts are defined by CEQA as the ways in which a project could directly or indirectly foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth. In addition, as discussed in the CEQA Guidelines, increases in the population may tax existing community service facilities, thus requiring construction of new facilities that could cause significant environmental effects. It must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment.

6.4.1 Population and Housing

As discussed in **Section 2.0** of this EIR, the Project proposes development of 183 affordable multi-family units and two market rate manager's units. The Project would generate 286 permanent residents in the first phase of development and 380 permanent residents in the second phase of development, resulting in a total of 656 residents, which is 435 more residents, compared to current (January 2019) conditions. Each phase will have one unrestricted (not affordable) manager's unit.

Population growth in the City of Los Angeles is expected to increase by over 140,000 persons by the end of the Housing Element Update planning period in 2021, with an expected population of 3,965,433 persons by September 30, 2021. The population of the City of Los Angeles is expected to grow to 4,320,600 persons by 2035 (City of Los Angeles Department of City Planning, 2013, p. 1-4). The Project's estimated 435 residents represent approximately 0.30 percent of the City's anticipated growth by 2021. Therefore, the Project would not induce substantial growth in the City that was not anticipated in the City's General Plan.

As detailed in the 2016–2040 RTP/SCS, the forecasted population for the City of Los Angeles Subregion in 2016 is approximately 3,954,629 persons[97] (SCAG, 2016). In 2022, the Subregion is anticipated to have a population of approximately 4,118,321 persons[98] (SCAG, 2016). The 435 estimated new residents generated by the Project would represent approximately 0.25 percent of the population growth forecasted by SCAG in the Subregion between 2016 and 2022. The number of new residents generated by the Project would be well within SCAG's population projections in the 2016–2040 RTP/SCS for the Subregion. Therefore, the Project would not result in a significant direct growth-inducing impact.

With regard to housing, as discussed in **Section 4.10**, Population and Housing, the number of households in the City of Los Angeles is anticipated to grow by approximately 364,800 compared to 2012 conditions, which equates to an increase of over 27 percent by the year 2040. The 85 new

97 Based on a linear interpolation of 2012-2040 data.
98 Ibid.

housing units created by the Project would represent approximately 0.023 percent of the household growth forecasted in the City of Los Angeles by 2040. Additionally, as of December 2018, the City of Los Angeles has not currently met their RHNA goals. Therefore, Project-related household growth would be consistent with estimated growth in the region. Accordingly, the Project would not cause housing growth to exceed projected/planned levels for the Project's buildout year.

6.4.2 Employment

In addition to the residential population generated by the Project, the Project would have the potential to generate indirect population growth in the vicinity of the Project Site as a result of the temporary construction employment opportunities generated by the Project as well as employment opportunities generated upon Project completion.

The Project would create temporary construction-related jobs. Due to the specialized nature and expertise of their work, construction workers remain at a job site for the time during which their specific skills are utilized to complete a particular phase of Project construction. Construction workers are not anticipated to relocate to the Project vicinity due to their temporary work on the construction of the Project. Therefore, construction of the Project would not be considered growth-inducing from a short-term employment perspective.

The proposed residential Project is anticipated to generate four employees who will perform property management and maintenance activities. The small number of employees anticipated to be employed by the Project would result in a de minimis impact on regional employment levels. Given that some of the Project's employment opportunities could be filled by people already residing in the Project area, the potential growth associated with employees of the Project who may relocate their place of residence would be less than significant. Although it is possible that some of the employment opportunities could be filled by persons moving from outside of the Project area, no new housing would need to be built to meet the employment demands of the Project. Consequently, the Project would be unlikely to create an indirect demand for additional housing or households in the area. The Project would have a less than significant impact in this regard.

6.4.3 Utility Infrastructure Improvements

The existing Project Site contains infrastructure such as water, sewer, gas, and electrical service to the existing 100 affordable housing units located onsite. The Project involves the development of 185 housing units, which equates to an 85-unit increase compared to existing conditions. The population on the Project Site is anticipated to increase by approximately 435 persons. It is anticipated that some utility improvements for water, sewer, gas, and electricity would need to occur in existing street rights-of-way.

The Project would not introduce unplanned infrastructure not previously evaluated in the adopted Northeast Los Angeles Community Plan, which applies to the Project Site. The Northeast Los Angeles Community Plan contains policies and goals related to increasing the amount of housing in the planning area through Objective 1-6, which states: To promote and ensure the provision of fair and equal housing opportunities for all persons regardless of income and age groups or ethnic, religious, or racial background. One of the residential opportunities identified in the plan is: Identification of areas most suitable for multiple-family development based on adequacy of infrastructure; services, especially schools; and employment, as well as neighborhood character. The Project would provide adequate infrastructure and plans would be reviewed by the City of Los Angeles Public Works Department to ensure that adequate infrastructure would be provided to the Project Site.

The area surrounding the Project Site is currently developed with various land uses including single family and multi-family residential units as well as a school and recreation center. Therefore, the Project would not remove impediments to growth. The Project is located within an urban area that is served by existing utilities and infrastructure. It is anticipated that the Project would require minor local infrastructure upgrades to water, sewer, electricity, and natural gas lines onsite. These improvements may need to occur both on the Project Site as well as in the existing street rights-of-way. Improvements would be limited to serving the utility demands of the Project and would not result in significant or major local or regional utility infrastructure improvements that have not otherwise been previously established on a regional level.

6.4.4 Conclusion

The Project would be consistent with the growth forecast for the City of Los Angeles Subregion and would be consistent with regional policies to efficiently utilize existing infrastructure and land, reduce regional congestion, and improve air quality through the reduction of vehicle miles traveled. The Project would not result in major roadway improvements and involves infill development, making use of existing land. Therefore, direct and indirect growth-inducing impacts of the Project would be less than significant.

6.5 Potential Secondary Effects of Mitigation Measures

Section 15126.4(a)(1)(D) of the CEQA Guidelines states that "if a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure shall be discussed, but in less detail, than the significant effects of the project as proposed." The following provides a discussion of the potential secondary impacts that could occur as a result of the implementation of proposed mitigation measures for each environmental issue area included in this EIR. Environmental issue areas with no impacts or with impacts less than significant and requiring no mitigation would have no potential secondary impacts associated with implementation of mitigation measures and therefore, are not discussed further in this section. The areas in this EIR requiring mitigation are:

- Aesthetics
- Biological Resources
- Cultural Resources
- Public Services – Police Protection
- Transportation
- Geology and Soils/Paleontological Resources
- Hazards and Hazardous Materials
- Noise
- Public Services – Recreation and Parks

The mitigation measures will be implemented by the developer, HACLA, or other agencies such as the City of Los Angeles, as required during different phases of the Project.

6.5.1 Aesthetics

As discussed in **Section 6.1.1** above, since the existing Rose Hill Courts complex is listed in the CRHR because the buildings are historic, the historic building complex is therefore considered to be a scenic resource. The proposed demolition of the existing buildings would substantially damage a scenic resource, which would be considered a significant impact. Mitigation measures **CUL-1** and **CUL-2** are included in **Section 4.4**, Cultural Resources, of this Draft EIR, to reduce the Project's potential impacts to the historic resource. These mitigation measures are discussed further in **Section 6.5.2** below. Implementation of these mitigation measures would not result in adverse secondary impacts.

6.5.2 Cultural Resources

Mitigation measures **CUL-1** and **CUL-2** are included in **Section 4.4**, Cultural Resources, of this Draft EIR, to reduce the Project's potential impacts to cultural (historic architectural) resources. Specifically, mitigation measure **CUL-1** would require the Project Applicant to prepare an interpretive display and install it in the new community building on the redeveloped Rose Hill Courts property. The display will include a brief history of the historic property, its significance in the contexts of public and defense worker housing in Los Angeles during the Second World War and public housing design related to the Garden City and Modern movements, and a description of the Undertaking which led to the demolition of the historic property. The display will be reviewed and approved by SHPO before it is produced and installed. Mitigation measure **CUL-2** requires HACLA to add to its existing website a section dedicated to the history of HACLA and public housing in Los Angeles within six (6) months of completing the Rose Hill Courts Redevelopment Project. The website will provide content on the history of the agency, the significance of public housing in the City, and notable examples of public housing architecture and site planning.

Implementation of these mitigation measures would ensure that the historic resources on the Project Site are thoroughly documented to provide comprehensive information on the historical, architectural, technological, or cultural significance of a building, site, structure, object or landscape and to serve as a permanent record of the growth and development of the City's built environment. The significance of Rose Hill Courts would be materially impaired by the Project because it would no longer be listed in the CRHR or eligible for listing in the NRHP if it were demolished. The mitigation measures would not reduce significant impacts on built environment resources to a less than significant level. However, implementation of these mitigation measures would not result in adverse secondary impacts.

6.5.3 Biological Resources

Mitigation measures **BR-1** and **BR-2** are included in **Section 4.3**, Biological Resources, of this Draft EIR, to reduce the Project's potential impacts to biological resources during construction. Specifically, mitigation measure **BR-1** requires a preconstruction survey to be conducted for special-status species including nesting birds if Project activities begin during nesting bird season. Mitigation measure **BR-2** requires a biological monitor to be present onsite during construction activities if special-status wildlife species or protected nesting birds are observed and determined present within the Project Site during the pre-construction breeding bird surveys. Additional measures listed in mitigation measure **BR-1** and **BR-2** would avoid or minimize direct and indirect effects on migratory non-game nesting birds, and their nests, young, and eggs pursuant the Migratory Bird Treaty Act and California Fish and Game Code. Implementation of these mitigation measures would ensure that special-status wildlife species or protected nesting birds are not impacted during construction activities. Therefore, implementation of these mitigation measures would not result in adverse secondary impacts.

6.5.4 Geology and Soils

Mitigation measure **GEO-1** is included in **Section 4.5**, Geology and Soils, of this Draft EIR, to minimize the potential impacts associated with geology and soils. Mitigation measure **GEO-1** requires a final design-level geotechnical report to be prepared and submitted to the Los Angeles Department of Building and Safety for review and approval. The design-level geotechnical report will be used for final design of the foundation system for the structures and shall take into consideration the engineering properties beneath the proposed structures and the projected loads. The final report will

specify geotechnical design parameters that are needed by structural engineers to determine the type and sizing of structural building materials. The final report will be subject to the specific performance criteria imposed by all applicable state and local codes and standards. The final geotechnical report will be prepared by a registered civil engineer or certified engineering geologist and include appropriate measures to address seismic hazards and ensure structural safety of the proposed structures. Implementation of mitigation measure **GEO-1** will ensure that the proposed structures (and building materials) are designed and constructed in accordance with all applicable provisions of the California Building Code and the Los Angeles Building Code. Therefore, implementation of this mitigation measure would not result in adverse secondary impacts.

Mitigation measure **PALEO-1** is presented in **Section 4.5**, Geology and Soils, of this Draft EIR, to reduce the Project's potential impacts to paleontological resources during construction. Specifically, mitigation measure **PALEO-1** would require a qualified paleontologist to be retained prior to excavation and grading activities at the Project Site. It requires the paleontologist to develop a site-specific Paleontological Resources Impact Mitigation Program (PRIMP). The PRIMP will follow guidelines developed by the Society for Vertebrate Paleontology and will include, but not be limited to, monitoring of ground disturbance activities in sediments that are likely to include paleontological resources, specimen recovery, and screen washing; preparation of any collected specimens to the point of identification; curation of any collected specimens to a museum repository with permanent, retrievable storage; and preparation of a final compliance report that would provide details of monitoring, fossil identification, and repository arrangements. It requires the paleontologist or monitor to coordinate with construction contractor personnel to provide information regarding City or County of Los Angeles requirements, as applicable, for the protection of paleontological resources. The paleontologist will be required to perform periodic inspections of excavation and grading activities at the Project Site. It would also require samples of excavated material to be collected and processed to determine their fossil potential. If paleontological materials are encountered, the paleontologist will temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and salvage, if necessary. It also requires any fossils recovered during mitigation to be deposited in an accredited and permanent scientific institution for the benefit of current and future generations. Implementation of this mitigation measure would ensure that sensitive paleontological resources are not impacted during construction activities. Therefore, implementation of this mitigation measure would not result in adverse secondary impacts.

6.5.5 Hazards and Hazardous Materials

Mitigation measures **HAZ-1** and **HAZ-2** are included in **Section 4.7**, Hazardous Materials, of this Draft EIR, to reduce the Project's potential impacts regarding hazards and hazardous materials. Mitigation measure **HAZ-1** requires a Soil Management Plan (SMP) to be prepared (by a qualified environmental consultant) due to the potential presence of lead in the soil**.** The SMP will direct how soils will be removed and disposed of. It will be implemented during excavation and grading activities to ensure that any contaminated soils are properly identified, excavated, and disposed of offsite. It also requires that a qualified environmental consultant to be present onsite during grading and excavation activities in the known or suspected locations of contaminated soils and to be available for soils identification and monitoring during construction. Mitigation measure **HAZ-2** requires that the Project Applicant consult with the City of Los Angeles Department of Building and Safety regarding radon at the Project Site. Radon testing will be conducted on the Project Site after the new buildings are constructed to confirm if radon concentrations in the new buildings exceed the USEPA action level Recommendations from the City of Los Angeles Department of Building and Safety regarding

radon will be implemented The Project Applicant will implement any recommendations from the City of Los Angeles Department of Building and Safety regarding radon. These mitigation measures would reduce the potential impacts from hazards and hazardous materials. Implementation of these mitigation measures would reduce impacts during construction and operation of the Project. Thus, implementation of these mitigation measures would not result in adverse secondary impacts.

6.5.6 Noise

Mitigation measures **N-1** through **N-5** are included in **Section 4.9**, Noise, of this Draft EIR, to reduce the Project's potential impacts regarding noise during construction activities. Specifically, mitigation measure **N-1** requires noise monitoring to be conducted in the residential or commercial areas during the suspected noise-producing construction activities; mitigation measure **N-2** requires source controls to be used if there are complaints and/or when ambient noise monitoring shows exceedance of local standards. It also specifies days and time limits of the use of noise-producing equipment, types and models of equipment, the working conditions of construction equipment to reduce potential noise impacts, and the use of alarms to identify noise levels. Any installation of a sound barrier under mitigation measure **N-2** would include limited construction activities associated with installation. The sound barrier would be temporary, and the purpose would be to reduce the Project's noise impacts during construction. Mitigation measure **N-3** directs the use of path controls such as portable noise barriers, enclosures for stationary sources, and storage and maintenance of equipment to reduce impacts to sensitive receivers. Mitigation measure **N-4** requires advanced notice to all noise-sensitive receivers adjacent to the Project area prior to start of construction. The notice will include specifically where and when construction activities will occur, and provide contact information for filing noise complaints with the contractor and the City. Mitigation measure **N-5** requires a construction noise control plan to be prepared and approved prior to construction. The plan will detail how mitigation measures **N-1** though **N-4** will be implemented. The mitigation measures described above would serve to reduce the temporary impacts from noise during construction activities and noise-related impacts to sensitive receivers. Implementation of these mitigation measures would reduce noise impacts during construction. As a result, implementation of these mitigation measures would not result in adverse secondary impacts.

6.5.7 Public Services – Police Protection

Mitigation measures **PS-1** and **PS-2** are included in **Section 4.11.b**, Public Services – Police Protection, of this Draft EIR, to reduce the Project's potential impacts to police protection services during construction and operation of the Project. Mitigation measure **PS-1** requires temporary construction fencing to be installed along the periphery of the active construction areas to screen construction activity from view at the local street level and to keep unpermitted persons from entering the construction area. Mitigation measure **PS-2** requires the Project plans to incorporate LAPD design guidelines from "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", to address security in semi-public and private spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high foot-traffic areas. These measures would be incorporated in the Project design and approved by the City of Los Angeles Police Department prior to the issuance of building permits. Implementation of these mitigation measures would reduce potential impacts on law enforcement or police protection services during both the construction and operational phases of the Project. As a result, implementation of these mitigation measures would not result in adverse secondary impacts.

6.5.8 Public Services – Recreation and Parks

Mitigation measure **PS-3** is included in **Section 4.11.d**, Public Services – Recreation and Parks, of this Draft EIR, to reduce the Project's potential impacts to recreation during construction of the Project. In response to public comments concerning potential construction impacts to the access of Ernest E. Debs Regional Park, Mitigation measure **PS-3** from **Section 4.11.d**, is recommended to reduce potential impacts on nearby park/recreation access to a less than significant level. Mitigation measure **PS-3** will ensure that access to Rose Hill Recreation Center, Rose Hill Park, and Ernest E. Debs Regional park is maintained for the public during construction and that an alternate route would be available for public access if needed. It also stipulates signage requirements for the alternate route to the park/recreation facilities. Implementation of mitigation measure **PS-3** would ensure that access to park/recreation facilities would not be impacted during construction of the Project. Implementation of this mitigation measure would reduce impacts to recreation during construction. Therefore, implementation of this mitigation measure would not result in adverse secondary impacts.

6.5.9 Transportation

Mitigation measures **TRANS-1** through **TRANS-3** are included in **Section 4.12**, Transportation, of this Draft EIR, to reduce the Project's potential impacts to traffic during construction activities. Mitigation measure TRANS-1 requires a Construction Management Plan to be prepared and approved by LADOT prior to commencement of Project construction. The Construction Management Plan will identify truck routes and designated employee parking areas and include a schedule for truck traffic and employee shifts to avoid creating trips during the peak traffic periods, as is feasible for construction operations. All measures including identified truck routes and designated employee parking areas will be included in the Construction Management Plan. Mitigation measure **TRANS-2** requires a Parking Management Plan to be prepared and approved prior to issuance of a demolition permit. The Parking Management Plan will detail how parking will be managed during Project construction and will specify where parking will be available during both phases of Project construction. Mitigation measure **TRANS-3** requires a construction management schedule to be prepared and approved prior to issuance of a demolition permit. The schedule will include a street closure plan to ensure the continued flow of vehicle traffic (including bus traffic, and potential temporary bus stop closure or relocation along Mercury Avenue), pedestrian traffic, and bicycle traffic during temporary street closures for Project construction.

These mitigation measures would ensure that temporary impacts to parking, vehicle, pedestrian, and bicycle flow, and traffic during construction would be reduced to less than significant. Implementation of these mitigation measures would reduce transportation impacts during construction. Thus, implementation of these mitigation measures would not result in adverse secondary impacts.

6.6 Effects Not Found to be Significant

Section 15128 of the State CEQA Guidelines requires that an EIR "contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR." An Initial Study was prepared for the proposed Project (refer to **Appendix B1** of this document). Based on the findings of the Initial Study prepared for the Project, the following topics were found to have either no impact or a less than significant impact on the environment and therefore did not warrant further analysis in the EIR and thus do not warrant mitigation: agriculture and forestry resources; hydrology and water quality,

mineral resources; and utilities and service systems. Refer to the text below for a brief discussion of each of these environmental topics, which were eliminated from further analysis in the EIR, as detailed in the Initial Study (**Appendix B1**).

6.6.1 Agriculture and Forestry Resources

As discussed in Section 4.2 of the Initial Study for this Project (**Appendix B1**), the Project Site contains an existing multi-family apartment complex and is located on land zoned as R1-1D. The Project Site is located in a highly-urbanized setting and contains no agriculture or forest land. Additionally, no agricultural land or forest land is located in the vicinity of the Project Site. Since the Project Site is located in an urban setting designated for residential land use, Project-related changes would not conflict with existing zoning for forest land or timberland, and no impacts would occur.

6.6.2 Hydrology and Water Quality

As discussed in Section 4.9 of the Initial Study for this Project (**Appendix B1**), the Project would be required to implement best management practices (BMPs), to prepare a SWPPP and obtain a construction stormwater NPDES permit. For these reasons, potential violations of water quality standards or waste discharge requirements would be less than significant during Project construction.

The Project's required compliance with the City's low impact development (LID) ordinance would result in less than significant water quality impacts because the Project would improve the quality of the water that runs off of the Project Site and as such the Project would not violate any water quality standards or waste discharge requirements during operation. The Project would not substantially deplete groundwater supplies or result in a substantial net deficit in the aquifer volume or lowering of the local groundwater table.

The Project would be required to implement BMPs in compliance with the City of Los Angeles' LID Ordinance to ensure that stormwater flows from the Project Site would not increase compared to existing conditions. Therefore, development of the Project would not substantially alter the existing drainage pattern of the Project Site in a manner that would result in substantial erosion or siltation on or offsite.

The Project's onsite improvements would include Low Impact Development/Standard Urban Mitigation Plan Best Management Practices for "store & re-use" that will retain and treat the 85th percentile 24-hour runoff event onsite. It is estimated that the Project's post development storm water run-off flowing into drainage infrastructure would be less than the current/exiting conditions. Therefore, the Project would not substantially alter the existing drainage pattern of the site or area, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite.

The Project would not place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary, Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM), or other flood hazard delineation map. No impacts on housing due to flood-flow as a result of the Project is anticipated.

As detailed in the Geotechnical Investigation prepared for the Project, the Project Site is not located within a designated dam inundation area. As a result, the potential for inundation at the Project Site, as a result of an earthquake-induced dam failure is considered low (Geocon, 2018, p. 9). Therefore,

the Project would not expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam, or dam inundation, and no impacts are anticipated.

6.6.3 Mineral Resources

As discussed in Section 4.11 of the Initial Study for this Project (**Appendix B1**), the Project Site is within Mineral Resource Zone (MRZ)-3, which is an area containing mineral deposits, the significance of which cannot be evaluated from available data. The Project Site has been used for multi-family housing since the 1940s and would continue to be used for housing after development of the proposed Project. No mining or mineral extraction activities would occur on the Project Site. Therefore, no impacts are anticipated to: (1) the availability of known mineral resources of value to the region or state residents, or (2) a locally important mineral resource recovery site delineated on a local general, specific, or other land use plan.

6.6.4 Utilities and Service Systems

As discussed in Section 4.18 of the Initial Study for this Project (**Appendix B1**), the Project Site is currently served by existing sewer infrastructure. Wastewater generated by the Project would be typical of other residential land uses in the City of Los Angeles, comprised of domestically generated wastewater. The Hyperion Water Reclamation Plant has the capacity to treat wastewater from the Project. Thus, the Project would not exceed wastewater treatment requirements of the Los Angeles RWQCB.

The City of Los Angeles Bureau of Engineering would review the Project during the final plan check stage and prior to Project approval the Bureau would ensure that the storm drain system has adequate capacity to handle potential runoff from the Project Site. Related, the Project developer, would provide the necessary storm drain infrastructure to serve the Project Site, including any required connections to the existing storm drain system. The Project's onsite improvements would include LID/SUSMP BMPs for "store & re-use" that will retain and treat the 85th percentile 24-hour runoff event onsite. It is estimated that the Project's post development storm water run-off flowing into drainage infrastructure would be less than the current/exiting conditions. Thus, the Project would have a less than significant impact.

As detailed in the Initial Study prepared for the Project, the Project's net increase in water demand is a fraction of the Urban Water Management Plan's Projected demand for multi-family housing at Project buildout (2024). Therefore, the Project would comprise a de minimis demand compared to the anticipated demand from multi-family housing. Thus, population growth and an increase in water demand for the Project is captured by the UWMP's forecasts for increased water demand between 2015 and 2040.

The Project includes the development of water lines to provide adequate water flow to the Project Site for water service and fire suppression needs. The Project would comply with applicable requirements of the City of Los Angeles Department of Public Works and the LAFD such that the Project would provide adequate infrastructure and water flow to the Project Site.

Since there are sufficient water supplies available and the Project does not result in an increase in water demand above that projected in UWMP, Project implementation would not require construction of new water treatment facilities nor expanded entitlements to water supplies. Therefore, less than significant impacts are anticipated.

Since sufficient permitted landfill capacity exists to support occupancy of the Project, no adverse impact on either solid waste collection service or the landfill disposal system would occur. Therefore, Project impacts on existing solid waste disposal facilities are anticipated to be less than significant. Compliance with the plans and policies outlined in the City of Los Angeles Solid Waste Integrated Resources Plan (SWIRP) would ensure waste generated by occupants of the Project is recycled consistent with the policies of the state as implemented by the SWIRP. Therefore, Project impacts related to compliance with federal, state, and local regulations for solid waste are anticipated to be less than significant.

SECTION 7.0 - REFERENCES

7.0 REFERENCES

This section lists all of the references cited in the EIR/EIS.

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SECTION 8.0 – ACRONYMS AND ABBREVIATIONS

8.0 ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Term
§	Section
°F	degrees Fahrenheit
a.m.	ante meridiem
AAQS	Ambient Air Quality Standard
AB	Assembly Bill
AB 52	California Assembly Bill 52
ACM(s)	asbestos-containing material(s)
ADA	Americans with Disabilities Act
ADT	average daily traffic
ADRP	Archeological Data Recovery Plan
AMI	Area Median Income
AMP	Archeological Monitoring Program
ANSI	American National Standards Institute
AOPC	Areas of Potential Concern
APE	Area of Potential Effects
AQMP	Air Quality Management Plan
ARB	California Air Resources Board
ARPA	Archaeological Resources Protection Act
AST	aboveground storage tank
ATP	Archaeological Testing Plan
BAU	business as usual
BGs	block groups
BMPs	Best Management Practices
BRE	Biological Resources Evaluation
BSA	biological study area
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards
Cal-IPC	California Invasive Plant Council
CalRecycle	California Department of Resources Recycling and Recovery
CAOs	Cleanup and Abatement Orders
CBC	California Building Code
CBSC	California Building Standards Code
CCAA	California Clean Air Act
CCR	California Code of Regulations

Acronym/Abbreviation	Term
CDE	California Department of Education
CDFW	California Department of Fish and Wildlife
CDOs	Cease and Desist Orders
CEC	California Energy Code
CEQ	Council on Environmental Quality
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CESA	California Endangered Species Act
CFC	California Fire Code
CFR	Code of Federal Regulations
CGS	California State Geological Survey
CH_4	methane
CHRIS	California Historic Resources Information System
CIWMP	Countywide Integrated Waste Management Plan
CMP	Congestion Management Program
CMPHS	Congestion Management Program High System
CNDDB	California Natural Diversity Database
CNEL	community noise equivalent level
CNPPA	California Native Plant Protection Act
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	CO_2 equivalent
COGs	Councils of Government
Community Plan	Northeast Los Angeles Community Plan
COPCs	Chemicals of Potential Concern
CRHR	California Register of Historical Resources
CWA	Clean Water Act
DAMP	Drainage Area Management Plan
dB	decibel
dBA	A-weighted decibel scale
DE	Design Earthquake
DOC	California Department of Conservation
DPM	Diesel particulate matter
DTSC	Department of Toxic Substances Control
EA	Environmental Assessment
EI	Expansion Index
EIR	Environmental Impact Report
EIR/EIS	Environmental Impact Report/Environmental Impact Statement
EIS	Environmental Impact Statement

Acronym/Abbreviation	Term
EJ	Environmental Justice
EPCRA	Emergency Planning and Community Right to Know Act
ERR	Environmental Review Record
ESA	Endangered Species Act
EV	electric vehicle
FARR	Final Archeological Resources Report
FEMA	Federal Emergency Management Agency
FHSZ	Fire Hazard Severity Zones
FIRM	Flood Insurance Rate Map
FMMP	Farmland Mapping and Monitoring Program
FTA	Federal Transit Administration
FTBMI	Fernandeño Tataviam Band of Mission Indians
FWPCA	Federal Water Pollution Control Act
GHG	greenhouse gas
GIS	Geographic Information System
GP	City of Los Angeles General Plan
GWP	global warming potential
HABS	Historic American Building Survey
HACLA	Housing Authority of the City of Los Angeles
HCID	Housing and Community Investment Department
HCD	California Department of Housing and Community Development
HCM	Highway Capacity Manual
HCP	Habitat Conservation Plan
HFCs	perfluorocarbons
HGL	hydraulic gradient lines
HMBP	Hazardous Materials Business Plan
HMP	City of Los Angeles Hazard Mitigation Plan
HPOZ(s)	Historic Preservation Overlay Zone(s)
HSC	Health and Safety Code
HUD	United States Department of Housing and Urban Development
Hz	hertz
I-5	Interstate 5
IEPR	California's Integrated Energy Policy Report
IPaC	Information, Planning and Conservation
IR	Interpretation of Regulations
IS	Initial Study
JPL	Jet Propulsion Laboratory
L_{90}	noise level that is exceeded 90 percent of the time at a given location
LACFCD	Los Angeles County Flood Control District
LADWP	Los Angeles Department of Water and Power

Acronym/Abbreviation	Term
LAFD	Los Angeles Fire Department
LAMC	Los Angeles Municipal Code
LAPL	Los Angeles Public Library
LARWQCB	Los Angeles Regional Water Quality Control Board
LCFS	Low Carbon Fuel Standard
LCP	Local Coastal Plan
L_{dn}	day-night average noise
L_{eq}	equivalent noise level
LI	Low Income
LID	Low Impact Development
LOS	level of service
LRAs	Local Responsibility Areas
LSTs	localized significance thresholds
LUST	leaking underground storage tank
MBTA	Migratory Bird Treaty Act
MCE	Maximum Considered Earthquake
Metro	Metropolitan Transportation Authority
mgd	million gallons per day
MI	Moderate Income
MLD	most likely descendant
MMRP	Mitigation Monitoring and Reporting Program
MND	Mitigated Negative Declaration
mph	miles per hour
MPOs	Metropolitan Planning Organizations
MRDS	Mineral Resources Data System
MRZ	Mineral Resource Zone
MS4	Municipal Separate Storm Sewer Systems permit
MSL	above mean sea level
MT	Metric tons
MWD	Metropolitan Water District
MWRP	Michelson Water Recycling Plant
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Grave Protection & Repatriation Act
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Plan
NEHRP	National Earthquake Hazard Reductions Program
NHPA	National Historic Preservation Act
NEPA	National Environmental Policy Act
NIST	National Institute of Standards and Technology
NMFS	National Marine Fisheries Service

Acronym/Abbreviation	Term
NO_2	nitrogen dioxide
NOI	Notice of Intent
NO_x	nitrogen oxides
NPS	National Park Service
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NSF	National Science Foundation
NWI	National Wetlands Inventory
O_3	ozone
OCPs	organochlorine pesticides
OEM	Office of Emergency Management
OHP	Office of Historic Preservation
OPR	Office of Planning and Research
OPSC	Office of Public School Construction
OSHA	Occupational Safety and Health Administration
p.m.	post meridiem
PA	Programmatic Agreement
Pb	lead
PD	police department
PFCs	perfluorocarbons
phf	peak hour factor
PHLA	Plan for a Healthy Los Angeles
PM	particulate matter
PM_{10}	respirable particulate matter
$PM_{2.5}$	fine particulate matter
PPV	peak particle velocity
PRC	Public Resources Code
PRP	Public Recreation Plan
PUB	Public Benefit Project with Alternative Compliance
RAC	Resident Advisory Committee
RCP	Regional Comprehensive Plan
RCP	reinforced concrete pipe
RCRA	Resource Conservation and Recovery Act
RE	Responsible Entity
REC	Recognized Environmental Condition
Related	Related Companies of California, LLC
RHNA	Regional Housing Needs Assessment
ROG	reactive organic gases

Acronym/Abbreviation	Term
RPS	Renewables Portfolio Standard
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SB 18	California Senate Bill 18
SB 1818	California Senate Bill 1818
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison Company
SCH	State Clearinghouse
SCS	Sustainable Communities Strategy
SEMS	Standardized Emergency Management System
SF_6	sulfur hexafluoride
SHPO	State Historic Preservation Officer
SIP	California State Implementation Plan
SLF	Sacred Lands File
SMARA	Surface Mining and Reclamation Act
SO_2	sulfur dioxide
SoCalGas	Southern California Gas Company
SOI	Secretary of the Interior
SOP	Species Occurrence Potential
SRA	State Responsibility Area
SRAs	source receptor areas
STP	standard temperature and pressure
SUSMP	Standard Urban Stormwater Mitigation Plan
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TCPs	Traditional Cultural Properties
TCRs	tribal cultural resources
TIA	Traffic Impact Analysis
UBC	Uniform Building Code
UNFCCC	United Nations Framework Convention on Climate Change
USACE	U.S. Army Corps of Engineers
USDA	United States Department of Agriculture
USEPA	United States Environmental Protection Agency

Acronym/Abbreviation	Term
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
USTs	underground storage tanks
VdB	vibration decibels
VLI	Very Low Income
VMT	vehicle miles traveled
VOC	volatile organic compound
VTTM	Vested Tentative Tract Map
WBWG	Western Bat Working Group
WEAP	Workers Environmental Awareness Program
WQCs	Water Quality Certifications
WQMP	Water Quality Management Plan
WSA	Water Supplies Assessment
WTP	Water Treatment Plan
ZC	Zone Change
ZEVs	Zero-Emission Vehicles
ZIMAS	City of Los Angeles Zoning Information Map Access System

SECTION 9.0 – LIST OF PREPARERS

9.0 LIST OF PREPARERS

9.1 Lead Agencies

CEQA Lead Agency
Housing Authority of the City of Los Angeles
2600 Wilshire Boulevard, 3rd Floor
Los Angeles, CA 90057

Jenny Scanlin, Chief Strategic Development Officer
Dhiraj Narayan, Development Officer

NEPA Lead Agency
City of Los Angeles Finance & Development Division
Housing + Community Investment Department (HCID)
1200 W. 7th Street 8th Floor
Los Angeles, CA 90017

Dr. Robert Manford, Environmental Affairs Officer &Manager (former)
Shelly Lo, Environmental Specialist

9.2 Other Agencies

U.S. Department of Housing and Urban Development
Region IX
Los Angeles Federal Building
300 North Los Angeles Street, 4th Floor
Los Angeles, CA 90012

Gregory Morgan Griffin, Regional Environmental Officer
Lauren B. McNamara, Program Environmental Clearance Officer
Michelle Simmons, CSP, REHS, Environmental Protection Specialist

9.3 Project Applicant

Related California
333 South Grand Avenue, Suite 4450
Los Angeles, CA 90071

Rose Olson, Senior Vice President, Development
Jennifer Ing-aram, Project Manager
Barry Kyler, In-house Architect
Steve Wraight, In-house Architect
Alinaghian, Asha, Project Coordinator

9.4 UltraSystems Environmental Inc.

9.4.1 Environmental Planning Team

Hina Gupta, LEED AP, Associate Planner
M.S., Urban and Regional Planning, University of Southern California, Los Angeles, CA
B.Arch., Chandigarh College of Architecture, Chandigarh, India.
Years of Experience: 12

Betsy Lindsay, ENV SP, Principal
M.A., Urban and Regional Planning, California State Polytechnic University, Pomona, CA
Public Policy and Administration, California State University, Long Beach, CA
Business Administration, Pepperdine University, Irvine, CA
B.A., Geography, California State University, Long Beach, CA
Years of Experience: 35+

Margaret Partridge, AICP, LEED Green Associate, ENV SP, Senior Project Manager
M.A., Urban and Regional Planning, University of California, Irvine, CA
B.A., Environmental Analysis and Design, University of California, Irvine, CA
Years of Experience: 14
Sections written: *Aesthetics and Land Use*

9.4.2 Technical Team

Megan Black, Archaeological Technician
M.A., Public Archaeology, California State University, Northridge, CA
B.A., Anthropology, California State University, Long Beach, CA
Years of Experience: 8
Sections written: *Cultural Resources and Tribal Cultural Resources*

Billye Breckenridge, Assistant Project Manager
B.A., University of Nevada Las Vegas, Nevada.
Years of Experience: 17
Sections written: *Biological Resources, Wildfire, Growth Inducement*

Pam Burgett, Word Processor
A.A., Network Systems Administration, DeVry University, Anaheim, CA
Years of Experience: 16
Word Processing/Technical Editing

Allison Carver, Senior Biologist
B.S., Biology, California State University, San Bernardino, CA
B.A., Environmental Studies, California State University, San Bernardino, CA
Years of Experience: 17
Sections written: *Geology & Soils*

Paula Fell, Environmental Planner
M.S., Environmental Sciences, California State University, Fullerton, CA
B.S., Biological Sciences, Kansas State University, Manhattan, KS
Years of Experience: 22
Sections written: *Hazards and Hazardous Materials; Public Health and Safety; Public Services; and Utilities and Service Systems*

Gwendolyn Jackson, Word Processor
M.Div., Pastoral Care & Counseling, Talbot School of Theology
M.A., Christian Education, Talbot School of Theology
B.S., Organizational Leadership, Biola University
Years of Experience: 30+
Word Processing/Technical Editing

Michael Lindsay, Senior Engineer
B.S., Electrical Engineering and Technology, California Polytechnic University, Pomona, CA
Years of Experience: 24
Sections written: *Air Quality, Greenhouse Gases, Noise*

David Luhrsen, Word Processor
B.S., Web Design and Interactive Media, The Art Institute of California, Santa Ana, CA
Years of Experience: 4.5 years
Word Processing/Technical Editing

Joyce Mak, Staff Biologist
B.A., Environmental Analysis and Design, University of California, Irvine, CA
Years of Experience: 9
Biological Resources

Stephen O'Neil, Cultural Resources Manager
M.A., Anthropology, California State University, Fullerton, CA
B.A., Anthropology, California State University, Long Beach, CA
Register of Professional Archaeologists #16104
Years of Experience: 35+
Sections written: *Cultural Resources and Tribal Cultural Resources*

Michael Rogozen, Senior Principal Engineer
D. Env., Environmental Science and Engineering, University of California, Los Angeles, CA
M.S., Systems Engineering, University of California, Los Angeles, CA,
B.S., Engineering, University of California, Los Angeles, CA
Years of Experience: 40+
Sections written: *Air Quality, Greenhouse Gases, Noise*

Mina Rouhi, Senior Planner
M.A., Master of Urban and Regional Planning, California State Polytechnic University, Pomona, CA
B.A., Psychology and Social Behavior, University of California, Irvine, CA
Years of Experience: 11
GIS Mapping

Mohamed Sayed, Environmental Engineer
M.S., Civil and Environmental Engineering, University of Southern California, Los Angeles, CA
B.S., Engineering, The German University
Years of Experience: 8
Sections written: *Hazards & Hazardous Materials, Hydrology & Water Quality, Noise, Transportation & Traffic*

Prathna Maharaj, Environmental Intern
B.S., Environmental Science and Management, University of California, Davis
Years of Experience: 3
Sections written: *Mitigation, Monitoring, and Reporting Program, Recipients of the Draft EIR/EIS*

9.5 Other Firms

ALTEC TESTING & ENGINEERING INC. (Phase I Environmental Site Assessment)

Patrick S Adams, Principal
Lynn Laborde, Senior IH/PM

ALTEC TESTING & ENGINEERING INC. (Limited Asbestos Sampling and Limited Lead Testing)

Jay A. Yowell, Certified Asbestos Consultant & Lead Sampling Technician
Lynn Laborde, Certified Asbestos consultant, Lead Inspector/Risk Assessor & Lead Project Monitor
Mason S. Adams, Certified Asbestos Consultant & Lead Sampling Technician

FUSCOE ENGINEERING

Andrew Willrodt, Principal/Senior Project Manager

GPA CONSULTING (Historic Resources)

Teresa Grimes, Principal Architectural Historian

OB-1 AIR ANALYSES, INC.

Joe O'Bannon, President/CEO
Air Quality and Greenhouse Gas Emissions

SITE DESIGN STUDIO (Landscape Architect)

Hector Baeza, President

AMJ CONSTRUCTION MANAGEMENT, INC. (Dry Utility Consultant)

Jack Wickersham III, Project Manager

WITHEE MALCOLM ARCHITECTS, LLP

Mauricio Munoz, Architectural Design Principal
Dirk Thelen, Principal
Dan Withee, Partner

9.6 Persons and Organizations Contacted

Native American Heritage Commission

Gail Totton, Ph.D., Associate Governmental Program Analyst

Native American Tribes

Fernandeño Tataviam Band of Mission Indians:

Jairo Avila, Tribal Historic and Cultural Preservation Officer
Alan Salazar, Chairman, Elders Council
Beverly Salazar Folkes, Elders Council

Gabrieleno Band of Mission Indians – Kizh Nation:

Andrew Salas, Chairperson

Gabrieleno/Tongva San Gabriel Band of Mission Indians:

Anthony Morales, Chairperson

Gabrielino/Tongva Nation:

Mr. Sam Dunlap, Cultural Resources Director
Ms. Sandonne Goad, Chairperson

Gabrielino Tongva Indians of California Tribal Council:

Robert F. Dorame, Tribal Chair

Gabrielino-Tongva Tribe

Charles Alvarez, Council Member
Linda Candelaria, Co-Chairperson

San Fernando Band of Mission Indians

Donna Yocum, Chairperson

SECTION 10.0 – CONSULTATION AND COORDINATION

10.0 CONSULTATION AND COORDINATION

This section provides a list of federal, state, and local agencies and organizations contacted during preparation of the EIR/EIS.

Agency	Contact Person	Address	Contact Information
Federal Agencies			
U.S. Department of Housing and Urban Development (HUD) Region IX	Lauren B. McNamara Program Environmental Clearance Officer Community Planning and Development	Los Angeles Federal Building 300 North Los Angeles Street, 4th Floor Los Angeles, CA 90012	Phone: (202) 402-4466
State Agencies			
State Historic Preservation Office (SHPO)	Ms. Julianne Polanco, State Historic Preservation Officer	State Office of Historic Preservation 1725 23rd Street, Suite 100 Sacramento, CA 95816	Phone: (916) 445-7000 julianne.polanco@parks.ca.gov
Native American Tribal Organizations			
Native American Heritage Commission (NAHC)	Gayle Totton, M.A., PhD. Associate Governmental Program Analyst	1550 Harbor Blvd. Suite 100 West Sacramento, CA 95691	Phone: (916) 373-3714 gayle.totton@nahc.ca.gov
NAHC	Katy Sanchez, Assistant Government Program Analyst	1550 Harbor Blvd. Suite 100 West Sacramento, CA 95691	Phone: (916) 373-3710
Fernandeño Tataviam Band of Mission Indians	Beverly Salazar Folkes, Elders Council	1931 Shady Brooks Drive Thousand Oaks, CA, 91362	Phone: (805) 558-1154 folkes9@msn.com
Fernandeño Tataviam Band of Mission Indians	Jairo Avila Tribal Historic and Cultural Preservation Officer	1019 Second Street, Suite 1 San Fernando, CA 91340	Phone: (818) 837-0794 Fax: (818) 837-0796 jairo.avila@tataviam-nsn.us
Fernandeño Tataviam Band of Mission Indians	Alan Salazar, Chairman Elders Council	1019 Second Street, Suite 1 San Fernando, CA 91340	Phone: (805) 423-0091
Gabrieleño Band of Mission Indians - Kizh Nation	Andrew Salas, Chairperson	P.O. Box 393 Covina, CA 91723	Phone: (626) 926-4131 admin@gabrielenoindians.org
Gabrieleno/Tongva San Gabriel Band of Mission Indians	Anthony Morales, Chairperson	P.O. Box 693 San Gabriel, CA 91778	Phone: (626) 483-3564 Fax: (626) 286-1262 GTTribalcouncil@aol.com

Agency	Contact Person	Address	Contact Information
Gabrielino /Tongva Nation	Sandonne Goad, Chairperson	106-½ Judge John Aiso St., #231 Los Angeles, C, 90012	Phone: (951) 807-0479 sgoad@gabrielino-tongva.com
Gabrielino Tongva Indians of California Tribal Council	Robert F. Dorame, Chairperson	P.O. Box 490 Bellflower, CA, 90707	Phone: (562) 761-6417 Fax: (562) 761-6417 gtongva@gmail.com
Gabrielino-Tongva Tribe	Charles Alvarez	23454 Vanowen Street West Hills, CA 91307	Phone: (310) 403-6048 roadkingcharles@aol.com
San Fernando Band of Mission Indians	Donna Yocum, Chairperson	P.O. Box 221838 Newhall, CA 91322	Phone: (503) 539-0933 Fax: (503) 574-3308 ddyocum@comcast.net
Gabrielino/Tongva Nation	Mr. Sam Dunlap, Cultural Resources Director	P.O Box 86908 Los Angeles, CA 90086	Phone: (909) 262-9351 samdunlap@earthlink.net
Gabrielino-Tongva Tribe	Ms. Linda Candelaria, Co-Chairperson	1999 Avenue of the Stars, Suite 100 Los Angeles, CA 90067	Phone: (626) 676-1184 lcandelaria@gabrielinotribe.org
Local Agencies			
City of Los Angeles, Department of City Planning	Vincent Bertoni, Director	City of Los Angeles Planning Department 200 N. Spring Street, Room 525, Mail Stop 395 Los Angeles, CA 90012	Phone: (213) 978-1271
City of Los Angeles Department of City Planning	Lisa Webber, AICP, Deputy Director	City of Los Angeles Planning Department 200 N. Spring Street, Room 525, Mail Stop 395 Los Angeles, CA 90012	Phone: (213) 978-1274
City of Los Angeles Department of City Planning, Major Projects and EIR Division	Heather Bleemers, Senior City Planner	City of Los Angeles Major Projects and EIR Division 221 N. Figueroa, 13th Floor, Los Angeles, CA 90012	Phone: (213) 847-3682
City of Los Angeles Historic Resources Division	Ken Bernstein, Division Manger	City of Los Angeles Historic Resources Division 221 N. Figueroa Street, 13TH Floor, Los Angeles, CA 90012	Phone: (213) 847-3652
City of Los Angeles	Mindy Nguyen	City of Los Angeles Major Projects and EIR Division 221 N. Figueroa, 13th Floor, Los Angeles, CA 90012	Phone: (213) 847-3674
Housing Authority of the City of Los Angeles (HACLA)	Dhiraj Narayan, Development Officer	2600 Wilshire Boulevard Los Angeles, CA 90057	RHCRedev.CEQA@hacla.org Phone: (213) 252-6120
HACLA	Jenny Scanlin, Chief Strategic Dev. Officer	2600 Wilshire Boulevard Los Angeles, CA 90057	RHCRedev.CEQA@hacla.org Phone: (213) 252-6120

Agency	Contact Person	Address	Contact Information
Housing + Community Investment Department (HCID)	Shelly Lo, Environmental Specialist	1200 W. 7th Street 8th Floor Los Angeles, CA 90017	shelly.lo@lacity.org

SECTION 11.0 – MITIGATION MONITORING AND REPORTING PROGRAM

11.0 DRAFT MITIGATION MONITORING AND REPORTING PROGRAM

11.1 Introduction

Section 21081.6 of the *Public Resources Code* requires all state and local agencies to establish monitoring or reporting programs whenever approval of a project relies upon a mitigated negative declaration or an environmental impact report (EIR). The monitoring or reporting program must ensure implementation of the measures being imposed to mitigate or avoid the significant adverse environmental impacts identified in the mitigated negative declaration or EIR.

The mitigation measures will be implemented by the developer, HACLA or other agencies such as the City of Los Angeles at different times during the implementation of the Project. Some mitigation will require implementation prior to the issuance of any permits, while others will be implemented during construction, and others throughout all the phases. The following table lists the potentially significant environmental impacts, the mitigation measures, the level of significance after mitigation, the responsible parties and monitoring parties, and the phase in which mitigation is to be implemented.

The areas requiring mitigation are:

- Aesthetics
- Biological Resources
- Cultural Resources
- Geology and Soils/Paleontological Resources
- Hazards and Hazardous Materials
- Noise
- Public Services (Police Protection, Recreation and Parks)
- Transportation

Those environmental topics for which there less than significant impacts without mitigation are discussed in their respective sections of this document but are not included in the table below because no mitigation is warranted. Those environmental topics include:

- Air Quality
- Greenhouse Gas Emissions
- Land Use and Planning
- Population and Housing
- Public Services (Fire Protection, Schools, and Libraries)
- Tribal Cultural Resources
- Wildfire
- Energy

In addition to mitigation measures, the Project includes a Project Design Feature (PDF) for Recreation and Parks, Greenhouse Gas Emissions, and Energy, which are listed in the table below.

Table 11.0-1
DRAFT MITIGATION MONITORING AND REPORTING PROGRAM

Issue Area	Project Design Features (PDFs) or Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
PROJECT DESIGN FEATURES				
Greenhouse Gas Emissions				
Energy Conservation and Efficiency	**GHG-PDF-1** Project design will provide an energy efficiency exceeding Title 24, Part 6, California Energy Code baseline standard requirements, based on the 2016 Building Energy Efficiency Standards requirements.[99]	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF
Energy Conservation and Efficiency	**GHG-PDF-2** Use of high-efficiency Energy Star appliances, where appropriate.	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF
Water Conservation	**GHG-PDF-3** Inclusion of water conservation measures in accordance with the Los Angeles Department of Water and Power requirements for new development in the City of Los Angeles (e.g., high-efficiency fixtures and appliances, weather-based irrigation systems, drought-tolerant landscaping).	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF
Water Conservation	**GHG-PDF-4** Use of drought-tolerant plants and indigenous species, stormwater collection, permeable pavement wherever possible, and stormwater filtration, storage and re-use for landscaping.	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF
Water Conservation	**GHG-PDF-5** Use of high-efficiency toilets, including dual-flush water closets, as appropriate.	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF

99 For analysis purposes, a value of 10% more efficient than Title 24 was used in the CalEEMod model.

Issue Area	Project Design Features (PDFs) or Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
Water Conservation	**GHG-PDF-6** Use of high-efficiency showerheads at 1.5 gallons per minute. Install no showers with multiple showerheads.	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF
Water Conservation	**GHG-PDF-7** Use of high-efficiency Energy Star appliances, where appropriate.	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF
Water Conservation	**GHG-PDF-8** Use of weather-based irrigation controller with rain shutoff, matched precipitation (flow) rates for sprinkler heads, and rotating sprinkler nozzles or comparable technology such as drip/micro spray/subsurface irrigation where appropriate.	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF
Water Conservation	**GHG-PDF-9** Installation of a separate water meter (or submeter), flow sensor, and master valve shutoff for irrigated landscape areas totaling 5,000 square feet and greater.	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF
Water Conservation	**GHG-PDF-10** Use of proper hydro-zoning and turf minimization, as feasible.	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF
Water Quality	**GHG-PDF-11** Installation of pre-treatment stormwater infrastructure for the stormwater treatment system.	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF
Water Quality	**GHG-PDF-12** Reduce stormwater runoff through the introduction of new landscaped areas throughout the Project Site and/or on the structure.	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF
Air Quality	**GHG-PDF-13** Prohibit the use of any fireplaces in the proposed residential units.	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF

Issue Area	Project Design Features (PDFs) or Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
Recreation and Parks				
Recreation and Parks	**Recreation and Parks PDF-1** Not less than 90 days prior to the anticipated construction completion the Project Applicant will reach out to the City of Los Angeles Department of Recreation and Parks staff responsible for the programming (if any) at various neighborhood, community, and regional parks located within a 2-mile radius of the Project site to consider mutually beneficial partnership between park programs, operations, and improvements. These parks and recreation facilities include, but are not limited to, El Sereno Arroyo Playground, El Sereno Community Gardens, Henry Alvarez Memorial Park, Hermon Dog Park, Hermon Park, Arroyo Seco Park, Carlin G. Smith Recreation Center, Cypress Recreation Center, Cypress Recreation Center, Downey Recreation Center, Ascot Hills Park and Charles F. Lummis Home.	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF
Energy				
Thresholds 4.15.3.3 (a) and (b): *(a): Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?* *(b) Would the Project conflict with or obstruct a state or local plan for*	Refer to Project Design Features listed above, which are reproduced under Greenhouse Gases: **GHG-PDF-1** through **GHG-PDF-10** above.	Refer to **GHG-PDF-1** through **GHG-PDF-10** above.	Refer to **GHG-PDF-1** through **GHG-PDF-10** above.	Refer to **GHG-PDF-1** through **GHG-PDF-10** above.

Issue Area	Project Design Features (PDFs) or Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
renewable energy or energy efficiency?				
MITIGATION MEASURES				
Aesthetics				
Threshold 4.1.3.3 (b): *Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*	Refer to Mitigation Measures **CUL-1** and **CUL-2** below.	Significant and Unavoidable regarding Historic Architectural Resources	Refer to **MM CUL-1** and **CUL-2** below.	Refer to **MM CUL-1** and **CUL-2** below.
Biological Resources				
Threshold 4.3.3.3 (a): *Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.?*	**MM BR-1: Nesting Bird Surveys** If Project activities begin during nesting bird season (generally February 1 – August 31), no earlier than one week prior to ground-disturbing activities, a qualified biologist shall conduct preconstruction nesting bird clearance surveys within the Project Site and within a 100-foot buffer around the Project Site for nesting birds, and other sensitive species. To maintain compliance with the Migratory Bird Treaty Act and California Fish and Game Code, and to avoid or minimize direct and indirect effects on migratory non-game nesting birds, and their nests, young, and eggs, the following measures shall be implemented. • Project activities that will remove or disturb potential nest sites should be scheduled outside the nesting bird season, if feasible. The nesting bird nesting season is typically from February 1 through August 31, but can vary slightly from year to year, usually depending on weather	Less Than Significant	Project Applicant/ The Housing Authority of the City of Los Angeles (HACLA)	Prior to commencement of Project construction and throughout the duration of construction activities that result in tree or vegetation removal

Issue Area	Project Design Features (PDFs) or Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	conditions. Raptors are known to begin nesting early in the year and ends late. The raptor nesting bird season begins January 1 to September 15. • If Project activities that will remove or disturb potential nest sites cannot be avoided during February 1 through August 31, a qualified biologist shall conduct a pre-construction survey for nesting birds within the limits of Project disturbance up to seven days prior to mobilization, staging and other disturbances. Preconstruction surveys shall be conducted no more than three days prior to vegetation, substrate, and structure removal and/or disturbance. • If neither nesting birds nor active nests are observed during the pre-construction survey(s), or if they are observed and will not be affected (i.e. outside the buffer zone described below), then Project activities may begin and no further nesting bird monitoring will be required. • If an active bird nest is located during the pre-construction survey and will potentially be affected, a no-activity buffer zone shall be delineated on maps and marked in the field by fencing, stakes, flagging, or other means up to 500 feet for raptors, or 100 feet for non-raptors. Materials used to demarcate the nests will be removed as soon as work is complete or the fledglings have left the nest. The biologist will determine the appropriate size of the buffer zone based on the type of activities planned near the nest and bird species. Buffer zones shall not be disturbed until a qualified biologist determines that the nest is inactive, the young have fledged, the young are no longer being fed by the parents, the young have left the area, or the young will no			

Issue Area	Project Design Features (PDFs) or Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	longer be affected by Project activities. Periodic monitoring by a biologist will be performed to determine when nesting is complete. After the nesting cycle is complete, Project activities may begin within the buffer zone.			
Threshold 4.3.3.3 (a): *Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.?*	**MM BR-2: Biological Monitor** • The applicant shall retain a qualified Biological Monitor to conduct pre-construction surveys and biological monitoring during construction. If special-status wildlife species or protected nesting birds are observed and determined present within the BSA during the pre-construction breeding bird surveys, then the qualified biological monitor shall be onsite to monitor throughout the duration of construction activities that result in tree or vegetation removal, to minimize the likelihood of inadvertent impacts on nesting birds and other wildlife species. Monitoring shall also be conducted periodically during construction activities to ensure no new nests occur during vegetation removal or building demolition activities between February 1 through August 31. The biological monitor shall ensure that biological mitigation measures, best management practices, avoidance, and protection measures and mitigation measures described in the relevant project permits and reports are in place and are adhered to. • The Biological Monitor shall have the authority to halt all construction activities and all non-emergency actions if sensitive species and/or nesting birds are identified and would be directly impacted. The monitor will notify the appropriate resource agency and consult if needed. If necessary, the monitoring biologist	Less Than Significant	Project Applicant/HACLA	If Project activities begin during nesting bird season (generally February 1 – August 31), no later than one week prior to ground-disturbing activities

Issue Area	Project Design Features (PDFs) or Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	shall relocate the individual outside of the work area where it will not be harmed. Work can continue at the location if the applicant and the consulted resource agency determine that the activity will not result in impacts on the species. • The appropriate agencies shall be notified if a dead or injured protected species is located within the Project Site. Written notification shall be made within 15 days of the date and time of the finding or incident (if known) and must include: location of the carcass, a photograph, cause of death (if known), and other pertinent information.			
Cultural Resources				
Threshold 4.4.3.3 (a): *Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?*	**MM CUL-1:** The Project Applicant shall prepare an interpretive display and install it in the new community building on the redeveloped Rose Hill Courts property. The interpretive display shall be completed to coincide with the opening of the community building once construction is complete. It shall include a brief history of the historic property, its significance in the contexts of public and defense worker housing in Los Angeles during the Second World War and public housing design related to the Garden City and Modern movements, and a description of the Undertaking which led to the demolition of the historic property. The display shall be professionally written, illustrated, and designed. The content shall be prepared by persons meeting the Secretary of the Interior's (SOI) Professional Qualifications Standards for Architectural History. HCID shall ensure that the Project Applicant has satisfactorily completed the interpretive display as described in this stipulation and submit the draft content to SHPO for review and approval. SHPO shall have 30	Significant and Unavoidable regarding Historic Architectural Resources	Project Applicant/HACLA and HCID	After Project construction is complete

Issue Area	Project Design Features (PDFs) or Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	days to review the interpretive display content before it is produced and installed. (This is PA Stipulation I.A.)			
Threshold 4.4.3.3 (a): *Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?*	**MM CUL-2:** HACLA shall add to its existing website a section dedicated to the history of HACLA and public housing in Los Angeles within six (6) months of completing the Rose Hill Courts Redevelopment Project. The website shall provide content on the history of the agency, the significance of public housing in the City, and notable examples of public housing architecture and site planning. It shall include links to other scholarly sources of information on the history and design of public housing. The new website section shall be professionally written, illustrated, and designed. The content shall be prepared by persons meeting the SOI Professional Qualifications Standards for Architectural History. HCID shall ensure that HACLA has satisfactorily completed the new website section as described in this stipulation and submit the draft content to SHPO for review and approval. SHPO shall have thirty (30) days to review the content before it is published. Once the new website section is complete, HACLA shall publicize it in its monthly newsletter. (This is PA Stipulation I.B.)	Significant and Unavoidable regarding Historic Architectural Resources	HACLA/HCID	Within six months of completing the Rose Hill Courts Redevelopment Project
Geology and Soils				
Thresholds 4.5.3.3 (a) ii and iii, (c), and (d). ***Threshold 4.5.3.3 (a):*** *Would the project expose people or structures to potential substantial*	**MM GEO-1:** Prior to issuance of grading permits, the Applicant shall submit final design plans and a final design-level geotechnical report to the Los Angeles Department of Building and Safety for review and approval. The design-level geotechnical report shall be used for final design of the foundation system for the structures and	Less Than Significant		

Issue Area	Project Design Features (PDFs) or Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
adverse effects, including the risk of loss, injury, or death involving: *ii) Strong seismic ground shaking?* *iii) Seismic-related ground failure, including liquefaction?* ***Threshold 4.5.3.3 (c):*** *Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?* ***Threshold 4.5.3.3 (d):*** *Would the project be located on expansive soil, as defined in Table 18 1 B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?*	shall take into consideration the engineering properties beneath the proposed structures and the projected loads. The final report shall specify geotechnical design parameters that are needed by structural engineers to determine the type and sizing of structural building materials. The final report shall be subject to the specific performance criteria imposed by all applicable state and local codes and standards. The final geotechnical report shall be prepared by a registered civil engineer or certified engineering geologist and include appropriate measures to address seismic hazards and ensure structural safety of the proposed structures. The proposed structures shall be designed and constructed in accordance with all applicable provisions of the California Building Code and the Los Angeles Building Code. The design-level geotechnical report shall address each of the recommendations provided in the Geotechnical Investigation Report prepared by Geocon West Inc. (Geocon, 2019; **Appendix J**); dated May 16, 2018 (Revised January 2019), including, but not limited to the following: • Grading, shoring and foundation plans shall be reviewed by the Geotechnical Engineer prior to finalization to verify that the plans have been prepared in substantial conformance with the recommendations of the Geotechnical Investigation Report (Geocon, 2019) and to provide additional analyses or recommendations. • Based on the final foundation loading configurations, the potential for settlement shall be reevaluated.			

Issue Area	Project Design Features (PDFs) or Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	• All excavations shall be observed and approved in writing by the Geotechnical Engineer. Prior to placing any fill, the excavation bottom shall be proof-rolled with heavy equipment in the presence of the Geotechnical Engineer. • All onsite excavations shall be conducted in such a manner that potential surcharges from existing structures, construction equipment, and vehicle loads are resisted. The surcharge area shall be defined by a 1:1 projection down and away from the bottom of an existing foundation or vehicle load. Penetrations below this 1:1 projection shall require special excavation measures such as sloping or shoring. • As a minimum, the upper 5 feet of existing earth materials within the proposed building footprint areas shall be excavated and properly compacted for foundation and slab support. Deeper excavations shall be conducted as necessary to remove existing artificial fill or soft alluvial soil at the direction of the Geotechnical Engineer. Proposed building foundations shall be underlain by a minimum of 3 feet of newly placed engineered fill. The excavation shall extend laterally a minimum distance of 3 feet beyond the building footprint areas, including building appurtenances, or a distance equal to the depth of fill below the foundation, whichever is greater. • Due to the expansive potential of the subgrade soils, the moisture content in the slab and foundation subgrade shall be maintained at 2 percent above optimum			

Issue Area	Project Design Features (PDFs) or Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	moisture content prior to and at the time of concrete placement. • After finish pad grades have been achieved, laboratory testing of the subgrade soil shall be performed to confirm the corrosivity characteristics of the soils. • To minimize or avoid the potential for concrete or metal corrosion in onsite soils, a corrosion engineer shall be retained prior to construction to evaluate corrosion test results and incorporate any necessary precautions into project design. • Concrete mix design shall be reviewed by a qualified corrosion engineer to evaluate the general corrosion potential of the soils on the Project Site. • Buried metallic structures and elements shall be designed with corrosions protection as determined by a qualified corrosion engineer. • Project Site soils shall be evaluated for expansion in the final geotechnical report. • All surface water shall be diverted away from excavations. • Waterproofing of subterranean walls and slabs shall be required to prevent moisture intrusion and water seepage. Particular care shall be taken in the design and installation of waterproofing to avoid moisture problems, or actual water seepage into the structure through any normal shrinkage			

Issue Area	Project Design Features (PDFs) or Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	cracks which may develop in the concrete walls, floor slab, foundations and/or construction joints. • A waterproofing consultant shall be retained in order to recommend a product or method, which would provide protection to subterranean walls, floor slabs and foundations. • Back-drains, if utilized, shall be designed per the recommendations of the final geotechnical report. • Sub-drainage pipes at the base of the retaining wall drainage system shall outlet to an acceptable location via controlled drainage structures. Drainage shall not be allowed to flow uncontrolled over descending slopes. • Retaining walls shall include a drainage system extended at least two-thirds the height of the wall. At the base of the drain system, a subdrain covered with a minimum of 12 inches of gravel shall be installed, and a compacted fill blanket or other seal placed at the surface. The clean bottom and subdrain pipe, behind a retaining wall, shall be observed by the Geotechnical Engineer prior to placement of gravel or compacting backfill. • Wall backfill specifications (e.g., material gradation, compaction requirements, etc.), and surcharge conditions shall be designed			

Issue Area	Project Design Features (PDFs) or Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	per the recommendations of final geotechnical report. • Walls shall be properly drained to prevent buildup of hydrostatic pressures behind walls or be designed to withstand hydrostatic pressures. • Seismic lateral forces shall be incorporated into the design as necessary. The structural engineer shall determine the seismic design category for the project in accordance with Section 1613 of the CBC. If the project possesses a seismic design category of D, E, or F, proposed retaining walls in excess of 6 feet in height should be designed with seismic lateral pressure (Section 1803.5.12 of the 2016 CBC). • The results of the percolation testing shall be evaluated by the project civil engineer to determine if a stormwater infiltration system is required. • All site drainage shall be collected and controlled in non-erosive drainage devices. Drainage shall not be allowed to flow uncontrolled over any descending slope or pond anywhere on the site, and especially not against any foundation or retaining wall. • Positive site drainage shall be provided away from structures, pavement, and the tops of slopes to swales or other controlled drainage structures. The building pad and pavement areas shall be fine graded such that water is not allowed to pond. Discharge from downspouts, roof drains, and scuppers shall not occur onto unprotected soils within 5			

Issue Area	Project Design Features (PDFs) or Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	feet of the building perimeter. Planters located adjacent to foundations shall be sealed to prevent moisture intrusion into the soils providing foundation support.			
Threshold 4.5.3.3 (f): *Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*	**MM PALEO-1:** A qualified paleontologist (approved by the City or County of Los Angeles, as applicable, and the Los Angeles County Natural History Museum Vertebrate Paleontology Department) shall be retained prior to excavation and grading activities at the Project Site. • Prior to the earth-moving activities, the paleontologist shall develop a site-specific Paleontological Resources Impact Mitigation Program (PRIMP) to be implemented in support of the Project in order to mitigate potential adverse impacts to paleontological resources. The PRIMP shall follow guidelines developed by the Society for Vertebrate Paleontology and shall include, but not be limited to, monitoring of ground disturbance activities in sediments that are likely to include paleontological resources, specimen recovery, and screen washing; preparation of any collected specimens to the point of identification; curation of any collected specimens to a museum repository with permanent, retrievable storage; and preparation of a final compliance report that would provide details of monitoring, fossil identification, and repository arrangements. The Project Applicant shall then comply with the recommendations of the Project paleontologist and requirements of the PRIMP.	Less Than Significant	Project Applicant/HACLA	Project grading/construction

Issue Area	Project Design Features (PDFs) or Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	• Before the mitigation program begins, the paleontologist or monitor shall coordinate with the appropriate construction contractor personnel to provide information regarding City or County of Los Angeles requirements, as applicable, for the protection of paleontological resources. Contractor personnel shall be briefed on procedures to be followed in the event that fossil remains and a previously unrecorded fossil site are encountered by earth-moving activities, particularly when the monitor is not on site. • The qualified paleontologist shall perform periodic inspections of excavation and grading activities at the Project Site to determine the presence of fossiliferous soils. The frequency and location of inspections shall be specified in the PRIMP and shall depend on the depth of excavation and grading activities and the materials being excavated. When Puente Formation sediments (known to contain Miocene marine fossils) are encountered (generally at depths of 11 to 16 feet or more at the Project site) the paleontologist shall monitor full time during excavation. If paleontological materials are encountered, the paleontologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. A copy of the paleontological survey report shall be submitted to the Los Angeles County Natural History Museum. Any fossils recovered during mitigation shall be deposited in an accredited and permanent			

Issue Area	Project Design Features (PDFs) or Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	scientific institution for the benefit of current and future generations.			
Hazards and Hazardous Materials				
Threshold 4.7.3.3 (b): *Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*	**MM HAZ-1:** Due to the presence of lead in the soil at the Project Site, a Soil Management Plan (SMP) shall be prepared. Prior to the commencement of grading and excavation, the Project Applicant shall retain a qualified environmental consultant to prepare a SMP that complies with all applicable regulatory requirements. The SMP shall be submitted to the City of Los Angeles Department of Building and Safety for review and approval prior to the commencement of excavation and grading activities. The SMP shall contain the following: • The recommendations of the HHMD and LAFD. • The SMP shall require that the Project Applicant to remove and properly dispose of impacted materials in accordance with applicable requirements of the DTSC, and County of Los Angeles Fire Department. • The SMP shall require that contaminated soils be transported from the Project Site by a licensed transporter and disposed of at a licensed storage/ treatment facility to prevent contaminated soils from becoming airborne or otherwise released into the environment.	Less Than Significant	Project Applicant/City of Los Angeles Department of Building and Safety	Prior to the submittal of building plans to the City of Los Angeles Department of Building and Safety

Issue Area	Project Design Features (PDFs) or Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	• The SMP shall be implemented during excavation and grading activities. • A qualified environmental consultant shall be present on the Project Site during grading and excavation activities in the known or suspected locations of contaminated soils, and shall be on call at other times as necessary, to monitor compliance with the SMP and to actively monitor the soils and excavations for evidence of contamination.			
Threshold 4.7.3.3 (b): *Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*	**MM HAZ-2:** Prior to issuance of the Building Permit(s), the Project Applicant shall consult with the City of Los Angeles Department of Building and Safety regarding radon at the Project Site. After construction of each Phase, radon testing shall be conducted on the Project Site to confirm if radon concentrations in the new buildings on the Project Site exceed the USEPA action level of 4.0 pCi/L. The results of the radon tests shall be provided to the City of Los Angeles Department of Building and Safety. The Project Applicant shall implement any recommendations from the City of Los Angeles Department of Building and Safety regarding radon.	Less Than Significant	Project Applicant / City of Los Angeles Department of Building and Safety	Prior to the submittal of building plans to the City of Los Angeles Department of Building and Safety
Noise				
Threshold 4.10.3 (a): *Would the Project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards*	**MM N-1:** The construction contractor will conduct noise monitoring near sensitive receivers identified for this Project, during the suspected noise producing construction activities. During times that active construction equipment is within 200 feet of a residence or other sensitive receiver, noise measurements will be taken for at least three	Potentially Significant sometimes during Project construction	Project Applicant/HACLA and City of Los Angeles Planning Department	During Project construction

Issue Area	Project Design Features (PDFs) or Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
established in the local general plan or noise ordinance, or applicable standards of other agencies?	15-minute periods per hour for two hours. If the monitored noise levels exceed background (ambient) noise levels by 5 dB or feet of a residence or other sensitive receiver for two or more 15-minute periods per hour, then the construction contractor will mitigate noise levels using temporary noise shields, noise barriers or other mitigation measures to comply with those restrictions or standards. (See mitigation measures N-2 and N-3 below.)			
Threshold 4.10.3 (a): *Would the Project result in 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?*	**MM N-2:** The construction contractor will use the following source controls, in response to complaints and/or when ambient noise monitoring of complainant's exposure shows that noise from construction exceeds ambient levels by at least 5 dBA, except where not physically feasible: • Use of noise producing equipment will be limited to the interval from 8:00 a.m. to 5:00 p.m., Monday through Friday. • For all noise producing equipment, use types and models that have the lowest horsepower and the lowest noise generating potential practical for their intended use. • The construction contractor will ensure that all construction equipment, fixed or mobile, is properly operating (tuned up) and lubricated, and that mufflers are working adequately. • Have only necessary equipment on site. • Use manually adjustable or ambient sensitive backup alarms.	Potentially Significant sometimes during Project construction	Project Applicant/HACLA and City of Los Angeles Planning Department	During Project construction

Issue Area	Project Design Features (PDFs) or Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
Threshold 4.10.3 (a): *Would the Project result in 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?*	**MM N-3:** The contractor will use the following path controls, in response to complaints and when ambient noise monitoring of complainant's exposure shows exceedance of local standards, except where not physically feasible: • Install portable noise barriers, including solid structures and noise blankets, between the active noise sources and the nearest noise receivers. • Temporarily enclose localized and stationary noise sources. • Store and maintain equipment, building materials and waste materials as far as practical from as many sensitive receivers as practical.	Potentially Significant sometimes during Project construction	Project Applicant/HACLA and City of Los Angeles Planning Department	During Project construction
Threshold 4.10.3 (a): *Would the Project result in 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?*	**MM N-4:** Advance notice of the start of construction shall be delivered to all noise sensitive receivers adjacent to the Project area. The notice shall state specifically where and when construction activities will occur, and provide contact information for filing noise complaints with the contractor and the City.	Potentially Significant sometimes during Project construction	Project Applicant/HACLA and City of Los Angeles Planning Department	During Project construction

Issue Area	Project Design Features (PDFs) or Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
Threshold 4.10.3 (a): *Would the Project result in 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?*	**MM N-5:** Before issuance of a building permit, the building contractor shall prepare, and the City shall review and approve, a Construction Noise Control Plan. The plan shall include and describe in detail how mitigation measures N-1 though N-4 will be implemented.	Significant and Unavoidable sometimes during Project construction	Project Applicant/HACLA and City of Los Angeles Planning Department	During Project construction
Public Services - Police Protection				
Threshold 4.11.b.3.1 (a): *Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for Police protection?*	**MM PS-1:** Temporary construction fencing shall be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area.	Less than significant	Project Applicant/ HACLA	Prior to the commencement of Project construction

Issue Area	Project Design Features (PDFs) or Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
Threshold 4.11.b.3.1 (a): *Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for Police protection?*	**MM PS-2:** Project plans shall incorporate the "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", published by the LAPD relative to security, semi public and private spaces, which may include but not be limited to, access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high foot-traffic areas. These measures shall be approved by the City of Los Angeles Police Department prior to the issuance of building permits.	Less than significant	Project Applicant/HACLA and City of Los Angeles Police Department	Prior to the issuance of building permits by the City of Los Angeles
Public Services - Recreation and Parks				
Threshold 4.11.d.3.3 (a), (b) and (c): *(a) Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios,*	**MM PS-3:** During Project construction the construction contractor shall ensure that access to Rose Hill Recreation Center, Rose Hill Park, and Ernest Debs Regional park is maintained for the public. If access to these facilities is temporarily blocked off during construction, the construction contractor shall ensure that an alternate route is available for public access and the contractor shall provide signs clearly marking the alternate route to the park/recreation facilities.	Less than significant	Project Applicant/HACLA	During Project construction

Issue Area	Project Design Features (PDFs) or Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
response times or other performance objectives for parks? ***Threshold (b)**: Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?* ***Threshold (c)**: Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*				

Issue Area	Project Design Features (PDFs) or Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
Transportation				
Threshold 4.15.3 (a): *Would the Project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*	**MM TRANS-1:** Prior to the commencement of Project construction, the Project Applicant for the Project will submit a detailed Construction Management Plan (with copy to HACLA) to be reviewed and approved by LADOT. In the Construction Management Plan, it will specify that the Construction Manager will schedule truck traffic and employee shifts to avoid creating trips during the peak traffic periods, as is feasible for construction operations. All measures including identified truck routes and designated employee parking areas must be included in the Construction Management Plan.	Less than significant	Project Applicant/ City of Los Angeles	Prior to issuance of a demolition permit
Threshold 4.15.3 (a): *Would the Project conflict with a program plan, ordinance or policy address the circulation system, including transit, roadway, bicycle and pedestrian facilities?*	**MM TRANS-2:** Prior to issuance of a demolition permit, the Project applicant shall submit to the City of Los Angeles Planning Department (with copy to HACLA) and the Planning Department shall approve a construction management schedule. The schedule shall include a street closure plan that details how vehicle traffic (including bus traffic, and potential temporary bus stop closure or relocation along Mercury Avenue), pedestrian traffic, and bicycle traffic will flow during temporary street closures during both Phase I and Phase II of Project construction.	Less than significant	Project Applicant/ City of Los Angeles Department of City Planning	Prior to issuance of a demolition permit
Threshold 4.15.3 (c): *Would the Project result in inadequate emergency access?*	**MM TRANS-3:** Prior to issuance of a grading permit, the Project applicant shall submit to the City of Los Angeles Department of City Planning (with copy to HACLA) a construction management schedule that details truck traffic and employee shifts to avoid creating trips during the PM peak	Less than significant	Project Applicant/ City of Los Angeles Department of City Planning	Prior to issuance of a grading permit

Issue Area	Project Design Features (PDFs) or Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	period. The schedule will specify that all truck trips shall be completed before 3:00 p.m. each day to avoid both employee and truck trips being generated during the PM peak period.			

SECTION 12.0 – RECIPIENTS OF THE DRAFT EIR/EIS

12.0 RECIPIENTS OF THE DRAFT EIR/EIS

This section includes a list of agencies, organizations, and individuals to whom notification of availability of the Draft EIR/EIS was sent. Refer to **Appendix A4**, Distribution List.

12.1 Agencies and Organizations

Adrian Scott Fine, Dir. of Advocacy, Los Angeles Conservancy

Alan Salazar, Chairman, Elders Council Fernandeño Tataviam Band of Mission Indians

Andrade, R.J. Sr., Our Lady of Guadalupe, Rose Hill

Andrew Salas, Chairperson, Gabrieleno Band of Mission Indians - Kizh Nation

Anthony Morales, Chairperson, Gabrieleno/Tongva San Gabriel Band of Mission Indians

Bart Koch, Environmental Health & Services Manager, Metropolitan Water District

Bonnie Hulkower, AICP, Environmental Planner, U.S. Dept. of Housing & Urban Development

Charles Alvarez Gabrielino-Tongva Tribe

Charles C. Holloway, Manager, Department of Water and Power

Charlie Rausch, Associate, Zoning City of Los Angeles Department of City of Planning

City of Los Angeles, Bureau of Street Lighting

Crime Prevention Section, Los Angeles Police Department

Cultural Heritage Commission

Deborah Smith, Executive Officer, LA Regional Water Quality Control Board

Dhiraj Narayan, Development Officer, Housing Authority of the City of Los Angeles

Donna Yocum, Chairperson, San Fernando Band of Mission Indians

El Sereno Branch Library

El Sereno Historical Society

Enrique C. Zaldivar, Director, PW/Bureau of Sanitation

G. Morgan Griffin, Regional Environmental Officer, HUD – San Francisco Regional Office

Hector Santiago, Deputy Office Director, Federal Highway Administration – CalSouth

Jairo Avila, THPO Fernandeño Tataviam Band of Mission Indians

James Ramos, Chairperson, California Native American Heritage Commission

John Vidovich, Deputy Chief, Fire Prevention, LAFD

Jose Diaz, Chatsworth Office Dept. of Toxic Substances Control (DTSC)

Jose Huizar, City of Los Angeles Council Member, District 14

Julianne Polanco, State Historic Preservation Officer

Ken Bernstein, Manager, Office of Historic Resources

Kren Malone, CLS Director, Library Department

Laurie Berman, Director, California Department of Transportation

Los Angeles County Clerk

LA 32 Neighborhood Council

Lupe Buenrostro, Glen Alta Elementary School

Maria Martin, Env. Affairs Officer, Bureau of Engineering

Marian Coleman, Assistant Deputy Executive Officer, Compliance & Enforcement (C&E), So. Coast Air Quality Mgmt. District

Mark Pestrella, Director, LA County Department of Public Works

Matias Farfan, Asst. Chief, Legislative Analyst

Michael Shull, General Manager, Dept. of Recreation and Parks

Mike Stoker, Regional Administrator, US EPA Pacific Southwest, Region 9

Nazario Sauceda, Interim Director, Bureau of Street Maintenance

Norma Isahakian, Executive Director of the Bureau of Street Lighting, City of Los Angeles

Patrick Schanen, Environmental Health Manager, Los Angeles Unified School District

Richard H. Llewellyn, CAO

Robert Dorame, Chairperson, Gabrielino Tongva Indians of California Tribal Council

Rufus Washington, CPD Director, HUD - Los Angeles Field Office

Sandonne Goad, Chairperson, Gabrielino/Tongva Nation

Shelley Lo, Environmental Specialist Los Angeles Housing + Community Investment Department (HCID)

State Clearinghouse

Steven Leonido-John, Associate Director, EPA Southern California Field Office

Tomas Carranza, Principal Transportation Engineer, Department of Transportation

Vincent Bertoni, Director, City of Los Angeles City Planning Department

12.2 Individuals (Owners)

Abraham Ramirez	Alfredo and Nora Lopez	Alina Reyes	Allan S Tam
Alvaro Virgen	Amy Tang	Ana Figueroa	Angelica Sandoval
Antonia Estrada-Magallo	Antonia Perez	Archdiocese of LA	Arroyo Services LLC
Arturo L. Iniguez	Arturo Marquez	Aurora Mardueno	Ba Tran
Blade A. Bollman	Blanca Reyes	Braulio Montemayor	Bryn Dudkowski
Cao T. Hoa	Carbajal Family Trust	Carmela Iniguez	Carmen Olmos
Cesar Cardenas	Connie Lopez	Dai Tran	Dale Shaw
Dalila Araiza	Dap Dinh V. TR	Dap V. Dinh Trust	Delia Martinez
Denise M. Vukojevich	Deutsche Bank Natl Trust Co c/o One West Bank	Dora A. McDonald Trust	Doris Otero
Dulce I. Shaw and Dale O. Shaw	Dung To	Duong Tran	E. P. and R. A. Patron Trust
Edgardo and Romana Patron TRS	Edith Heredia	Eduardo Martinez	Efrain Guzman
Elisa Montano	Elisa Zapien	Elsa C Marroquin	Enrique Perez, Jr.
Estela Castro	Evangelina Rivera	Farrell E Gerbode, Jr.	Flor Jimenez
Francisca Paniagua	Georgina Dang	Georgina Luciano	Geronimo Lopez
Gilberto Flores	Gregoria Arreola	Guadalupe Rios	Guillermo Lopez
Gustavo A. Rivas	Hector Flores	Hector Fuentes	Henry Nandino
Henry TR Nandino	Herlinda Garza	Hilda Peralta	Inez Conner
Irene Guerra	Islam Ansarul	J & G Development LLC	Jessica Nunez Rivas
Jewel Gorden	Jimenez Sanchez	Joe Hernandez	Jorge T. Rodriguez
Jose and Norma Roman	Jose L Macias	Jose Perez	Jose R Covarrubias
Jose Ramos	Jose Valdez	Juan Herrera	Juan Lopez
Juan Rodriguez	Karla Ortega	Ken and Nghia To	Kishena Jackson
Lennox Mende	Lidia Lopez	Linda Nguyen	Lorena Gil
Luc Dang	Luciano Roldan	Luisa Olan	Ly Mai
Manuel Torres	Marcelina Martinez	Margarita Herrera	Margarita Ruiz
Margarita Tovar	Maria Alvarenga	Maria Berrios	Maria Carbajal
Maria De La Luz Avila	Maria Delgado Campuza	Maria Juarez	Maria Martinez

Maria Ramirez	Maribel Bizuet	Maribel Covarrubias	Maricruz Aguilar
Mercedes Martinez	Minh T. Truong	Mirian Perez Luna	Morelia Gomez
Moises Araiza	Nam C. Paek	Natalie D Thurman	Olga Osuna
Oliver Ortiz	Oscar Martinez Sr.	Pablo Colapinto	Pat Gonzalez
Pedro M. Carbajal	Phung Nguyen	Rachel Rodriguez	Roman Catholic Archbishop of LA
Rosa C. Jimenez	Roselena McBride	Roxana Mejia	Ruben Lopez
Salvador Flores	Salvador G. Jimenez Trust	Samuel Estebes	Scott M Toland
Sergia Peralta	Sergio Martinez	Shan S Kwong	Silvia Lopez
Silvia Munoz	Susana Montemayor	Susanna Calderon	Tala Presley
Teresa Aguilar	Teresa Jaramillo	Teresa Maldonado	Thelma Piedrasanta
Trinidad Luna	Tu Tien	U Lok Chan	Urvish Patel
Veronica Mendez	Victor Aceves	Victoria Garivay	Virginia Morales
Vitalina Gonzalez	Yolanda Ruiz	Zoe Dolan	

12.3 Elected Officials

Jose Huizar, Councilmember, 14th District

12.4 October 4, 2018 Scoping Meeting- Individuals Who Left Contact Information Via the Sign-In Sheet

Angelia Sandoval

Anthony Manzano

Cecilia Martinez

Christian Arenas

Doctor Tom Williams

Francisco Guerrero

Gilberto Flores

Hua Wang

Jared Baxter

Juan Rodriguez

Julio Torres

Lisa Moncure

Maria de la Luz Avila

Maria F. Alvarenga

Maria Martinez

Manual Salcido

Margarita Tovar

Mercedes Martinez

Silvia Munoz

Trinidad Luna

Virginia Morales

12.5 October 4, 2019 Scoping Meeting- Individuals Who Left Contact Information Via a Comment Card

Doctor Tom Williams

Hua Wang

Julio Torres, Field Deputy on behalf of Anthony Manzano

12.6 Commenters Who Commented During the IS/EA Public Review Period and Included their Contact Information

Alan Lin, Caltrans District 7

Andrew Salas, Chairman

Christian Arenas

Daniel Charlier-Smith, Lozeau Drury LLP (commented twice)

Daniel Garcia, Program Supervisor at the South Coast Air Quality Management District

Doctor Tom Williams (commented four times)

Francisco Guerrero (commented three times)

Gabrieleño Band of Mission Indians-Kitz Nation

Scott Morgan, Director of the State Clearinghouse

Jean Prijatel, Environmental Review Section, US Environmental Protection Agency Region 9

Jorge Garcia, President of the El Sereno Historical Society

12.7 Interested Parties who will be notified via Email

People from scoping meeting sign in sheet:
Angelica Sandoval
Anthony Manzano
Cecilia Martinez
Christian Arenas
Dr. Tom Williams
Francisco Guerrero
Hua Wang
Jared Baxter
Julio Torres
Lisa Moncure
Manuel Salcido

People from scoping meeting comment letters:
Hua Wang: See Above
Dr. Tom Williams: See Above

People who commented during the IS/EA comment period but only listed an email (not street address):
Andrew Salas
Christian Arenas
Daniel Charlier-Smith
Daniel Garcia
Dr. Robert Manford
Dr. Tom Williams
Francisco Guerrero
Gabrieleño Band of Mission Indians-Kitz Nation
Jean Prijatel
Jorge Garcia

Stakeholder email addresses:
LA 32 Neighborhood Council
Marleen Fonseca
Victor Ayala
Angela Duarte
Maria Valdivia
Jorge Garcia
Lisa Moncure
Rocio Contreras
Julio Torres
Marcella Cortez
Lupe Buenrostro
Luc Dang

LA-32 email addresses (LA-32 NC Board):
Alexandra Dawson
Carmen Tata
Carol Aguinaga
Christopher Perez
Cynthia Sandoval
David Chacon
Johnny Gurski
Jose Medina
Mark Fuentes
Melissa Kellogg
Peter Kightlinger
Sylvia Cruz
Tom Williams

SECTION 13.0 – ENVIRONMENTAL IMPACT STATEMENT

13.0 ENVIRONMENTAL IMPACT STATEMENT

The Draft EIS (NEPA) portion of this Draft EIR/EIS will be available for review on September 11, 2019 at the following website addresses listed below:

http://hcidla.lacity.org/NEPA-review

http://www.hacla.org/dsprojects/ID/8/Rose-Hill-Courts

Contact information is provided below:

Shelly Lo, Environmental Specialist
Environmental Services Unit, Housing Development Bureau
Los Angeles Housing + Community Investment Department (HCIDLA)
1200 W. 7th Street, 8th Floor, Los Angeles, CA 90017
Email: shelly.lo@lacity.org
Telephone: (213) 808-8879

The public comment period on the Draft EIS portion of the Draft EIR/EIS will begin on September 20, 2019 and will close at 5:00 p.m. on November 4, 2019. CDs and paper copies of the Draft EIR/EIS will also be made available for public review at the following locations during regular business hours:

- HACLA at 2600 Wilshire Blvd, Los Angeles, CA 90057
- The Administrative Office of the Rose Hill Courts Community Center located at 4446 Florizel St., Los Angeles, 90032. To review the Draft EIR/EIS, please contact Mario Ramsey at: (323) 342-6710 to schedule an appointment for viewing.
- El Sereno Branch Library, located at 522 Huntington Drive S., Los Angeles, CA 90032, (T: 323/225-9201).