INITIAL STUDY

ROSE HILL COURTS REDEVELOPMENT

CEQA Analysis Prepared for:

Housing Authority of the City of Los Angeles
2600 Wilshire Boulevard, 4th Floor
Los Angeles, CA 90057

Prepared by:

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September 2018

PROJECT INFORMATION SHEET

1. Project Title	Rose Hill Courts Redevelopment
2. CEQA Lead Agency and Address	**Housing Authority of the City of Los Angeles** 2600 Wilshire Boulevard, 4th Floor Los Angeles, CA 90057
3. Contacts and Phone Numbers	**Housing Authority of the City of Los Angeles** Dhiraj Narayan, Development Officer 2600 Wilshire Boulevard Los Angeles, CA 90057 Telephone: 213-252-6120 Email: RHCRedev.CEQA@hacla.org
4. Project Location	4446 Florizel Street Los Angeles, CA 90032
5. Assessor's Parcel Number	5305-011-900
6. Project Site General Plan Designation	Low Residential (City of Los Angeles, 2018)
7. Project Site Zoning Designation	[Q]R1-1D (City of Los Angeles, 2018)
8. Surrounding Land Uses and Existing Conditions	The Rose Hill Courts Redevelopment project is located on a 5.24-acre site. 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 site is currently developed with a total of 15 buildings, comprised of 14 residential buildings with 100-multi-family units, and one administration building. 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.

9. Description of Project

The project will consist of the demolition of 100 existing units and 1 administration building and the construction of 191 affordable housing units to be developed in two phases.

Proposed improvements include the following:

- 191 affordable housing units
- 176 parking spaces
- Property management and maintenance office
- New landscaping

Proposed Construction Schedule. Construction for each phase is expected to be completed within an 18-24-month time frame. The project would be constructed in two phases to develop the proposed 191 units. During Phase I 94 units would be constructed and during Phase II 97 units would be constructed. Opening years for the two phases are estimated to be: 2022 for Phase I and 2025 for Phase II.

10. Other Public Agencies whose Approval is Required

- Housing Authority of the City of Los Angeles (CEQA Lead Agency)

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ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Term
AB 939	California Integrated Waste Management Act
ACM(s)	Asbestos-Containing Material(s)
AFY	acre-feet per year
AIA	Airport Influence Area
Altec	Altec Testing and Engineering, Incorporated
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
AMI	Area Median Income
BMPs	Best Management Practices
BOS	Bureau of Sanitation
CalFire	California Department of Forestry and Fire Protection
Cal-IPC	California Invasive Plant Council
Caltrans	California Department of Transportation
CAOs	Cleanup and Abatement Orders
CBC	California Building Code
CCR	California Code of Regulations
CDOs	Cease and Desist Orders
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CMP	Congestion Management Program
CNEL	Community Noise Equivalent Level
CWA	Clean Water Act
dB	decibel
dBA	A-weighted decibel scale
DOC	California Department of Conservation
DOSH	California Division of Safety and Health
DTSC	Department of Toxic Substances Control
EA	Environmental Assessment
EIR/EIS	Environmental Impact Report/Environmental Impact Statement
ESA	Environmental Site Assessment
FAR	floor area ratio
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FMMP	Farmland Mapping and Monitoring Program
gpd	gallons per day
GWR	Los Angeles Groundwater Replenishment
HACLA	Housing Authority of the City of Los Angeles

Acronym/Abbreviation	Term
HCID	City of Los Angeles Housing + Community Investment Department
HCP	Habitat Conservation Plan
HUD	United States Department of Housing and Urban Development
HWRP	Hyperion Water Reclamation Plant
IS	Initial Study
LADWP	Los Angeles Department of Water and Power
LAFD	City of Los Angeles Fire Department
LAPL	Los Angeles Public Library
LAR	Los Angeles River
LASAN	Los Angeles Bureau of Sanitation
LAUSD	Los Angeles Unified School District
LID	low impact development
LR	Low Residential
LRA(s)	Local Responsibility Area(s)
LUST	leaking underground storage tank
MBTA	Migratory Bird Treaty Act
MFI	median family income
mgd	million gallons per day
MND	Mitigated Negative Declaration
MRF	Material Recovery Facilities
MRDS	Mineral Resources Data System
MWD	Metropolitan Water District
NCCP	Natural Community Conservation Plan
ND	Negative Declaration
NECP	Northeast Los Angeles Community Plan
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NPDES	National Pollutant Discharge Elimination System
PRC	Public Resources Code
RAC	Resident Advisory Committee
RCRA	Resource Conservation and Recovery Act
RECs	Recognized Environmental Conditions
Related	Related Companies of California, LLC
RHNA	Regional Housing Needs Assessment
RWQCB	Regional Water Quality Control Board
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SMARA	Surface Mining and Reclamation Act
SoCalGas	Southern California Gas Company

Acronym/Abbreviation	Term
SRA	State Responsibility Area
SUSMP	Standard Urban Stormwater Mitigation Plan
SWIRP	City of Los Angeles Solid Waste Integrated Resources Plan
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UWMP	Urban Water Management Plan
WWECP	Wet Weather Erosion Control Plan
§	Section
°F	Degrees Fahrenheit

1.0 INTRODUCTION

1.1 Existing Conditions

The existing public housing complex is comprised of fifteen 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.

1.2 Project

The proposed two-phase project includes: the demolition of Rose Hill Courts' existing fifteen structures and subsequent construction of 191 affordable housing units onsite. The project proposes 102 one-bedroom units; 61 two-bedroom units, 20 three-bedroom units, and eight 4-bedroom units. Rose Hill Courts was constructed in 1942 by the Housing Authority of the City of Los Angeles (HACLA) as a low-income public housing project. The Rose Hill Courts complex is located at 4446 Florizel Street, on a 5.24-acre site. The site is located within the Northeast Los Angeles Community Plan (NECP), in the Rose Hill neighborhood area of the City of Los Angeles.

1.2.1 Project Components

The project at Rose Hill Courts would consist of the development of 191 affordable housing units in two phases as depicted in **Table 1.1-1** below and as described in **Section 3.0** of this document.

Table 1.1-1
ROSE HILL COURTS REDEVELOPMENT PHASING

Phase 1			Phase 2		
Unit Lettering/Floor	Unit Type	Number of Units	Unit Lettering	Unit Type	Number of Units
1A	1BR / 1BATH	60	1A	1BR / 1BATH	28
2A	2BR / 1BATH	18	2A	2BR / 1BATH	12
2B	2BR / 1BATH	7	2B	2BR / 1BATH	4
3	3BR / 2BATH	5	3	3BR / 2BATH	4
4	4BR / 2BATH	4	1B	1BR / 1BATH	10
Total	--	94	1C	1BR / 1BATH	4
			2C	2BR / 1BATH	12
			TH2	2BR / 1BATH	8
			TH3	3BR / 2BATH	11
			TH4	4BR/2Bath	4
			Total	--	97

Notes:
BR= Bedroom
BATH= Bathroom
Source: Withee Malcolm Architects, 2018. Composite Site Plan dated January 30, 2018.

1.2.2 Planned Construction Activities and Phasing

Projected construction improvements are expected to occur starting in 2020 for Phase I and 2023 for Phase 2. During Phase I existing residents living in buildings scheduled to be demolished will be required to vacate their apartment units on site and temporarily relocate. For Phase II, residents in the remaining original buildings will be permanently relocated to the completed Phase I buildings. This phasing schedule will allow for a majority of the residents to remain onsite during project construction. 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 the 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 and permanently relocate from Rose Hill Courts, full relocation assistance for permanent replacement housing will be available. A total of 32 buildings would be constructed onsite, with two buildings being built during Phase I and 30 buildings being constructed during Phase II.

1.3 Project Onsite Amenities

Potential project amenities include: a fitness center, laundry area, community room, community center that incorporates the history of Rose Hill Courts and the surrounding neighborhood, onsite property management, and onsite social services.

1.4 Project Applicant

Related California
Attn: Rose Olson, Senior Vice President, Development
333 South Grand Avenue, Suite 4450
Los Angeles, CA 90071

1.5 Lead Agencies – Environmental Review Implementation

The HACLA is the Lead Agency for the project. Pursuant to the California Environmental Quality Act (CEQA) and its implementing regulations (Public Resources Code §§ 21000 – 21177), the Lead Agency has the principal responsibility for implementing and approving a project that may have a significant effect on the environment.

The United States Department of Housing and Urban Development (HUD) is the Lead Agency for the project pursuant to the National Environmental Policy Act (NEPA) because federal funding will be utilized for the project (Title 24, Part 58 of the CFR).

The City of Los Angeles Housing + Community Investment Department (HCID) would be the Certifying Agency on behalf of HUD with respect to the acceptance of the Environmental Assessment (EA) that would be prepared pursuant to NEPA. HCID will work on behalf of HUD for the NEPA process and HACLA will be involved with the CEQA process.

Section 106 of the National Historic Preservation Act (NHPA) requires that all federal agencies planning actions defined as undertakings to consider the effects of Federally funded projects on

historic properties. The SHPO's responsibility in a review and compliance context is restricted to providing recommendations and comments on a federal agency's determinations or inventories, reports, and plans prepared under the authority of project- or agency-specific Agreement Documents.

1.6 CEQA Overview

Below is an overview of the CEQA process.

1.6.1 Purpose of CEQA

Discretionary projects within California are potentially subject to environmental review under CEQA. A project is defined in CEQA Guidelines § 15378 as the whole of the action having the potential to result in a direct physical change or a reasonably foreseeable indirect change to the environment and is any of the following:

- An activity directly undertaken by any public agency including but not limited to public works construction and related activities clearing or grading of land, improvements to existing public structures, enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements.

- An activity undertaken by a person which is supported in whole or in part through public agency contracts, grants, subsidies, loans, or other forms of assistance from one or more public agencies.

- An activity involving the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies.

CEQA Guidelines § 15002 lists the basic purposes of CEQA as follows:

- Inform governmental decision makers and the public about the potential, significant environmental effects of proposed activities.

- Identify the ways that environmental damage can be avoided or significantly reduced.

- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.

- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

1.7 Purpose of Initial Study

The CEQA process begins with a public agency making a determination as to whether the project is subject to CEQA. If the project is exempt, no environmental review is required. If the project is not exempt, the Lead Agency takes the second step and conducts an Initial Study (IS) to determine whether the project may have a significant effect on the environment.

The purposes of an IS as listed in § 15063(c) of the CEQA Guidelines are to:

- Provide the Lead Agency with information necessary to decide if an Environmental Impact Report (EIR), Negative Declaration (ND), or Mitigated Negative Declaration (MND) should be prepared.

- Enable a Lead Agency to modify a project to mitigate adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a ND or MND.

- Assist in the preparation of an EIR, if required, by focusing the EIR on adverse effects determined to be significant, identifying the adverse effects determined not to be significant, explaining the reasons for determining that potentially significant adverse effects would not be significant, and identifying whether a program EIR, or other process, can be used to analyze adverse environmental effects of the project.

- Facilitate an environmental assessment early during project design.

- Provide documentation in the ND or MND that a project would not have a significant effect on the environment.

- Eliminate unnecessary EIRs.

- Determine if a previously prepared EIR could be used for the project.

In cases where no potentially significant impacts are identified, the Lead Agency may issue a ND, and no mitigation measures would be needed. Where potentially significant impacts are identified, the Lead Agency may determine that mitigation measures would adequately reduce these impacts to less than significant levels. The Lead Agency would then prepare an MND for the project. If the Lead Agency determines that individual or cumulative effects of the proposed project would cause a significant adverse environmental effect that cannot be mitigated to less than significant levels, then the Lead Agency would require an EIR to further analyze these impacts.

This IS has been prepared in compliance with the CEQA to scope out the environmental topics for which the project would either have a less than significant impact or no impact for all of the thresholds under each respective issue area. Issues in this IS that are found to have a potentially significant impact will be analyzed in an EIR to be prepared for the project. That EIR will focus only on those environmental topics that were found to be potentially significant based on the findings of this IS. This IS will be appended to the EIR that will be prepared for the project.

1.8 Review and Comment by Other Agencies

Other public agencies are provided the opportunity to review and comment on the IS. Each of these agencies is described briefly below.

- A Responsible Agency (14 CCR § 15381) is a public agency, other than the Lead Agency, that has discretionary approval power over the project, such as permit issuance or plan approval authority.

- Agencies with Jurisdiction by law (14 CCR § 15366) are any public agencies who have authority (1) to grant a permit or other entitlement for use; (2) to provide funding for the project in question; or (3) to exercise authority over resources which may be affected by the project. Furthermore, a city or county will have jurisdiction by law with respect to a project

when the city or county having primary jurisdiction over the area involved is: (1) the site of the project; (2) the area in which the major environmental effects will occur; and/or (3) the area in which reside those citizens most directly concerned by any such environmental effects.

1.9 Impact Terminology

The following terminology is used to describe the level of significance of potential impacts:

- A finding of ***no impact*** is appropriate if the analysis concludes that the project would not affect the particular environmental threshold in any way.

- An impact is considered ***less than significant*** if the analysis concludes that the project would cause no substantial adverse change to the environment and requires no mitigation.

- An impact is considered ***less than significant with mitigation incorporated*** if the analysis concludes that the project would cause no substantial adverse change to the environment with the inclusion of environmental commitments, or other enforceable measures, that would be adopted by the lead agency.

- An impact is considered ***potentially significant*** if the analysis concludes that the project could have a substantial adverse effect on the environment.

An EIR is required if an impact is identified as ***potentially significant***.

1.10 NEPA Overview

Below is an overview of the NEPA process.

1.10.1 Purpose of NEPA for HUD Projects

The NEPA is our basic national charter for protection of the environment, and 40 CFR (Code of Federal Regulations), Parts 1500–1508 establish the basic procedural requirements for compliance with NEPA. The NEPA procedures are to be followed by all Federal agencies and apply to HUD policy actions (as defined in § 50.16), and to all HUD project actions [§ 50.2(a)(2)]. As part of policy § 1500.2(c) NEPA is required to integrate its requirements with other planning and environmental review procedures (such as CEQA) that are required by law, so that all such procedures run concurrently rather than consecutively. Additionally, under NEPA § 1500.2(d), public involvement is encouraged to facilitate decisions that would affect the quality of the human environment. The NEPA process also encourages the identification and assessment of a reasonable range of alternatives to the proposed actions that will avoid or minimize adverse effects of these actions upon the quality of the human environment. Lastly, consistent with the requirements of NEPA § 1500.2(f), the use of practicable means should be considered to restore and enhance the quality of the human environment and avoid or minimize any possible adverse effects of their actions upon the quality of the human environment.

1.10.2 Integration of Environmental Review

As part of this NEPA process, the environmental review record will utilize, to the fullest extent, environmental documentation prepared as part of the CEQA process.

1.11 Organization of Initial Study

This IS is organized to satisfy CEQA Guidelines § 15063(d), and includes the following sections:

- **Section 1.0 - Introduction**, which identifies the purpose and scope of the IS.
- **Section 2.0 - Environmental Setting**, which describes location, existing site conditions, land uses, zoning designations, topography, and vegetation associated with the project site and surroundings.
- **Section 3.0 - Project Description**, which provides an overview of the project objectives, a description of the proposed development, project phasing during construction, and discretionary actions for the approval of the project.
- **Section 4.0 - Environmental Checklist**, which presents checklist responses for each resource topic to identify and assess impacts associated with the project.
- **Section 5.0 - References**, which includes a list of documents cited in the IS.
- **Section 6.0 - List of Preparers**, which identifies the primary authors and technical experts that prepared the IS.

Technical studies and other documents, which include supporting information or analyses used to prepare the IS, are included in the following appendices:

- Appendix A Project Site Plan
- Appendix B Certified Arborist Memo
- Appendix C Geotechnical Investigation

1.12 Findings from the Initial Study

1.12.1 No Impact or Impacts Considered Less than Significant

Based on the findings of this IS, the project would have no impact or a less than significant impact on the following environmental categories listed from Appendix G of the CEQA Guidelines.

- Agriculture and Forestry Resources
- Hydrology and Water Quality
- Mineral Resources
- Utilities and Service Systems

1.12.2 Impacts Considered Potentially Significant and Requiring Further Analysis

Based on IS findings, the project would have a potentially significant impact on the following environmental categories listed in **Appendix G** of the CEQA Guidelines:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources

- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation and Traffic
- Tribal Cultural Resources

The above listed topics will be further analyzed in an Environmental Impact Report/Environmental Impact Statement (EIR/EIS) that will be prepared for the project.

2.0 ENVIRONMENTAL SETTING

2.1 Project Location

The Rose Hill Courts complex is located at 4446 Florizel Street, on an improved 5.24-acre site. The site is located within the NECP, in the Rose Hill neighborhood area of the City of Los Angeles, approximately 10 miles from downtown Los Angeles (see **Figure 2.1-1**). Local surface streets surrounding the site include: 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 housing complex from west to east. Mercury Avenue, a City collector street, provides direct access to the project site from Monterey Road and Huntington Drive. See **Figure 2.1-2**.

2.2 Project Setting

Rose Hill Courts is an existing public housing complex that is comprised of 15 structures and an asphalt paved surface parking lot. The 14 residential structures together contain 100 multi-family units, and one structure includes an administration building. Buildings throughout the complex are rectangular and arranged in parallel groupings. These groupings include:

(1) North Block: the administration building facing Florizel Street;

(2) Western Block: three rectangular apartment buildings;

(3) Eastern Block: five rectangular apartment buildings of which four are square; and

(4) Southern Block: six rectangular apartment buildings.

There are five building types onsite. All of the buildings are either one or two stories in height, and consist of wood-frame construction, concrete slab foundations, and composition roofing. Parking for the apartment complex consists of surface parking spaces located along both sides of the driveway that bisects the project site.

The site (APN 5305-011-900) is located on a slope. The boundary is further described as "TRACT # 13089, Lots 1, 2, 3, 4, 5, and 6." The northwestern end of the project site is the highest point and the southeastern end of the project site is the lowest point. Surface water drainage at the site appears to be by sheet flow along existing ground contours to the City streets. See **Figure 2.2-1**. Vegetation consists of non-native grasses and trees located between the buildings throughout the site. Photographs depicting the project site are provided in **Figure 2.2-2**.

2.2.1 Planning Area

Rose Hill Courts is located in the NECP of the City (see **Figure 2.2-3**). The NECP area encompasses 15,000 acres and is occupied by 250,000 residents. The NECP area includes numerous hills and valleys lying east of the Los Angeles River (LAR). It also serves as a geographic transition between the downtown center of Los Angeles and the neighboring cities of Alhambra (east); South Pasadena (northeast); and Glendale (northwest) as well as the city of Monterey Park (southeast), and the unincorporated community of City Terrace (south) (City of Los Angeles, 2016, p. 1-1).

Figure 2.1-1
PROJECT VICINITY

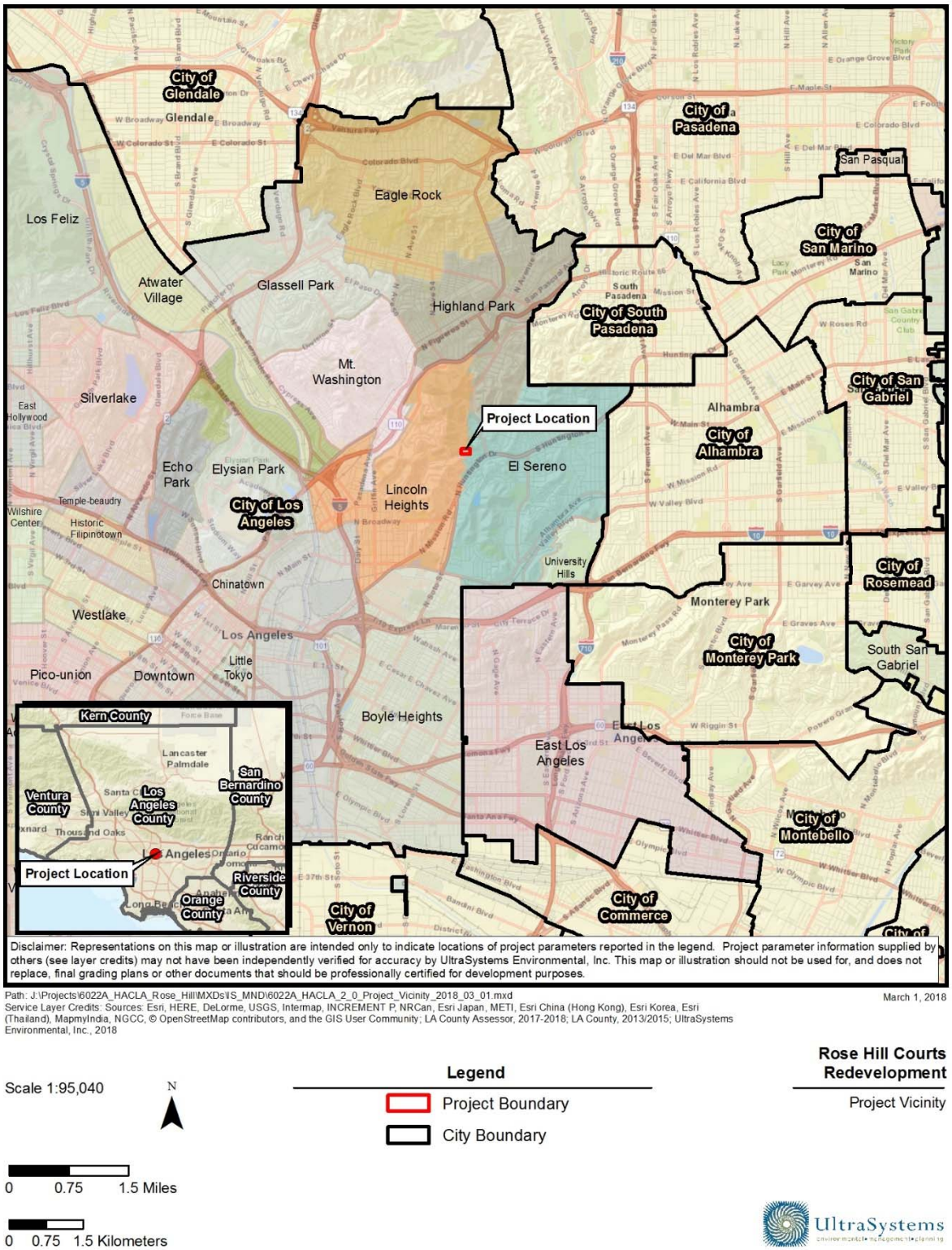
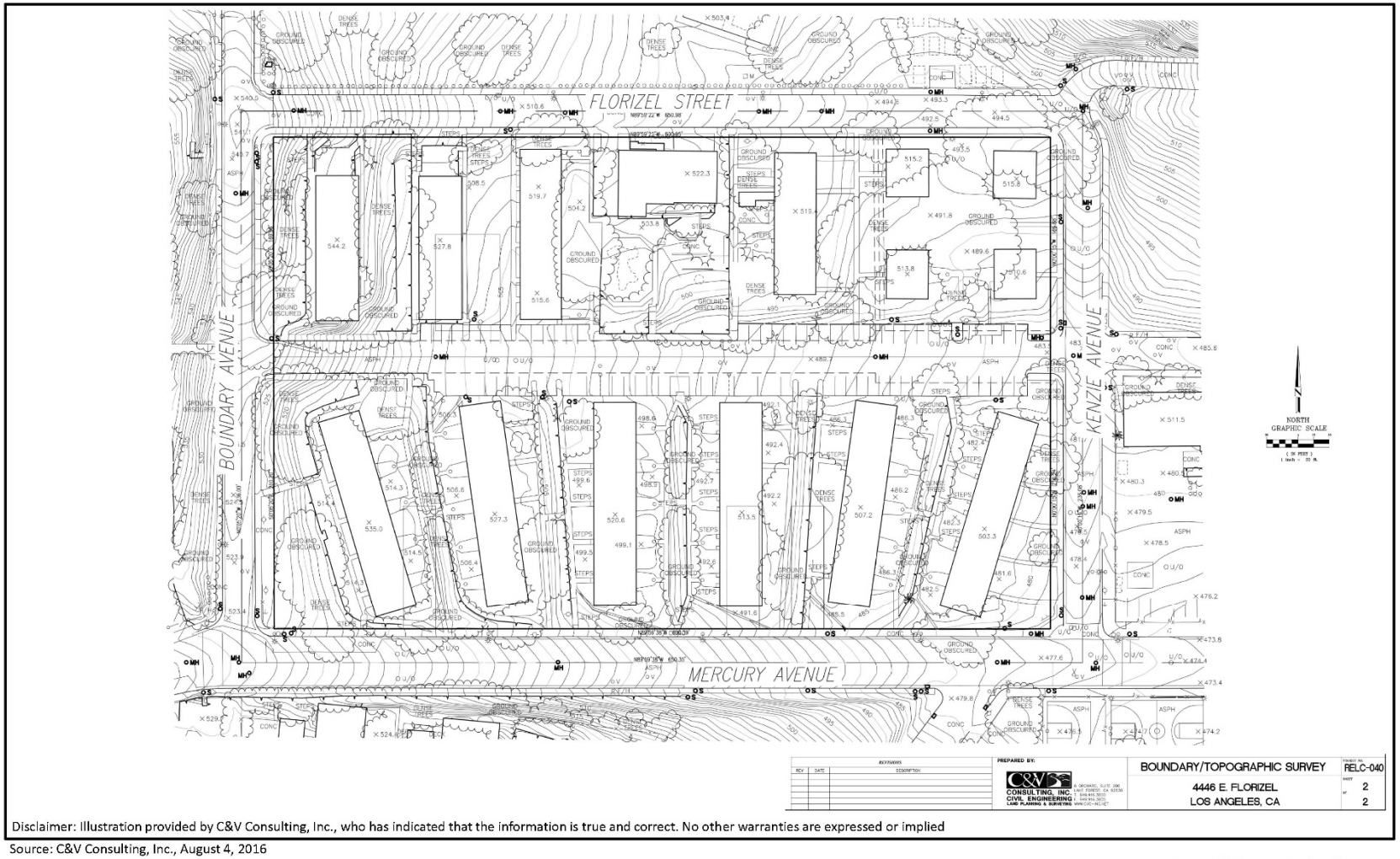


Figure 2.1-2
PROJECT LOCATION

Figure 2.2-1
TOPOGRAPHIC MAP



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Source: C&V Consulting, Inc., August 4, 2016

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Rose Hill Courts Redevelopment

Existing Topography

Figure 2.2-2
PROJECT SITE PHOTOGRAPHS

Photo 1: Mercury Avenue and McKenzie Avenue. Southeastern portion.

Photo 2: Rose Hill Court southern block of two-story buildings located on Mercury Avenue.

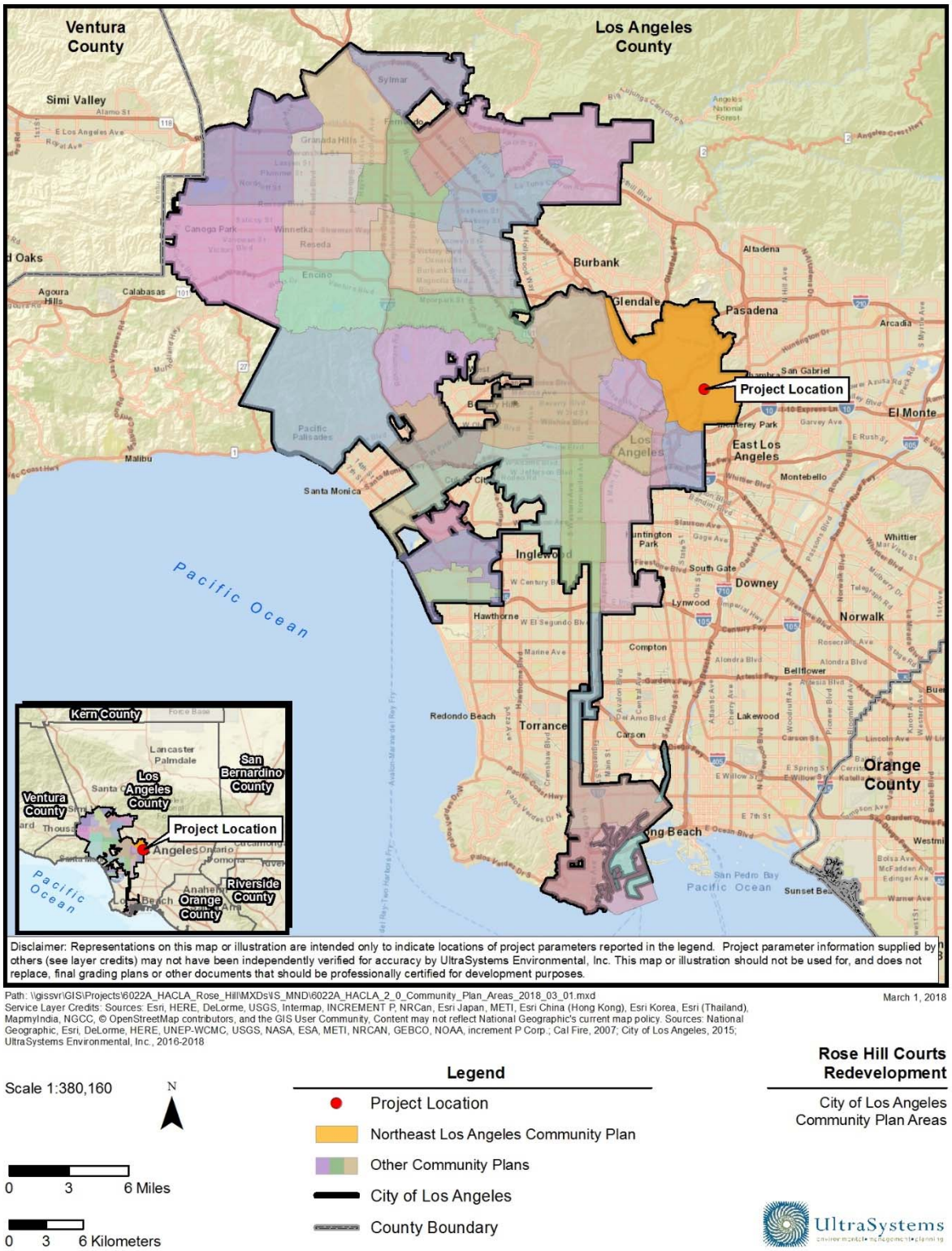
Photo 3: View of two-story buildings located on Mercury Avenue. Views of hillside developments to the east, and Florizel Street in foreground.

Photo 4: Existing trees canopy near two-story building.

Photo 5: Computer Lab Building.

Photo 6: Administrative Building on Florizel Street, in northern boundary area of the housing complex.

Figure 2.2-3
COMMUNITY PLAN AREA



From a localized perspective, Rose Hill Courts is located within the Rose Hill neighborhood. 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 north of the project site, Earnest B. Debs Regional Park is the fourth largest park in the City and hosts the Audubon Center.

2.2.2 Land Use and Zoning

The land use designations and zoning of the project site and its immediate vicinity are listed in **Table 2.2-1** and shown in **Figures 2.2-4** through **2.2-6**. As shown, the General Plan Framework Element designates the site for Low Residential (LR), while the Northeast Community Plan, adopted on June 15, 1999, contains a site-specific designation of Low Medium 1. The City's General Plan Framework Element establishes the broad overall policy and direction for the entire General Plan. It provides a citywide context and a comprehensive long-range strategy to guide the comprehensive update of the General Plan's other elements. Community Plans guide the physical development of neighborhoods by establishing the goals and policies for land use.

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 floor area ratio (FAR).

Table 2.2-1
SUMMARY OF EXISTING LAND USE AND ZONING

Location	General Plan Framework	Zoning	Community Plan	Existing Use
Project Site	Low Residential (LR)	[Q]R1-1D	Northeast Los Angeles (Low Medium 1)	Multi-Family Housing
Surrounding Areas				
North	Low Residential Open Space	[Q]R1-1D [Q] RES1D OS-1XLD	Northeast Los Angeles	Rose Hill Park (BBQ pits, baseball fields, children's play area, picnic tables) Ernest E. Debs Regional Park (large open space nature reserve and regional park)
East	Open Space/ Low Residential	[Q]OS-1XLD	Northeast Los Angeles	Vacant Land Our Lady of Guadalupe Catholic School
West	Open Space	OS-1XLD	Northeast Los Angeles	Rose Hill Park
South	Low Residential	[Q]R1-1D	Northeast Los Angeles	Single & Multi-family Residential Rose Hill Recreation Center

Figure 2.2-4
GENERAL PLAN FRAMEWORK LAND USE DESIGNATION

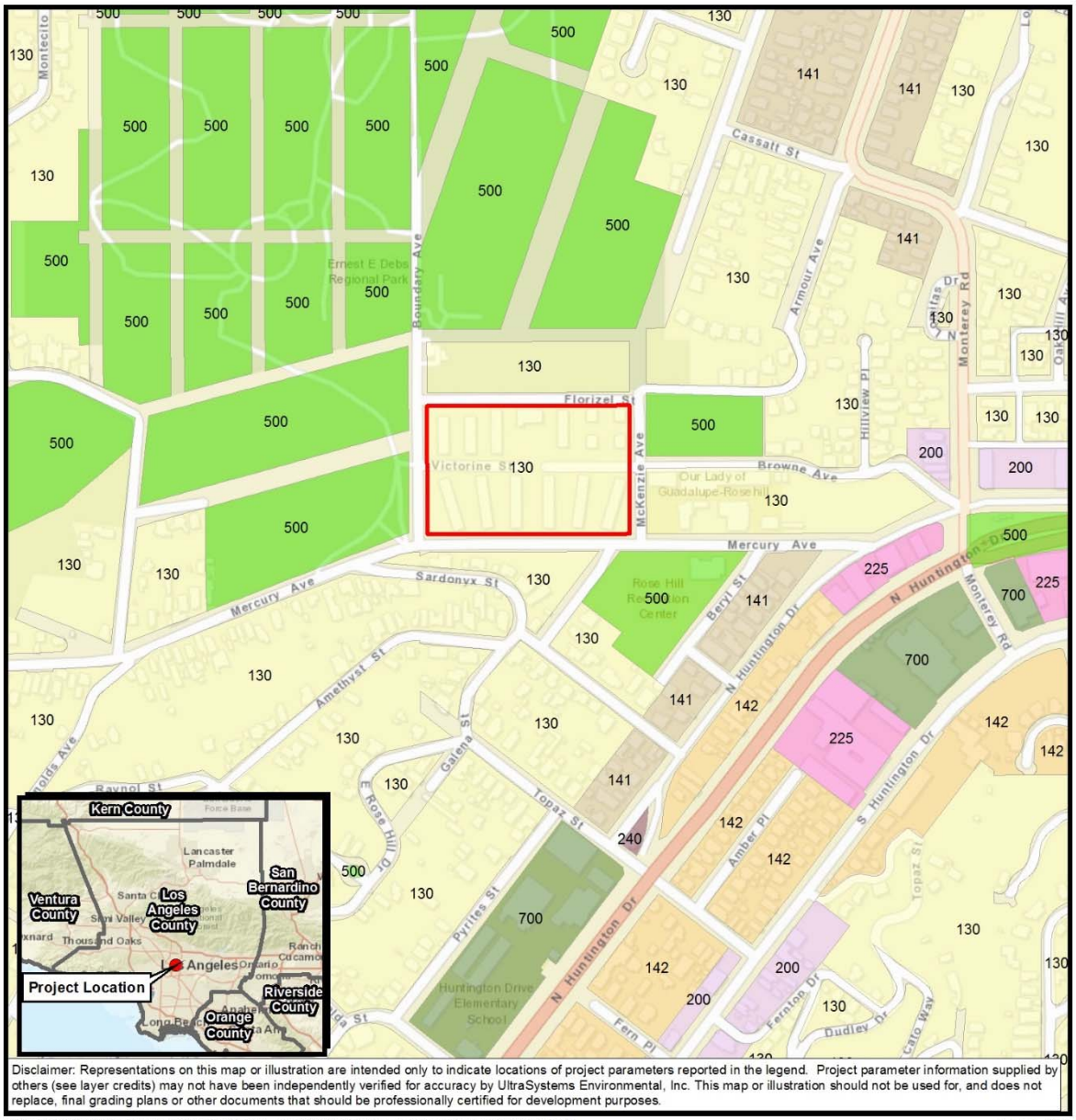


Figure 2.2-5
NORTHEAST COMMUNITY PLAN LAND USE DESIGNATION

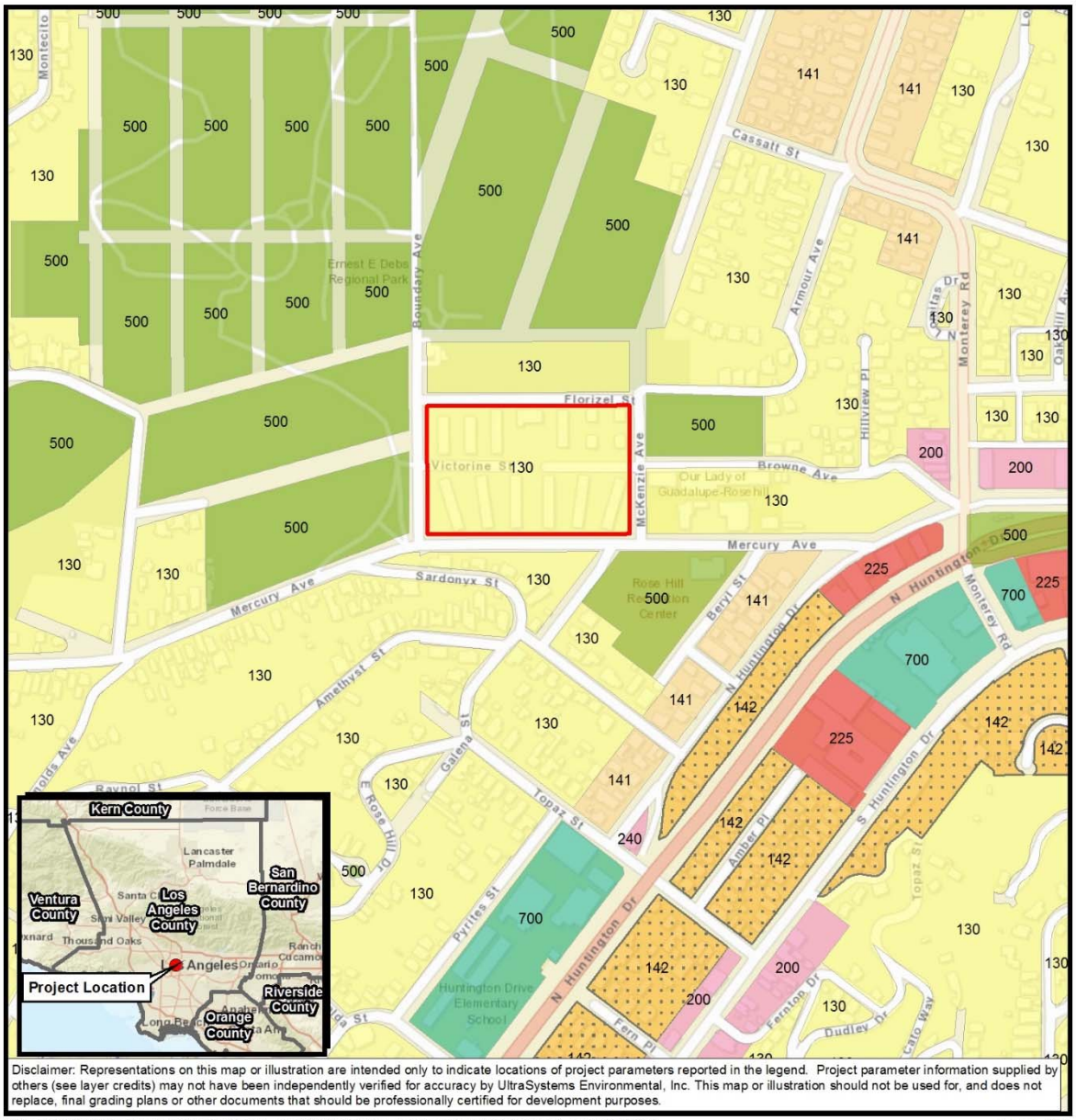
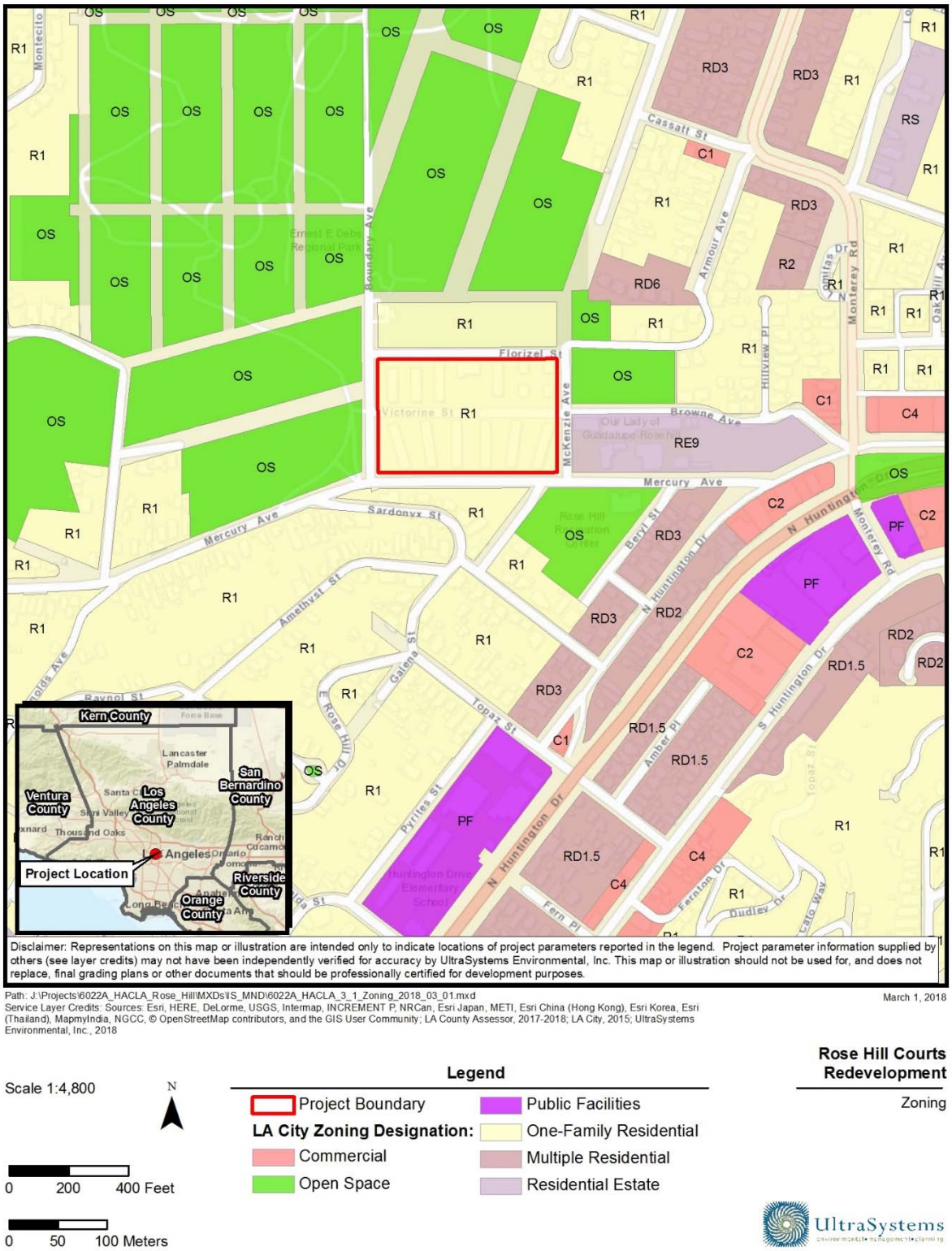


Figure 2.2-6
EXISTING ZONING DESIGNATION



2.2.3 Council District

The Northeast Los Angeles area is located within Council District 14, and served by Jose Huizar, Councilmember. See **Figure 2.2-7**.

2.2.4 Neighborhood Council

Rose Hill Courts is located within LA-32, which is a Neighborhood Council or city-certified local group comprised of people who live, work, own property or have some other connection to the neighborhood. LA-32's mission is to preserve and improve the quality of life by creating a safe, healthy, orderly and clean environment that promotes the community spirit of inclusion, cooperation, participation and collaboration in accordance with the wishes of the community through outstanding service (LA-32 Neighborhood Council, 2018).

2.3 Existing Characteristics of the Site

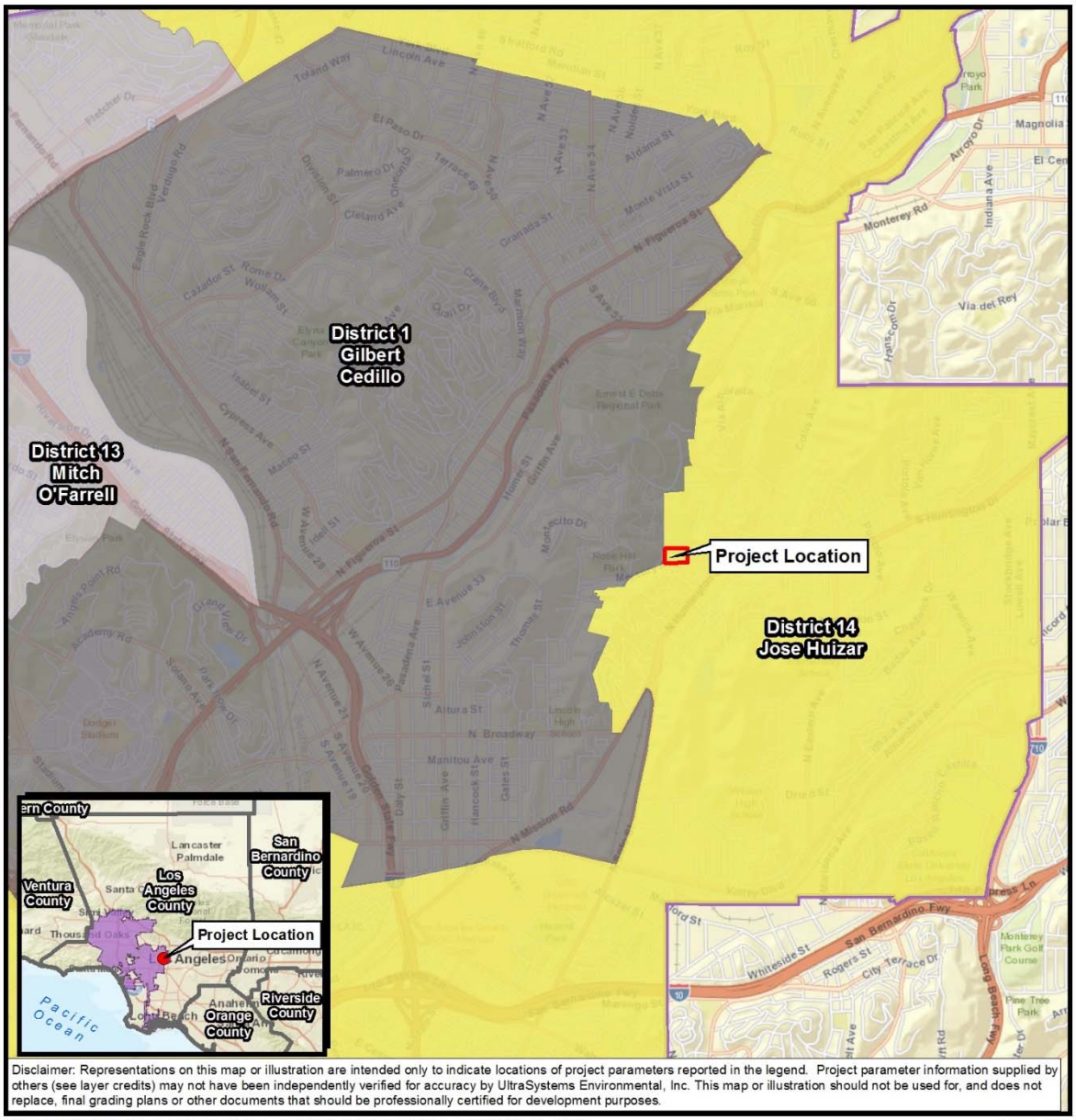
2.3.1 Climate and Air Quality

The project site is located within the South Coast Air Basin (SCAB), a 6,600-square-mile area encompassing all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. A persistent high-pressure area that commonly resides over the eastern Pacific Ocean largely dominates regional meteorology. The distinctive climate of this area is determined primarily by its terrain and geographic location. Local climate is characterized by warm summers, mild winters, infrequent rainfall, moderate daytime onshore breezes, and moderate humidity. Ozone and pollutant concentrations tend to be lower along the coast, where the constant onshore breeze disperses pollutants toward the inland valley of the SCAB and adjacent deserts. However, as a whole, the SCAB fails to meet national ambient air quality standards for ozone and fine particulate matter ($PM_{2.5}$) and is classified as a "nonattainment area" for those pollutants.

2.3.2 Geology and Soils

Locally, the project site is in the central portion of the Repetto Hills. The Repetto Hills trend northwest-southeast along the northeastern edge of the Los Angeles Basin and are composed of folded and faulted Miocene age marine sedimentary bedrock of the Puente Formation that has been uplifted and incised by elevated flood plains and uplifted alluvial valley deposits. Regionally, the site is within the Peninsular Ranges geomorphic province, which is characterized by elongated northwest-trending mountain ridges separated by straight-sided sediment-filled valleys. The northwest trend is further reflected in the direction of the dominant geologic structural features of the province, which are northwest to west-northwest trending folds and faults, including the nearby Whittier Fault Zone (Geocon, 2018, p. 2). Based on a field investigation and published geologic maps of the area, the site is underlain by artificial fill, Pleistocene age alluvial valley deposits, and Miocene age sedimentary bedrock of the Puente Formation (Ibid).

Figure 2.2-7
COUNCIL DISTRICTS



2.3.3 Hydrology

The Lower LAR Watershed encompasses approximately 43.7 square miles (27,981 acres) within Los Angeles County and comprises 5.3 percent of the drainage area of the full LAR Watershed (John L. Hunter and Associates, Inc., 2017, p. 1-9). The project site is mapped between the San Gabriel Valley and San Fernando Valley groundwater basins, though not *in* either basin. Precipitation for the watershed area is highly variable and terrain-dependent, averaging 15 inches annually and mainly occurring during the winter months (November through April) (Ibid). Due to the atmospheric dominance of the stable marine layer, significant precipitation is rare between May and October (Ibid).

2.3.4 Biology

The 5.24-acre project site is located in the foothills south of the San Gabriel Mountains within the Southern California Coast Ecoregion as classified by the United States Geological Survey (USGS), and the South Coast area of California's floristic province. The project site is best 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 B. Debs Regional Park to the north, which is the fourth largest park in the City. The park contains a mosaic of native vegetation communities such as buckwheat scrub and oak woodland and ornamental trees, shrubs, and manicured lawns. Refer to **Table 2.3-1** below, which lists the common and scientific names of the plants and trees that are located on the project site. There are no protected trees on the project site. Refer to **Appendix B** of this document for a letter from the certified arborist stating there are no protected native trees or heritage/historic trees on the project site.

Table 2.3-1
ONSITE LANDSCAPING

Common Name	Scientific Name
Tree of Heaven	*Ailanthus altissima*
Hong Kong Orchid Tree	*Bauhinia x blakeana*
Silk Floss Tree	*Ceiba speciosa*
Citrus Limon Osbeck	*Citrus limon*
Orange	*Citrus sinensis*
Laurel-leaved Snail Tree	*Cocculus laurifolius*
Carrotwood Tree	*Cupaniopsis anacardioides*
Loquat	*Eriobotrya japonica*
Tasmanian Bluegum	*Eucalyptus globulus*
Weeping Fig	*Ficus benjamina*
Common Fig	*Ficus carica*
Majestic Beauty Evergreen Ash	*Fraxnius uhdei*
Blue Jacaranda	*Jacaranda mimosifolia*
Korean Privet	*Ligustrum sp.*
White Mulberry	*Morus alba*
Olive	*Olea europaea*
Avocado	*Persea americana*
Monterey Pine	*Pinus radiata*
Kōhūhū	*Pittosporum tenuifolium*

Common Name	Scientific Name
London Planetree	*Platanus x hispanica*
Holly-leafed Cherry	*Prunus ilicifolia*
Evergreen Pear	*Pyrus kawakamii*
Cork Oak	*Quercus suber*
Mallet Flower	*Schefflera pueckleri*
California Peppertree	*Schinus molle*
Queen Palm	*Syagrus romanzoffianum*
Tipu Tree	*Tipuana tipu*
Chinese Elm	*Ulmus parvifolia*
Mexican Fan Palm	*Washingtonia robusta*

2.3.5 Public Services and Utilities

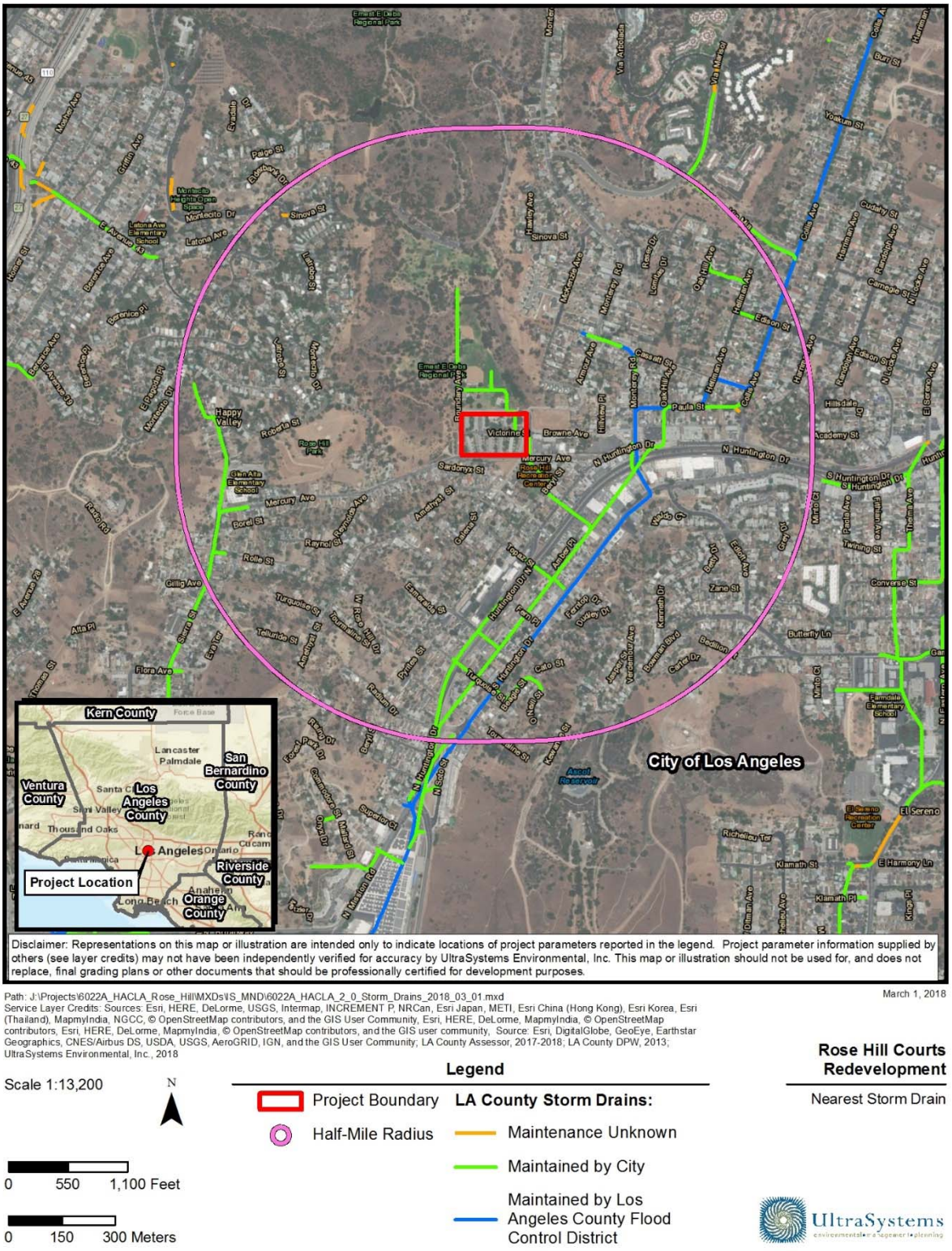
The City is served by a full range of public services and utilities. The Los Angeles Unified School District (LAUSD) is responsible for providing public educational facilities in the City, including the project site. Police services and fire protection services and facilities are provided by the City of Los Angeles Police Department and Los Angeles County Fire Department, respectively. Recreation and open space amenities in the City are provided by the City through a variety of public parks and open space areas that are operated and maintained by the City's Department of Parks and Recreation.

The majority of the City receives domestic water service from the Los Angeles Department of Water and Power (LADWP). The Department of Public Works' Bureau of Sanitation (BOS) owns and operates the City's sanitary sewer system and is also responsible for providing sewer service to this area of the City via backbone collection and conveyance system. The City also maintains storm drainage collection and conveyance facilities; major flood control facilities are maintained by the Los Angeles County Flood Control District (LACFCD), refer to **Figure 2. 2-8**.

The City contracts with a private waste hauler to collect and dispose of the solid waste generated by commercial and multi-family residential developments in the project vicinity, which is collected and transported to the Sunshine Canyon Landfill, which is operated and maintained by Republic Services. Electrical service to the site is provided by LADWP through a grid of transmission lines and related facilities. Natural gas is provided by Southern California Gas Company (SoCalGas), which maintains a local system of transmission lines, distribution lines and supply regulation stations.

The City of Los Angeles Bureau of Engineering oversees the maintenance of the City's storm drainage system, which is designed to mitigate 50-year magnitude storms. The project site is well-developed and contains a mix of impervious surfaces, including asphalt and concrete, as well as porous surfaces, including landscaping. Storm water runoff generated on the project site is collected and conveyed by curbs and gutters to an existing 30-inch reinforced concrete pipe located within the adjacent roadway right of way.

Figure 2.2-8
NEAREST STORM DRAINS



2.3.6 Population and Income

According to the 2010 U.S. Census (U.S. Census Bureau, 2010), the project site is located within Census Tract 2013.01. As noted within **Table 2.3-2** and **Figures 4.13-1** and **4.13-2**, the project is located within a census tract that has a high minority population. Census tract 2013.01, where the project is located, has a population of 3,633 residents, and 76 – 100 percent of the tract is inhabited by persons of Hispanic or Latino origin. In addition, as noted in the table below, the areas surrounding the project site also have large minority populations.

Table 2.3-2
CENSUS TRACT INFORMATION

Census Tract	Percent (%) Hispanic or Latino Origin	Percent (%) Minority Population Based on Race	Percent Below Poverty Level
2013.01 Project Site Location	76 – 100%	50 – 75%	N/A
2014.01	76 – 100%	50 – 75%	N/A
1991.10	76 – 100%	25 – 49%	22 – 100%
1992.02	76 – 100%	50 – 75%	N/A
1993	51 0 75%	50 – 75%	N/A
2012	76 – 100%	25 – 49%	22 – 100%
2013.02	25 – 50%	50 – 75%	N/A

As of August 2018, there are 220 residents living at Rose Hill Courts.[1] For those residents, the following Household Area Median Income (AMI) breakdown is provided in **Table 2.3-3**, below. The table also provides unit counts and specific household income categories and defines area median income (AMI).

1 Email correspondence between the Housing Authority of Los Angeles and UltraSystems on September 4, 2018

Table 2.3-3
HOUSEHOLD AREA MEDIAN INCOME LEVELS BY UNIT

Units	Household Income Category	Household Area Median Income Definition[1]
64	Extremely Low-Income	The Extremely Low-Income limits is calculated as 60 percent of the very low-income limits and compared to the most recent update to the Federal Poverty Guidelines. If the poverty guidelines are higher, those values are chosen. The value is capped at the Very Low-Income level.
17	Very Low-Income	The maximum Very Low-Income limit typically reflects 50 percent of HUD's median family income (MFI) figure generally equals two times HUD's 4-person very low-income limit, except when HUD applies adjustments. HUD may adjust income limits for an area or county to account for conditions that warrant special considerations, referred to as exceptions.
9	Low-Income	In general, maximum income for low-income households reflects 80% of MFI level.
1	Over AMI	Over 80% Area Median Income
9	Vacant Units	Not Presently Occupied.
100		

1 Department of Housing and Community Development, 2017. Division of Housing Policy Development. 2015 State Income Limits Briefing Materials for 2017. http://www.hcd.ca.gov/grants-funding/income-limits/state-and-federal-income-limits/docs/inc2k17.pdf February 20, 2018. Information regarding household income and AMI levels for the existing Rose Hill Courts is from email correspondence between the Housing Authority of Los Angeles and UltraSystems on September 4, 2018.

3.0 PROJECT DESCRIPTION

3.1 Project Background

The project site is currently developed as the Rose Hill Courts apartment complex, which is owned by HACLA. HACLA was chartered by the State of California in 1938 to alleviate housing shortages, and to eradicate substandard housing and improve housing quality. 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 apartments at Rose Hill Courts offer one, two, three and four-bedroom units for residents. Completed in 1942, Rose Hill Courts is among the oldest public housing projects in Los Angeles. It was designed in the garden apartment style by the design team of Rose Hills Architects, which consisted of architects William F. Ruck and Claud Beelman, along with landscape architect Hammond Sadler.

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). Rose Hill Courts is eligible for listing on the National Register of Historic Places. Refer to the Cultural Resources section of this document for details, which discusses historical resources.

The existing building heights for the Rose Hill Courts complex are as follows:

- Community Building: 1-story, approximately 13 feet
- Townhouses/Stacked Flats: 1-story, approximately 12 feet
- Townhouses/Stacked Flats: 2-stories, approximately 17 feet

Currently, the Rose Hill Courts 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. Window openings are generally stacked vertically (Ibid., p. 8).

Over the years several alterations and modifications to the apartment complex have occurred, including the installation of entrance hoods, window replacements, kitchen modernizations, roof replacement, installation of security doors and smoke detectors, Americans with Disabilities Act (ADA) ramp improvements, and structural repairs due to age. Additionally, a children's playground area that includes concrete picnic tables and outdoor grills was added for residents' use and enjoyment (Ibid., p. 13-14). Existing landscaping onsite consists of grassy open areas with mature trees and shrubs, as well as concrete planters (Ibid., p. 12).

3.1.1 Garden Apartment Complex Style

Garden apartment complexes were planned and constructed in Los Angeles between 1937 and approximately 1955. These apartments generally consisted of concentrations of similar multi-unit buildings situated on large and often irregularly shaped properties. Nearly all of these apartments included a property management and maintenance office, recreational facilities, laundry rooms and drying yards, and in some cases, educational and child care facilities.

Characteristics of the Garden Style (Architectural Resources Group, 2012, p. 3) public housing components include:

- Multi-acre sites.
- Use of superblocks.
- Low-slung buildings, rarely exceeding two stories in height.
- Primary building entrances face common courtyards rather than the street.
- No parking or parking at the perimeter of the site plan, typically in surface parking courts.
- One or more large open spaces, or greens, located at the interior of the site.
- Recreational amenities planned to help foster community.

From 1941 through 1942, 16 public garden apartment complexes were constructed by the City and County Housing Authorities of Los Angeles, creating approximately 9,000 housing units (Ibid). The construction of these garden apartment communities was designed to fit into the proposed Master Plan for the City of Los Angeles at the time, which emphasized sub-urban, low-density neighborhoods.

3.1.2 Existing Condition of Rose Hill Courts Buildings

Rose Hill Courts was constructed in the 1940s, during a time when asbestos and lead based paint were used in construction materials. Altec Testing and Engineering, Incorporated (Altec) preformed an updated Phase I Environmental Site Assessment (ESA) of the project site in 2018 and found potential Recognized Environmental Conditions (RECs), including lead in soil, and lead in the drinking water, as well as asbestos containing materials, lead based paint, and indoor radon gas. Refer to **Section 4.8** of this document for additional information.

The existing buildings at Rose Hill Courts have significant capital needs due to their age (75 years). Due to the property's extensive termite infestation and damage to the existing structures, with the infestation extending to the subterranean level, foundation walls, piers and plumbing pipes, and other structural repair needs, HACLA selected Related California as its development partner to evaluate the viability of both new construction and historic preservation, options. After several months of intensive study and evaluation, Related recommended to HACLA staff and HACLA Board members in October 2015 to move forward with a substantial rehabilitation option for the site. This determination was made based upon initial feasibility studies and following extensive public outreach to the existing Rose Hill Courts residents and the surrounding community, as described below.

Upon further consideration, it was determined that the historic preservation option would not maximize the project site's potential to provide needed affordable housing. Therefore, the project proposes to demolish the existing onsite structures and build new affordable housing units on the project site. The project has been designed to maximize use of the land and develop a residential

complex that allows all existing residents the right to return to the project site, should they elect to do so. Additionally, the project has been designed for ease of accessibility to residents and with a goal of increasing the number of affordable housing units on the project site compared to existing (August 2018) conditions.

3.1.3 Community Outreach and Participation

The following information depicts the resident and community outreach that has occurred regarding the Rose Hill Courts project. Between 2014 and 2016 Related had considered development options that included rehabilitation and demolition with new development. Ultimately, as described below, the project (Year 2018) includes demolition of onsite structures and redevelopment of the project site.

YEAR 2014. HACLA conducted five meetings with the Rose Hill Courts Resident Advisory Committee (RAC) and tenants from May through November 2014. At these meetings, tenants were informed about the existing physical conditions, the extent of termite damage onsite, and progress updates and steps HACLA had been taking.[2] From a health and safety standpoint, HACLA informed the residents that it would take the following steps and procedures, including: (1) monitoring and treating (as necessary), all occupied units and buildings; and (2) vacant and damaged units deemed uninhabitable would not be leased out. Only 10 units were considered uninhabitable, due to extensive termite damage. If the modernization option (see below) were chosen, these units would be improved so that they could be occupied.

The following potential long-term options and solutions were also discussed with the residents:

1. Comprehensive Modernization – Rehabilitation;
2. Demolition and redevelopment of the project site with new construction;

Residents were informed that these options might require temporary or permanent relocation and that the residents would be provided relocation assistance per federal and state regulations. Residents were informed of HACLA plans to secure an experienced development partner (Related California was ultimately chosen) who will work with HACLA and the community to determine the most feasible solution with respect to the Rose Hill Courts complex. Residents were also informed that HACLA would continue to solicit resident feedback, inform them about the development process, and have a participatory dialogue with them throughout the development process.

Resident Feedback and Comments. Although all the residents were invited, tenant participation ranged from 30 to 35 residents at the initial RAC meeting, with a smaller group of 10-13 residents participating at the latter two meetings. Tenants were generally supportive of HACLA efforts and believed that the site was in dire need of improvements. Many residents voiced support for tearing down and rebuilding the entire complex. Tenants had questions about relocation; specifically, how and where they might be relocated, and whether any assistance will be provided. Long-tenured senior residents expressed their interest in continuing to remain within the neighborhood during relocation. Some residents asked about how this might affect families, especially those with children

2 Simultaneous Spanish and Vietnamese interpretation services were provided at each tenant meeting. In addition, all HACLA and Related California documents presented at these meetings, aimed at informing residents about the improvements to Rose Hill Courts project. All information was provided in English, Spanish, and Vietnamese.

in local schools. Others were worried about leaving and not being able to return once the construction work was finished at the complex.

In November 2014, HACLA discussed with residents that short-term termite control measures were being undertaken. Residents were also provided an update on the developer procurement process, and the next steps.

At this meeting, community members were interested in understanding how the community and HACLA residents would be included in further discussions. These members also requested that HACLA link up the park and playgrounds (open space) that currently exist on both sides of the project site, and potentially develop sports facilities, an indoor soccer field, computer lab, and other amenities for residents and the community. They also suggested that HACLA could acquire a parcel of land across Huntington Boulevard, to move and re-house many of the existing residents. They also want to see more senior-related housing and facilities on the Rose Hill Courts site.

YEAR 2015. During the first half of the year, HACLA and Related met with tenants on five different occasions. Two meetings occurred with the RAC, two meetings were open to all residents, and one meeting occurred to provide information to Vietnamese-speaking residents. The two open meetings were attended by approximately 20 residents and 35 residents, respectively.

Resident Feedback and Comments. In June 2015, Related provided a written survey to Rose Hill Courts residents; 36 surveys were completed. The most important findings were:

- 87 percent of the residents have lived at the complex for 10 years or more.
- Affordability, access to transportation, surrounding community, and convenience were cited by residents as reasons why they like living at the complex.
- Almost all of the respondents indicated that they would like to return to the complex, after demolition, new construction, and/or rehabilitation has been completed.

In late 2015 and after extensive study, HACLA and Related decided on the substantial rehabilitation option. Rose Hill residents were informed of the decision at a tenant meeting held on October 6, 2015, with preliminary information about the estimated scope and timeframe. On December 1, 2015, HACLA and Related representatives provided similar information to staff at the Council District 14 field office.

YEAR 2016: Design Charrette for the Residents. The first design charrette with tenants and community members was held on January 21, 2016. This charrette created an opportunity for community members to let HACLA and Related know what type of improvements and amenities they wanted to see, once the rehabilitation process was completed.

Key Stakeholder Meetings. During the spring of 2016, outreach was conducted by HACLA and Related, and focused on informing key stakeholder groups within the community about the substantial rehabilitation, the rationale for selection of this alternative, and to discuss the preliminary scope of work that would be conducted by Related. This outreach included meetings with the Arroyo Seco Neighborhood Council; LA32 Neighborhood Council; Council District #14 field office, and the Rose Hills Homeowners Association.

Another design charrette was held on June 29, 2016. This meeting had 55 residents and community members in attendance. The meeting was an opportunity to receive feedback on the preliminary site

plan. Many of the comments received reiterated the previous feedback that HACLA obtained during its January 2016 design charrette meeting.

A resident meeting was conducted on October 19, 2016 by HACLA at the apartment complex. This meeting focused on the temporary relocation of the tenants during the rehabilitation work at the complex.

Year 2017: **Transition of Redevelopment Strategy from Substantial Rehabilitation to Complete Demolition and New Construction.** In January 2017, Related and HACLA took residents and RAC members on a site tour of Harbor Village. Harbor Village is a former public housing site that has been jointly redeveloped into an affordable mixed-income community by HACLA and Related. The tour was a chance for residents to tour a previously converted public housing site and to see how Related manages the site. It was important for HACLA and Related to demonstrate to residents how things will be different under different ownership and management. The residents met with the management staff, the social service provider over lunch and later toured some of the units. The Rose Hill Courts residents also had good conversations with current Harbor Village residents who were returning tenants from the former Normont Terrace public housing site. The returning residents spoke about their experiences living in the new community and relocation benefits they received when they were displaced by the demolition and during the recent rehabilitation of the site.

In the 2nd quarter of 2017, Related and HACLA entered more detailed discussions regarding the scope of the substantial rehabilitation of Rose Hill Courts. Based on the scope of rehabilitation and the existing RHC resident population, it was revealed that many residents would not be able to return to their rehabilitated units due to HUD's rightsizing regulations. Right-sizing requires that residents who temporarily relocate must be permanently located in a unit based on their actual family size. Many RHC residents are living in units that are either too large or too small and based on the existing unit mix. Therefore, under the rehabilitation scenario, many families would not be eligible to return. HACLA's policy is for every resident to have the right to return so this became a big issue. In addition to the right-sizing issue, there is the soaring need for affordable housing in Los Angeles. With the site currently having mostly 2-story buildings and very low density, HACLA and Related believed there was an opportunity with new construction to increase the density which would: 1) solve the right-sizing issue and 2) provide an opportunity to increase the housing units.

In July, Related and HACLA met with the residents to discuss a summary of the redevelopment progress thus far, share the results of the resident survey and discuss redevelopment ideas with an indication toward switching from rehabilitation to new construction. The resident response was favorable toward new construction but their biggest concerns remained when the project will happen and relocation. In the ensuing month, HACLA and Related met with the City and key stakeholders to gauge support for a new construction approach. In the fall of 2017, with both HACLA staff and Related fully behind the strategic switch to the new construction, HACLA's Board agreed to the change.

In December 2017, Related and HACLA met with residents to discuss the formal strategic change to new construction. Residents were given a Fact Sheet that provided a high-level overview of the new construction approach and the steps that would need to be taken in the process. Related and HACLA informed the residents of the January 2018 meeting to discuss the proposed concept plan and get resident feedback in a charrette format.

Year 2018: **Stakeholder Feedback for New Construction Concept Plan**. The year began with a design charrette that gave residents a first look at the proposed new construction concept and

provided a forum for residents to give feedback. The meeting was hosted by Related and HACLA along with lead architect, Withee Malcolm. Withee Malcom presented an overview of the proposed redevelopment by using a 3D flythrough video to communicate the scale and context of the project's vision. Residents were then broken out into six groups, each led by a facilitator, to discuss their specific likes and dislikes and to provide suggestions regarding the project's architectural direction and preliminary conceptual site plan.

Exterior Architectural Concepts. Overall, residents seemed to support the architectural options presented by the design team. Two different architectural styles (represented by six different images) for Craftsman/Bungalow and Organic/Modern were presented to residents. Residents were provided with green stickers to place on images they liked and red stickers to place on images they disliked. Out of the collective responses Craftsman/Bungalow images received 44 likes and 10 dislikes. Organic/Modern received 58 likes and 36 dislikes.

Conceptual Site Plan. Overwhelmingly, residents were very excited and supportive of the new construction site plan. Residents provided a list of recommendations for the team to incorporate into the design process and future operation of the redevelopment. The main areas of emphasis from residents included in-unit amenities, accessibility, acoustics, lighting, parking, building design, security, recreation and community/social service programs. The top in-unit amenities included larger bedrooms and bathrooms, more storage space, sound proofing between floors/walls, and in-unit washer/dryer. The top site plan recommendations included requesting for the design of buildings, open space and parking areas to be adequately secured, fitness, recreation, and community gathering spaces in the open space areas, and assigned, accessible parking. Additionally, many residents inquired about the timing of the start and completion of Phase I. Residents' main concerns were in regard to relocation, site security, unit right-sizing/overcrowding and outsiders' parking onsite.

In March 2018, Related/HACLA hosted an open house for current residents and the broader neighborhood to share more information about the project. The turnout included a mixture of residents and community members. The team used a combination of boards of the existing conditions, concept plan and architectural concepts along with the 3D flythrough video to communicate the vision for the redevelopment. Overall the meeting went well with very positive support and detailed feedback from the both residents and the community. Similar to the resident design meeting, the majority of the feedback centered on timing, security, future in-unit and community amenities, parking and architectural design. There were a few people concerned about the proposed density, height of mid-rise buildings, Phase I parking, relocation and the mixing of seniors/families in mid-rise buildings.

In addition to the meeting with the residents and community, Related and HACLA have met with stakeholders to garner feedback and build support. Stakeholders have included CD14, representatives from LA32 Neighborhood Council and leadership from other local organizations, El Sereno Historical Society and LA Conservancy.

3.2 Project Overview

Based on extensive outreach to the residents and the community, the project at Rose Hill Courts will demolish all the existing buildings and construct a total of 191 affordable housing units along with a property management and maintenance office on site, in two phases. The components of the project are listed below in **Table 3.2-1** and conceptually depicted in **Figure 3.2-1**.

Table 3.2-1
PROJECT SUMMARY

Address	4446 Florizel Street Los Angeles, CA 90032
Assessor's Parcel Number	5305-011-900
Approximate Acreage	5.24
Phase I Units	94
Phase II Units	97
Total Number of Units	191
Lot Coverage	Approximately 32 percent
Floor Area Ratio	Approximately 1.3
Total Number of 1-bedroom/1-bathroom units	102
Total Number of 2-bedroom/ 1-bathroom units	61
Total Number of 3-bedroom/2-bathroom units	20
Total Number of 4-bedroom/2-bathroom units	8
Property Management and Maintenance Office	+/- 4,500 square feet
Approximate acreage of landscaping/open space	Open space and landscaped area: 128,200 sq. ft. Walkways: 20,000 sq. ft. Drive/Parking areas: 46,000 sq. ft. Note: open space area overlaps with landscaped and walkway area.
Building Height	Phase I: Mid-rise 4 stories, 50 feet Phase II: Mid-rise 4 stories, 50 feet Property Management and Maintenance Office: 1-2 stories, 20 feet Townhouse/Stacked Flats: 2-3 stories, 30 feet
Density	191 units on a 5.24-acre site equates to approximately 36.45 dwelling units per acre
Total Number of Parking Spaces	176

Source: Withee Malcolm Architects, 2018. Composite Site Plan dated January 30, 2018.

3.3 Open Space and Recreational Amenities

Several courtyards are proposed on site, each with a unique design theme and use. Outdoor space adjacent to the community building 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, and experiential play elements that encourage interaction and group play. The landscape design would create a park-like setting for residents.

Figure 3.2-1
ROSE HILL COURTS SITE 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, January 2018

UltraSystems
environmental•management•planning

Rose Hill Courts Redevelopment

Site Plan

3.4 Exterior Lighting

The project will have exterior lighting that will be located on the buildings in addition to street, sidewalk and pathway lighting located across the entire site.

3.5 Fencing

Project fencing would be located between buildings. Courtyard areas 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.

3.6 Security

The site will have security features including: cameras, controlled access to mid-rise buildings, and potentially controlled access to some of the parking areas.

3.7 Architectural Design, Building Facades, and Rooflines

The architectural plan is based on creating a development with multiple building and unit types with shared amenities. The project would consist of two phases, the first phase will comprise two 4-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, cement fiber board siding, and material and color accents.

Phase-Two would be comprised of building types of varying scale and architectural detailing. Buildings B3 and B4 would be two-story townhouses wrapping around a two-level concrete parking garage with dedicated parking for buildings B3, B4 and B5. Buildings B6 through B13 would be two-story townhouses and flats with tuck-under parking. The architectural style for building B5 would be California Contemporary with flat parapet roofs, cement fiber board siding, and material and color accents. The architectural styles for buildings B3, B4 and B6 through B13 would be California Contemporary Farm House with pitched roofs, gable ends, horizontal siding, vertical board/batten siding, window trim, planter boxes and base details.

3.8 Landscaping

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 fire retardant due to the sensitivity of fire hazard in the area. Plant selections are based on their, aesthetic/horticultural value, durability, water use, and low maintenance. Trees such as Sycamore, Oaks Palo Verde, Mesquite, Western Redbud, Strawberry Tree, Desert Willow, Australian Willow, African Sumac, Palms, and Crape Myrtle. would be utilized on site due to their low water use, and fire-retardant characteristics.

Water efficient 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 meet and exceed the City of Los Angeles Landscape Ordinance.

Water delivery systems have been designed in conformance with Hydrozone requirements for water conservation and in compliance with the City's Landscape Ordinance and California Water Efficient Landscape Ordinance AB 1881.

3.8.1 Parking and Circulation

A total of 176 parking spaces will be provided onsite. The 176 proposed parking spaces equates to 0.92 spaces/unit overall, with 8 spaces designated for the property management and maintenance office. Phase I will have 50 spaces, which equates to 0.53 parking spaces per unit. Phase II will have 126 spaces, which equates to 1.29 parking spaces per unit. The project would not meet normal Los Angeles Municipal Code requirements but would be AB 744 requirements.

The project proposes access points into the complex from three driveways along Florizel Street, one driveway along Boundary Avenue, one driveway along Mercury Avenue, and one driveway along Mackenzie Avenue. The existing driveway, which currently runs east-west through the project site would be removed with development of the project.

3.8.2 Utilities

Sanitary Sewer. Sewer service to the project site is provided by the City of Los Angeles. The Department of Public Works' BOS owns and operates the City's sanitary sewer system and is also responsible for providing sewer service to the City via backbone collection and conveyance system. The site is served by an existing sanitary sewer network.

Domestic Water. 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 accommodate the project.

Dry Utilities. Natural gas and electricity are provided to the project site by the SoCalGas and the LADWP. Offsite mainline electrical or natural gas improvements may be necessary within the street right-of-way to accommodate the project.

3.8.3 Catchment Basins

The existing site conditions and drainage infrastructure includes: one (1) curb catch basin along Florizel Street (some 100 feet west of Mackenzie Avenue); two (2) catch basins along the existing driveway (at Mackenzie Avenue), and two (2) curb catch basins at the site's southeast corner (along Mercury Avenue and Mackenzie Avenue). The project grading/drainage design intends to re-use these existing catch basin features and/or possibly replace with new basin structures in similar locations. The existing site's general drainage pattern (from northwest to southeast) will not change with the new onsite improvements; and as such, existing street drainage scheme will not be significantly altered. The project's onsite improvements would include a LID/SUSMP Best Management Practices (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.

3.8.4 Signage

The project proposes various types of signage in a host of locations, such as the exterior and interior of buildings, along sidewalks and pathways, and in parking areas. Signs will be oriented for both pedestrian and vehicular traffic. The design of the signage will range from uniformly recognized

traffic signs to custom signage for each building that will reflect the selected architectural style and exterior colors.

3.8.5 Construction Activities and Phasing

3.8.6 Relocation Plan

Before any tenant 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 in those units within the footprint of Phase 1, who wish to return will be temporarily relocated until construction of the buildings is 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 the Board of Commissioners and HUD, prior to any development at a 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 the 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 and permanently relocate from Rose Hill Courts, full relocation assistance for permanent replacement housing will be available.

3.8.7 Demolition

All of the existing buildings on site are scheduled to be removed. Demolition would occur in two phases as follows: in Phase I, 7 buildings are scheduled to be demolished. In Phase II, 8 buildings will be demolished.

3.8.8 Hazardous Material Removal

Hazardous materials exist on the project site, including lead in the soil, lead based paint (LBP), asbestos containing materials (ACMs), lead in the drinking water, and radon gas. Refer to **Section 4.8** of this document for a discussion of hazardous materials.

3.8.9 Grading

The existing grading will be modified to adapt to the design of the new buildings, parking areas, landscape and outdoor amenities.

3.8.10 Utilities Installation

Upon review of existing utilities and anticipated utilities in the new buildings, a utility plan will be developed in consultation with the project's utility consultant and the local service providers for wet and dry utilities.

3.8.11 Construction Activities

Construction activity will range based on the type of buildings and site work required per phase. Phase I will consist of the construction of two, 4-story midrise buildings totaling 94 units and a surface parking area. Phase II will consist of a combination of one, 4-story midrise building, and numerous townhouses and stacked flats totaling 97 units along with a 1-2 story property management and maintenance office, surface-level parking areas and a partial subterranean parking structure. Project work force will vary based on the scheduled activities to over 100 at peak with a projected average of 40-60 workers per day.

3.8.12 Offsite Improvements

As part of the project it is anticipated that offsite utility improvements will need to be made 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 projects site: Florizel Street, Boundary Avenue, Mackenzie Avenue, and Mercury Avenue. Offsite improvements will include trenching and installation of additional utility lines and pipes to provide additional water, sewer, and electrical service to the project site.

3.8.13 Equipment During Construction

A wide variety of construction equipment will be used onsite to support the necessary construction activities. The site conditions will determine necessary equipment for each phase. Dirt moving equipment, trenching, digging equipment, backhoes and skip loaders will predominate the initial work. All-terrain fork lifts, and possibly small cranes will be utilized to feed and build the project when vertical construction commences.

3.8.14 Alternatives

At this time, it is anticipated that the following alternatives will be analyzed in the EIR/EIS to be prepared for the project:

(1) No Project/No Action Alternative;
(2) Non-Historically Compliant Rehabilitation Alternative; and
(3) Historic Rehabilitation Alternative

- **No Project/No Action Alternative.** 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.

- **Non-Historically Compliant Rehabilitation Alternative.** This alternative would redevelop the existing units at Rose Hill Courts but not in a way that would preserve their historic integrity. 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.

- **Historic Rehabilitation Alternative.** This alternative would redevelop the existing units at Rose Hill Courts in a way that would preserve their historic integrity of the buildings. 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.

3.9 Discretionary Action

Following Lead Agency approval of the IS (see **Section 1.0**), the permits and approvals listed in **Table 3.9-1** below would be required prior to construction. On November 29, 2017, HACLA and the City of Los Angeles entered a Memorandum of Understanding designating HACLA as the lead agency and the City of Los Angeles a responsible agency for the project.

Table 3.9-1
PERMITS AND APPROVALS

Agency	Permit or Approval
Housing Authority of the City of Los Angeles (HACLA)	• Approval of Disposition and Development Agreement • Discretionary approval of Relocation Plan for Residents • Certification of the EIR/EIS
City of Los Angeles	• Demolition and Building Permits • Public Benefit Project with Alternative Compliance (PUB) under Los Angeles Municipal Code Section 14.00B • Affordable Housing Density Bonus (SB 1818) as identified in LAMC Section 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)
United States Department of Housing and Urban Development	• NEPA Part 58 Compliance • Section 18 Demolition and Disposition of existing Rose Hill Courts • Rental Assistance Demonstration (RAD) Conversion • Adoption of the EIS

4.0 ENVIRONMENTAL CHECKLIST

Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" or as a "Potentially Significant Unless Mitigation Incorporated," as indicated by the checklist on the following pages.

☒ Aesthetics	☒ Greenhouse Gas Emissions	☒ Population and Housing
☐ Agriculture and Forestry Resources	☒ Hazards and Hazardous Materials	☒ Public Services
☒ Air Quality	☐ Hydrology and Water Quality	☒ Recreation
☒ Biological Resources	☒ Land Use and Planning	☒ Transportation and Traffic
☒ Cultural Resources	☐ Mineral Resources	☒ Tribal Cultural Resources
☒ Geology and Soils	☒ Noise	☐ Utilities and Service Systems
		☒ Mandatory Findings of Significance

Determination (To Be Completed by the Lead Agency)

On the basis of this initial evaluation:

☐ I find that the project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☒ I find that the project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the project, nothing further is required.

Signature	9/19/2018 Date
Jenny Scanlon	Housing Authority of the City of Los Angeles

Evaluation of Environmental Impacts

(1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors, as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

(2) All answers must take into account the whole action involved, including offsite as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

(3) Once the lead agency has determined that a particular physical impact may occur then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

(4) "Negative Declaration: Less than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less than Significant Impact." The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to less than significant level.

(5) Earlier analyses may be use where, pursuant to the tiering, Program EIR, or other CEQA process, an affect has been adequately analyzed in an earlier EIR or ND. (See Section 15063(b)(1)(C) of the CEQA Guidelines). In this case, a brief discussion should identify the following:

   (a) Earlier Analyses Used. Identify and state where the earlier analysis is available for review.

   (b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

   (c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

(6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

(7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

(8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

(9) The explanation of each issue should identify:

(a) The significance criteria or threshold, if any, used to evaluate each question; and

(b) The mitigation measure identified, if any, to reduce the impact to less than significant.

4.1 Aesthetics

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?				**X**
b) Substantially damage scenic resources, including, but not limited to, trees, outcroppings, and historic buildings within a state scenic highway?				**X**
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	**X**			
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			**X**	

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.

a) Would the project have a substantial adverse effect on a scenic vista?

No Impact

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.

The project site is located in the Rose Hill Courts neighborhood, 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 include scenic vistas of numerous hillsides, natural open space 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.

Under the project, existing buildings and landscaping on site would be demolished and replaced with new multi-family residential buildings, a property management and maintenance office and landscaping. There are no views available through the project site due to the existing buildings, landscaping and trees on site. Development of the project would not have the potential to block views because no scenic views are afforded on or through the project site. Distant views of hills to the southeast from McKenzie Avenue and Florizel Street would remain. Therefore, the project would have no impact in this regard. This issue will not be analyzed further in the EIR/EIS that will be prepared for the project.

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

No Impact

The California Department of Transportation (Caltrans) provides information regarding officially designated or eligible state scenic highways, designated as part of the California Scenic Highway Program. According to Caltrans, 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 (Caltrans, 2015). As shown in **Figure 4.1-1**, the Arroyo Seco Parkway is an officially designated National Scenic Byway, California State Scenic Highway and Historic Parkway. Therefore, the project site is not located along a state scenic highway and as such, the project would have no impact in this regard.

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.

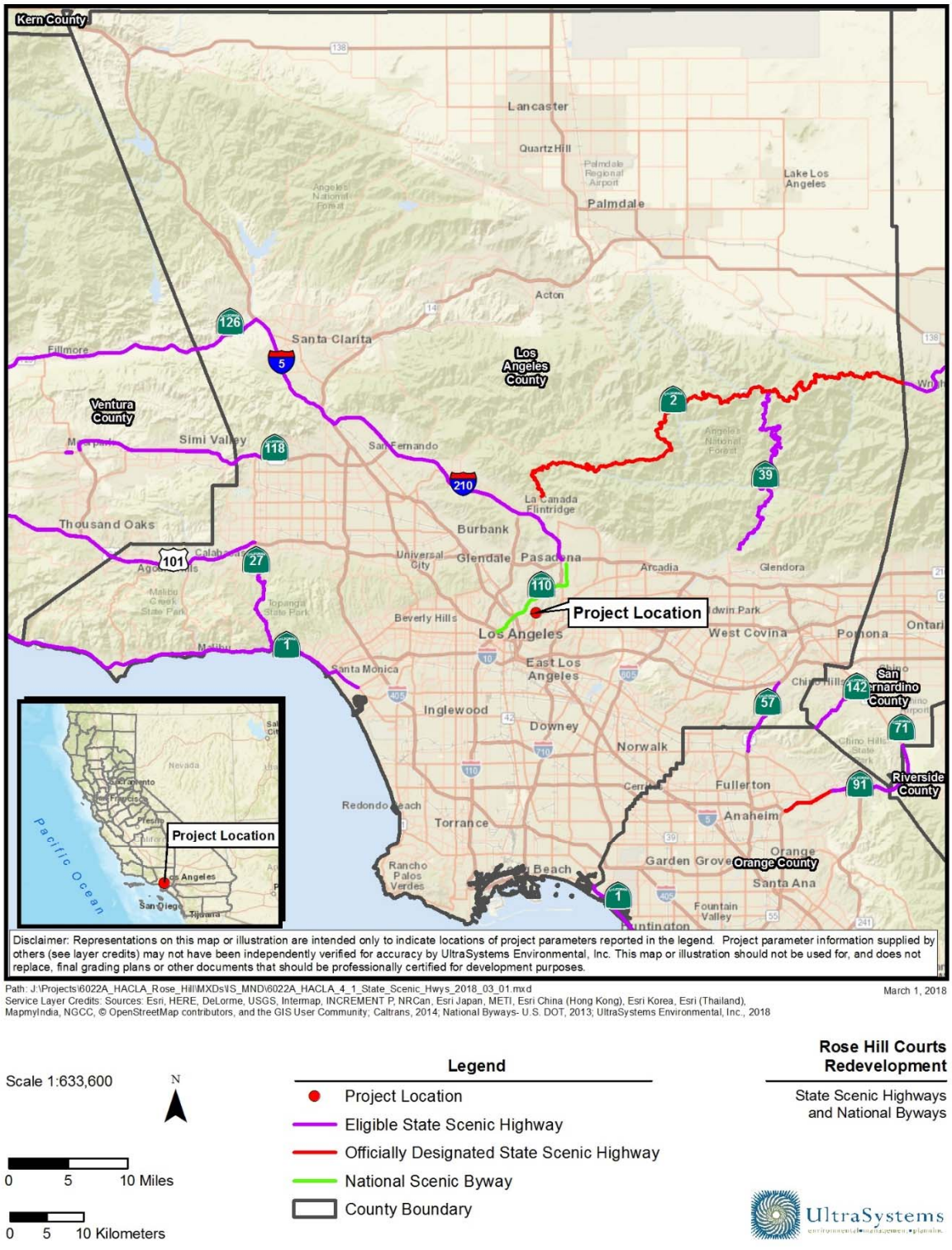
The City of Los Angeles Transportation Element designates a series of scenic byways and corridors and establishes criteria and design standards to protect and/or enhance scenic corridors. The City also requires preparation of corridor plans for each designated Scenic Highway in accordance with each Scenic Highway corridor's individual scenic character or concept and incorporation of such corridor plans into specific plan or district plan ordinances. 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. This issue will not be analyzed further in the EIR/EIS that will be prepared for the project.

c) Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Potentially Significant Impact

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

Figure 4.1-1
STATE SCENIC HIGHWAYS AND NATIONAL BYWAYS



story) buildings, aging infrastructure and scenic views and vistas of nearby and distant hillsides and natural open spaces in the surrounding area.

Below is a comparison of the existing and proposed building heights.

The height of the existing buildings on site:	The height of the proposed buildings on site:
- Community Building: 1-story, approximately 13 feet	- Community Building: 1-2 stories, 20 feet
- Townhouses/Stacked Flats: 1-story, approximately 12 feet	- Midrise Buildings: 4 stories, 50 feet
- Townhouses/Stacked Flats: 2-stories, approximately 17 feet	- Townhouses/Stacked Flats: 2-3 stories, 30 feet

Development of the project would demolish historic buildings on site, which would change the visual character of the project site. This potentially significant impact will be further analyzed in the EIR/EIS to be prepared for the project.

Shadow-sensitive uses include all residential uses and routinely usable outdoor spaces associated with recreational or institutional uses, commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas, nurseries, and existing solar collectors. These uses are considered sensitive because sunlight is important to function, physical comfort, or commerce. Shade sensitive uses in the project vicinity are limited to the residential uses surrounding the project site on all sides. The City of LA CEQA Guide provides evaluation of screening criteria for potential shade and shadow impacts from projects to nearby shadow-sensitive uses, such as residential land uses. The evaluation states that it should be determined whether the project would include light-blocking structures in excess of 60 feet in height or the equivalent (City of Los Angeles, 2006, p. A.3-2). The project does not include any structures that would exceed 60 feet in height. Thus, the addition of new buildings on the project site would not create shadows which could have a potentially significant impact to adjacent or nearby shadow-sensitive land uses. Shade and shadow will not be analyzed further in the EIR/EIS that will be prepared for the project.

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

Less Than Significant Impact

The project site is located in Northeast Los Angeles, which is characterized by low to medium nighttime ambient light levels. Artificial lighting is currently utilized on site 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. Light-sensitive uses in the project vicinity are limited to surrounding residences.

The project proposes new and upgraded exterior lighting on the project site. Installation of the proposed lighting would enhance safety and visibility throughout the project site. The proposed lighting would be visible from the area surrounding the project site. The project's proposed landscaping, parking and security lighting is expected to contribute to ambient nighttime illumination in the project vicinity. However, the lighting from the project site would be required to

comply with City of Los Angeles Municipal Code lighting requirements. The project would be required to comply with the following chapters in the Los Angeles Municipal Code:

- Chapter 1, Article 2, Section 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, Section 17.08-C. Plans for street lighting shall be submitted to and approved by the Bureau of Street Lighting for subdivision maps.

- Chapter 1, Article 4.4, Section 14.4.4. 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, Section 93.0117(b). No exterior light may cause more than two-foot candles of lighting intensity or generate direct glare onto exterior glazed windows or glass doors on any property containing residential units; elevated habitable porch, deck, or balcony on any property containing residential units; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any other property containing a residential unit or units.

Additionally, 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. The project would be required to comply with the above Municipal Code lighting standards. Therefore, light and glare will not be analyzed further in the EIR/EIS that will be prepared for the project.

4.2 Agriculture and Forestry Resources

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				**X**
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				**X**
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code § 12220(g)), timberland (as defined by Public Resources Codes § 4526), or timberland zoned Timberland Production (as defined by Government Code § 51104(g))?				**X**
d) Result in the loss of forest land or conversion of forest land to non-forest use?				**X**
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				**X**

a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact

The California Department of Conservation (DOC) established the Farmland Mapping and Monitoring Program (FMMP [see below]) in 1982 to identify critical agricultural lands and track the conversion of these lands to other uses. The FMMP is a non-regulatory program and provides a consistent and impartial analysis of agricultural land use and land use changes throughout California. The project site and surrounding land uses are designated by the FMMP (Department of Conservation, 2016) as "Area Not Mapped (Z)," which falls outside of the Natural Resources Conservation Service (NRCS) soil survey and not mapped by the FMMP. The project is located within an urbanized area, and all construction activities and onsite improvements would occur within an existing developed site.

Therefore, no farmland would be converted to non-agricultural use and no impacts would occur. This issue will not be analyzed further in the EIR/EIS that will be prepared for the project.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact

According to the 2015/2016 State of California Williamson Act Contract Land Map, the project site is identified as "Non-Enrolled Land" and does not contain land enrolled in a Williamson Act contract. The project site contains a General Plan designation of LR and is currently zoned as "[Q]R1-1D". There are no current agricultural operations existing in the vicinity of the site. Therefore, the project site is not considered to be farmland of significance or land in agricultural use and no impacts would occur (DOC, 2016). This issue will not be analyzed further in the EIR/EIS that will be prepared for the project.

c) Would the project (c) conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code § 12220(g)), timberland (as defined by Public Resources Codes § 4526), or timberland zoned Timberland Production (as defined by Government Code § 51104(g))?

No Impact

The project site is located in a highly-urbanized setting. The site's existing zoning of "R1-1D" does not support the definitions provided by Public Resources Code (PRC) § 42526 for timberland, PRC § 12220(g) for forestland, or California Government Code § 51104(g) for timberland zoned for production. PRC § 12220(g) defines forest land as "land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits." 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. This issue will not be analyzed further in the EIR/EIS that will be prepared for the project.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact

The project site contains an existing multi-family apartment complex and is located on land zoned as R1-1D. All construction activities and onsite improvements would occur within the project site. Therefore, project implementation would not result in the loss of forest land or conversion of forest land to non-forest use, and no impact would occur. This issue will not be analyzed further in the EIR/EIS that will be prepared for the project.

e) Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact

The project site contains an existing multi-family apartment complex located within a highly urbanized setting. The site is surrounded by public facilities and residential uses. No existing farmland or forest land is located in the vicinity of the project. Therefore, implementation of the project would not result in changes to the environment, due to its location or nature, which could result in the conversion of farmland to non-agricultural use or conversion of forest land to non-forest use, and no impacts would occur. This issue will not be analyzed further in the EIR/EIS that will be prepared for the project.

4.3 Air Quality

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	**X**			
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	**X**			
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	**X**			
d) Expose sensitive receptors to substantial pollutant concentrations?	**X**			
e) Create objectionable odors affecting a substantial number of people?			**X**	

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Potentially Significant Impact

The project would demolish the existing onsite housing and construct a new housing project that would house more people than the existing project site and would also generate additional vehicle trips compared to existing conditions. The project's potential impacts regarding applicable air quality plans will be analyzed in the EIR/EIS to be prepared for the project.

b) Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Potentially Significant Impact

The project would demolish the existing onsite housing and construct a new housing project that would house more people than the existing project site and would also generate additional vehicle trips compared to existing conditions. The project's potential impacts regarding air quality standards will be analyzed in the EIR/EIS to be prepared for the project.

c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Potentially Significant Impact

The project would demolish the existing onsite housing and construct a new housing project that would house more people than the existing project site and would also generate additional vehicle trips compared to existing conditions. The project's potential impacts regarding criteria pollutants will be analyzed in the EIR/EIS to be prepared for the project.

d) Would the project expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact

A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. Land uses that are considered more sensitive to changes in air quality than others are referred to as sensitive receptors. Land uses such as primary and secondary schools, hospitals, and convalescent homes are considered to be sensitive to poor air quality because the very young, the old, and the infirm are more susceptible to respiratory infections and other air quality-related health problems than the general public. Residential uses are considered sensitive because people in residential areas are often at home for extended periods of time, so they could be exposed to pollutants for extended periods. Recreational areas are considered moderately sensitive to poor air quality because vigorous exercise associated with recreation places a high demand on the human respiratory function.

The nearest sensitive receptors to the project site would be residents that would be living at the project site during Phase II construction, persons visiting Rose Hill Park located approximately 30 feet north of the project site, residential uses located approximately 50 feet south of the project site, Rose Hill Recreation Center located approximately 50 feet southeast of the project site, and Our Lady of Guadalupe School, located approximately 151 feet east of the site. 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. The project would demolish the existing onsite housing and construct a new housing project that would house more people than the existing project site and would also generate additional vehicle trips compared to existing conditions. The project's potential impacts to sensitive receptors will be analyzed in the EIR/EIS to be prepared for the project.

e) Would the project create objectionable odors affecting a substantial number of people?

Less than Significant Impact

A project-related significant adverse effect could occur if construction or operation of the project would result in generation of odors that would be perceptible in adjacent sensitive areas. According to the South Coast Air Quality Management District (SCAQMD) *CEQA Air Quality Handbook*, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies and fiberglass molding. The project involves the construction and operation of residential dwelling units, which are not typically associated with odor complaints. Potential sources that may emit odors during construction activities include equipment exhaust. Odors from these

sources would be localized and generally confined to the immediate area surrounding the project. The project would use typical construction techniques, and the odors would be typical of most construction sites and temporary in nature. As the project involves no operational elements related to industrial projects, no long-term operational objectionable odors are anticipated. Therefore, potential impacts associated with objectionable odors would be less than significant. This issue will not be analyzed further in the EIR/EIS that will be prepared for the project.

4.4 Biological Resources

Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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 Game or U.S. Fish and Wildlife Service?	**X**			
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 Game or US Fish and Wildlife Service?				**X**
c) Have a substantial adverse effect on federally protected wetlands as defined by § 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				**X**
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 nursery sites?				**X**
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				**X**
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?				**X**

a) Could the project have a substantial adverse impact, 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 Game or U.S. Fish and Wildlife Service?

Potentially Significant Impact

The project site is located in a highly-urbanized settings 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, multiple paved surface areas with impervious surfaces, and lacks suitable soils, biological resources, and physical features to support any candidate, sensitive, or special-status plant and animal species. Additionally, no special-status plants or wildlife were observed within the project site during any site surveys. Therefore, no direct or indirect impacts on special-status plant or animal species are anticipated as a result of the project activities.

However, the project site contains ornamental vegetation and building structures that could potentially provide cover and nesting habitat for bird species that have adapted to urban areas, such as rock pigeons (*Columba livia*) and mourning doves (*Zenaida macroura*). Native bird species such as the mourning doves are protected by the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code, which render it unlawful to take native breeding birds, their nests, eggs, and young. Indirect impacts on breeding 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. Therefore, the project has the potential to impact migratory non-game breeding birds, and their nests, young and eggs. This issue will be analyzed in the EIR/EIS to be prepared for the project.

b) Could the project have a substantial adverse impact 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 Game or U.S. Fish and Wildlife Service?

No Impact

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. The project site consists of paved parking lots, sidewalks, walkways, and structures. 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. This issue will not be analyzed further in the EIR/EIS that will be prepared for the project.

c) Have a substantial adverse effect on federally protected wetlands as defined by § 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact

According to the literature review and reconnaissance-level field survey of the project site conducted in May 2018, 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. This issue will not be analyzed further in the EIR/EIS that will be prepared for the project.

d) Could the project interfere substantially with the movement of any resident or migratory fish or wildlife species or with established resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?

No Impact

The project site and surrounding areas do not support resident or migratory fish species or wildlife nursery sites. According to the findings of the literature review and reconnaissance-level survey, 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. This issue will not be analyzed further in the EIR/EIS that will be prepared for the project.

e) Could the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact

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. A preliminary tree survey was conducted in December 2016, 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, there is no impact. This issue will not be analyzed further in the EIR/EIS that will be prepared for the project.

f) Could the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact

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. This issue will not be analyzed further in the EIR/EIS that will be prepared for the project.

4.5 Cultural Resources

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?	**X**			
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?			**X**	
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			**X**	
d) Disturb any human remains, including those interred outside of formal cemeteries?			**X**	

a) Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Potentially Significant Impact

A historical resource is defined in § 15064.5(a)(3) of the CEQA *Guidelines* as any object, building, structure, site, area, place, record, or manuscript determined to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. Historical resources are further defined as being associated with significant events, important persons, or distinctive characteristics of a type, period or method of construction; representing the work of an important creative individual; or possessing high artistic values. Resources listed in or determined eligible for the California Register, included in a local register, or identified as significant in a historic resource survey are also considered as historical resources under CEQA.

Similarly, the National Register criteria (contained in 36 CFR 60.4) are used to evaluate resources when complying with § 106 of the NHPA. Specifically, the National Register criteria state that eligible resources comprise districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and that (a) are associated with events that have made a significant contribution to the broad patterns of our history; or (b) that are associated with the lives of persons significant in our past; or (c) that embody the distinctive characteristics of a type, period, or method of construction, or that possess high artistic values, or that represent a significant distinguishable entity whose components may lack individual distinction; or (d) that have yielded or may be likely to yield, information important to history or prehistory.

A substantial adverse change in the significance of an historical resource, as a result of a project or development, is considered a significant impact on the environment. Substantial adverse change is defined as physical demolition, relocation, or alteration of a resource or its immediate surroundings

such that the significance of the historical resource would be materially impaired. Direct impacts are those that cause substantial adverse physical change to a historic property. Indirect impacts are those that cause substantial adverse change to the immediate surroundings of a historic property, such that the significance of a historical resource would be materially impaired.

In 2003, Rose Hill Courts was determined eligible for listing in the National Register of Historic Places through the federal review process pursuant to Section 106 of the 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 National Register, it is automatically included in the California Register of Historical Resources.

Because the project would demolish Rose Hill Courts, there would be a potentially significant impact to historical resources. This issue will be analyzed in the EIR/EIS to be prepared for the project.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Less Than Significant Impact

An archaeological resource is defined in § 15064.5(c) of the CEQA Guidelines as a site, area or place determined to be historically significant as defined in § 15064(a) of the CEQA Guidelines, or as a unique archaeological resource defined in § 21083.2 of the PRC as an artifact, object, or site that contains information needed to answer important scientific research questions of public interest or that has a special and particular quality such as being the oldest or best example of its type, or that is directly associated with a scientifically recognized important prehistoric or historic event or person. The project would be required to comply with Pubic Resources Code (PRC) 21083.2 and 5097.5, which are laws requiring that state cultural resources be protected. In the unlikely event that an archeological resource is discovered during precise grading activities, the California PRC requirements would become effective immediately. Therefore, the project would have a less than significant to archeological resources.

c) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact

The fully built nature of the project site and elevation relative to adjacent roads suggests that ground here has been thoroughly cut and filled, with no original surface soil remaining. The project's proposed grading activities are not anticipated to directly or indirectly destroy any resources because the project site has been previously disturbed and developed. In the unlikely event that a unique paleontological resource or unique geologic feature is discovered during precise grading activities, then the California PRC requirements would become effective immediately. The project would be required to comply with Pubic Resources Code (PRC) 21083.2 and 5097.5, which are laws requiring that state cultural resources be protected. Therefore, the project would have a less than significant impact to paleontological resources.

d) Would the project disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant Impact

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.

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.

4.6 Geology and Soils

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
(a) 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.			**X**	
ii) Strong seismic ground shaking?			**X**	
iii) Seismic-related ground failure, including liquefaction?			**X**	
iv) Landslides?			**X**	
(b) Result in substantial soil erosion or the loss of topsoil?	**X**			
(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 off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	**X**			
(d) Be located on expansive soil, as defined in Table 18-1 B of the Uniform Building Code (1994), creating substantial risks to life or property?	**X**			
(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?				**X**

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.

Less Than Significant Impact

The project site is located in a highly seismic region of California within the influence of several fault systems. According to the California Department of Conservation (DOC, 2007), the project site is located more than 1.5 miles from known regionally active quaternary faults (**Figure 4.6-1**) and is not located within the boundaries of a designated Alquist-Priolo Earthquake Fault Zone (**Figure 4.6-2**). As detailed in the Geotechnical Investigation prepared for the project, the closest active fault to the site is the Raymond Fault located approximately 2.3 miles to the north. Other nearby active faults are the Eagle Rock Fault, the Verdugo Fault, the Hollywood Fault, the Whittier Fault, and the Sierra Madre Fault located approximately 4.0 miles northwest, 4.8 miles northwest, 4.9 miles west, 6.0 miles southeast, and 7.6 miles northeast of the site, respectively. The active San Andreas Fault Zone is located approximately 30 miles northeast of the project site. Several buried thrust faults, commonly referred to as blind thrusts, underlie the Los Angeles area. The Puente Hills Blind Thrust and the Northridge Thrust faults and others in the Los Angeles area do not present a potential surface fault rupture hazard at the site (Geocon, 2018, p. 5).

Additionally, the Geotechnical Investigation states that 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. Therefore, the potential for surface rupture due to faulting occurring beneath the site during the design life of the proposed development is considered low (Geocon, 2018, p. 4). Therefore, the project would have a less than significant impact regarding rupture of a known earthquake fault. This issue will not be analyzed further in the EIR/EIS that will be prepared for the project.

ii) Strong seismic ground shaking?

Less Than Significant Impact

The project is located within a seismically active region, susceptible to collapse of structures, buckling of walls, and damage to foundations from strong seismic ground shaking. The project would be constructed in accordance with applicable California Building Code (CBC) (Title 24, Part 2, California Code of Regulations) 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 (DSA).

The CBC provides minimum standards to protect property and the public welfare by regulating the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of seismic shaking and adverse soil conditions. The CBC contains provisions for earthquake safety based on factors including occupancy type, the types of soil and rock onsite, and the strength of ground motion with specified probability of occurring at the site. It requires the preparation of project-specific geotechnical reports prepared by a Certified Engineering Geologist or Geotechnical Engineer prior to construction of proposed structures.

A Geotechnical Investigation was prepared for the project. The Geotechnical Investigation states that as with all of Southern California, the project site has experienced historic earthquakes from various regional faults. The seismicity of the region surrounding the project site was formulated based on

Figure 4.6-1
REGIONALLY ACTIVE FAULTS

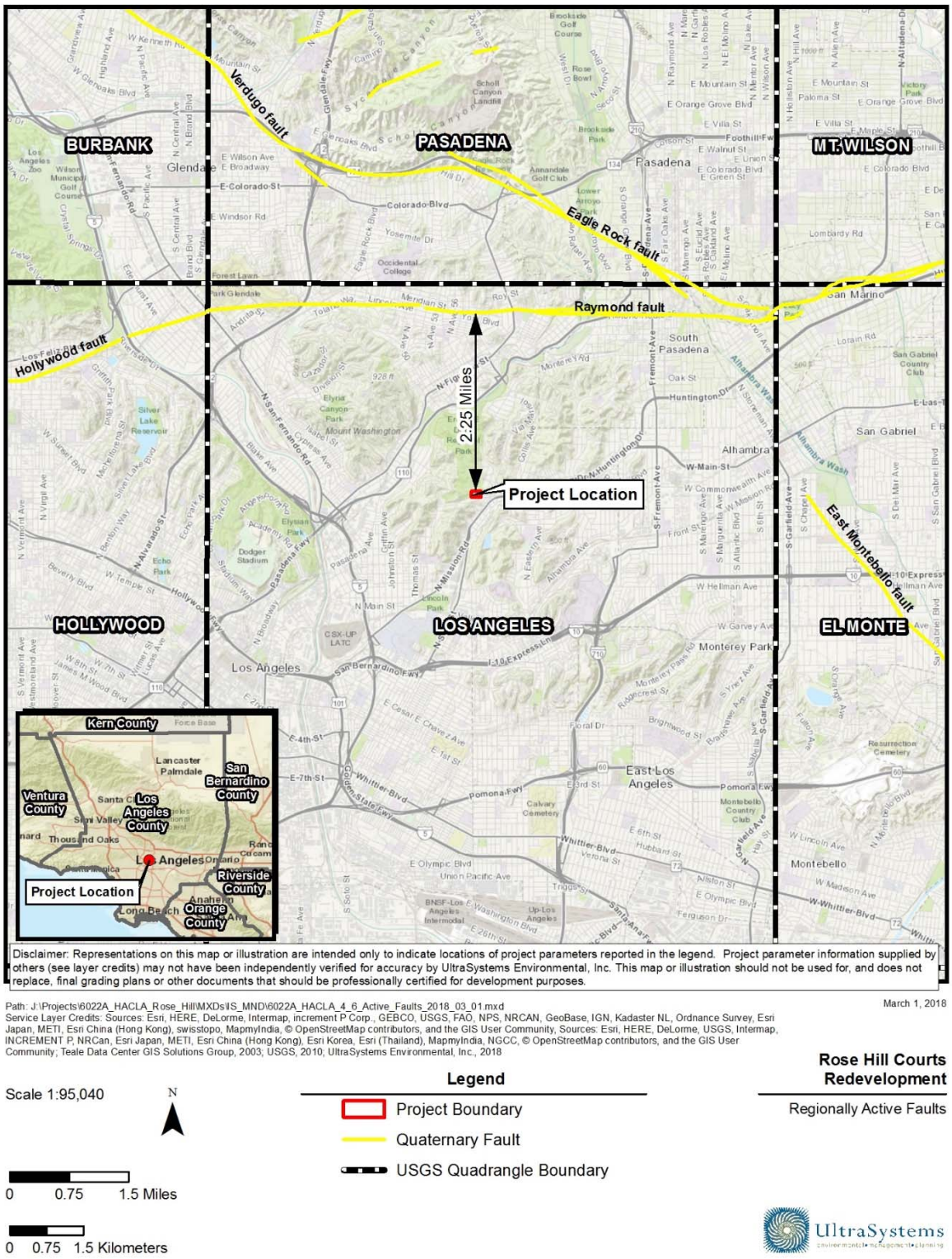
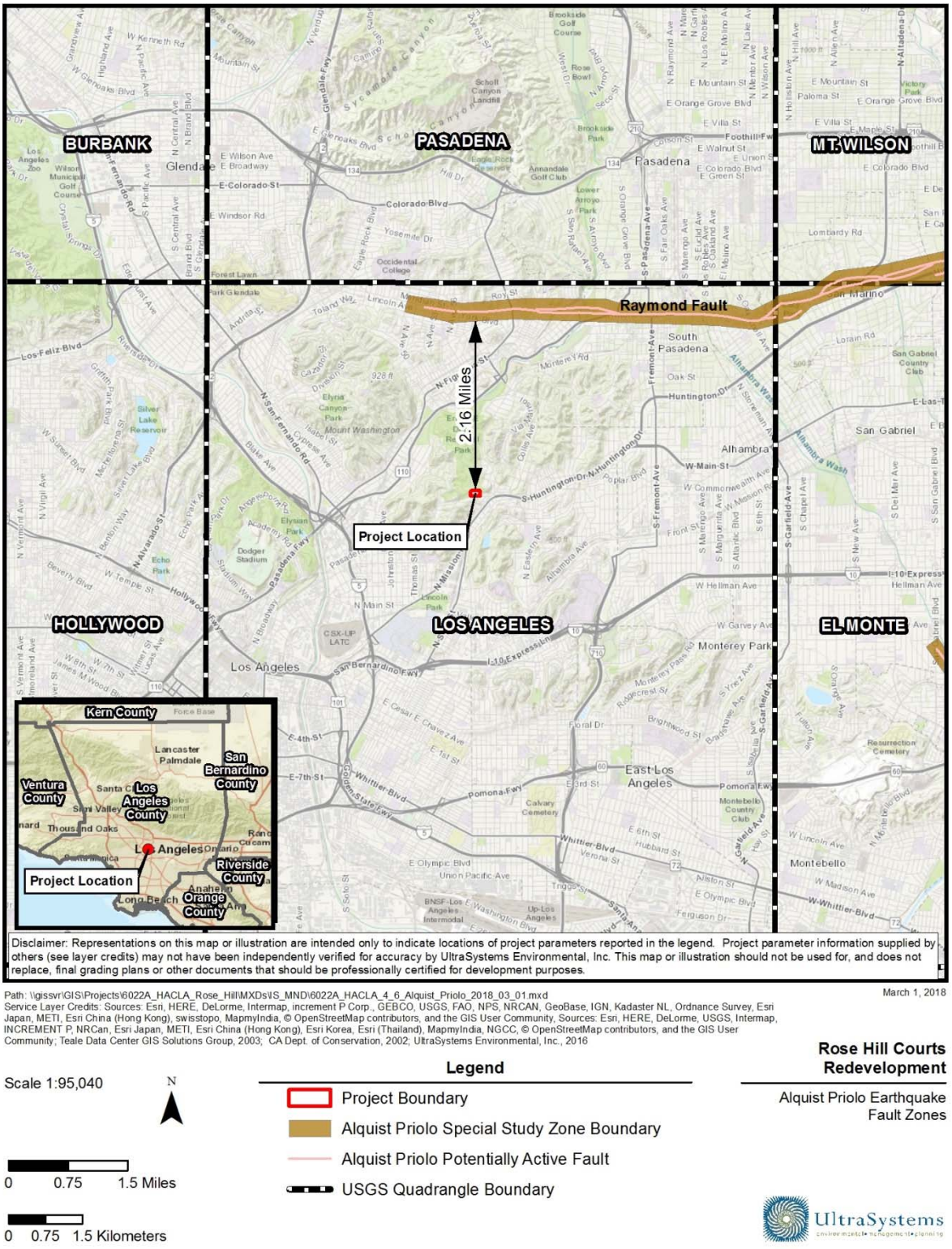


Figure 4.6-2
ALQUIST-PRIOLO FAULT ZONES



research of an electronic database of earthquake data. The site could be subjected to strong ground shaking in the event of an earthquake. However, 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 (Geocon, 2018, p. 5). The project would be required to comply with all City of Los Angeles building codes and engineering practices. Thus, the project would have a less than significant impact regarding strong seismic ground shaking. This issue will not be analyzed further in the EIR/EIS that will be prepared for the project.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact

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, 2018, p. 7).

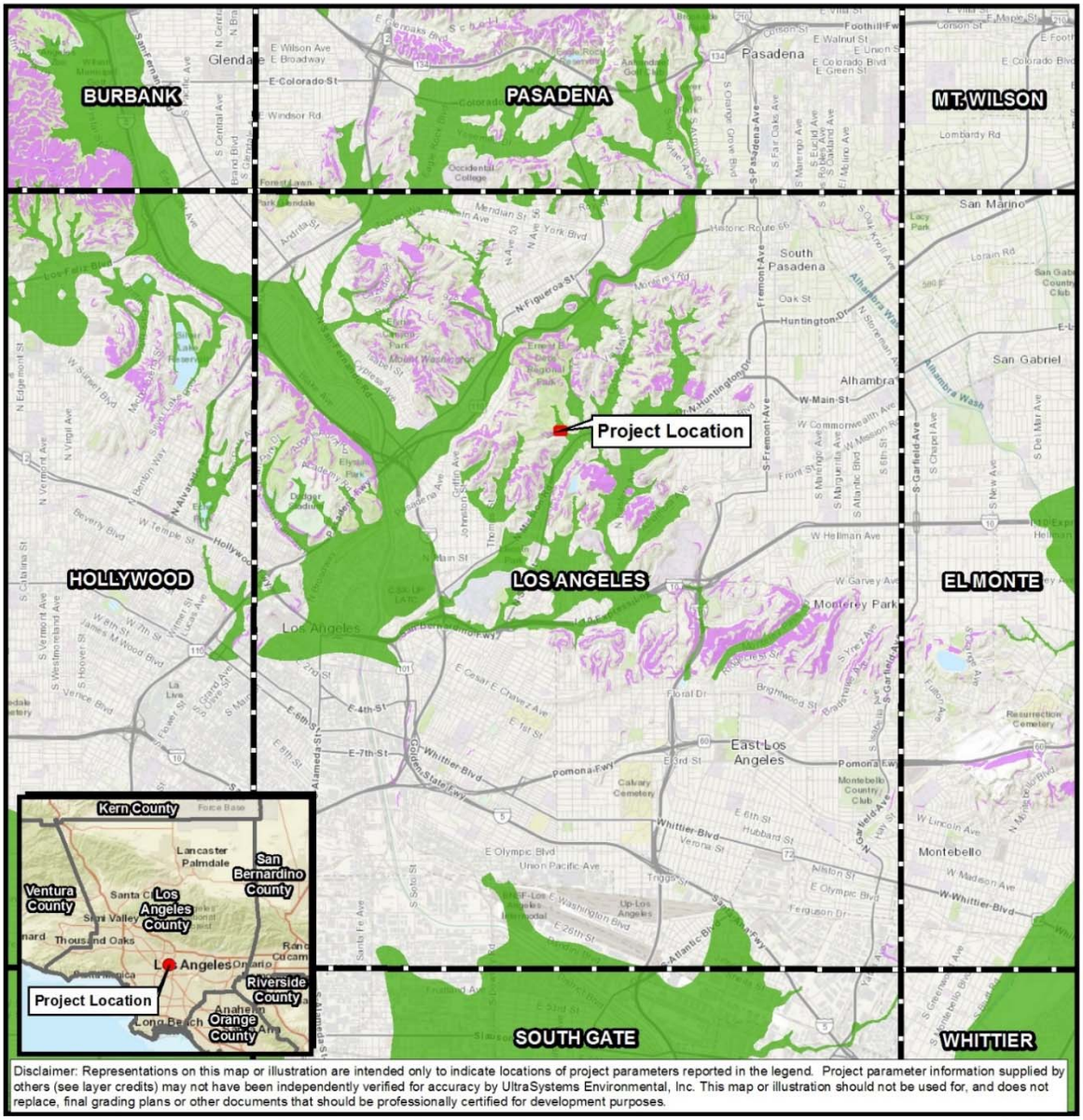
The State of California Seismic Hazard Zone Map for the Los Angeles Quadrangle indicates that the majority of the site is located within a zone of required investigation for liquefaction. The liquefaction analysis was performed for a Design Earthquake level by using a historic high groundwater table of 20 feet below the ground surface, a magnitude 6.62 earthquake, and a peak horizontal acceleration of 0.702g (⅔PGAM). The liquefaction analyses (refer to **Appendix C** of this document), for borings B1 and B2, indicate that the alluvial soils below the historic high groundwater level are not susceptible to liquefaction settlement during Design Earthquake ground motion. Additionally, the liquefaction analysis was also performed for the Maximum Considered Earthquake level by using 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 (PGAM). The liquefaction analysis (refer to **Appendix C** of this document) for borings B1 and B2, indicate that the alluvial soils below the historic high groundwater level are not susceptible to liquefaction settlement during Maximum Considered Earthquake ground motion (Geocon, 2018, p. 8). Therefore, seismic related ground failure and liquefaction impacts would be less than significant. This issue will not be analyzed further in the EIR/EIS that will be prepared for the project.

iv) Landslides?

Less Than Significant Impact

Landslides occur when the stability of the slope changes from a stable to an unstable condition. A change in the stability of a slope can be caused by a number of factors, acting together or alone. Natural causes of landslides include groundwater (pore water) pressure acting to destabilize the slope, loss of vegetative structure, erosion of the toe of a slope by rivers or ocean waves, weakening of a slope through saturation by snow melt or heavy rains, earthquakes adding loads to barely stable slope, earthquake-caused liquefaction destabilizing slopes, and volcanic eruptions. 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 (Refer to **Figure 4.6-3**). There are no known

Figure 4.6-3
LANDSLIDES AND LIQUEFACTION



Path: J:\Projects\6022A_HACLA_Rose_Hill\MXDs\IS_MND\6022A_HACLA_4_6_Landslide_Liquefaction_2018_03_01.mxd
March 1, 2018

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, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), MapmyIndia, NGCC, © 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., 2018

Scale 1:95,040

N

0 0.75 1.5 Miles

0 0.75 1.5 Kilometers

Legend

- Project Boundary
- Earthquake-induced Landslides
- Liquefaction
- USGS Quadrangle Boundary

Rose Hill Courts Redevelopment

Landslides and Liquefaction

UltraSystems

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 (Geocon, 2018, p. 9). This issue will not be analyzed further in the EIR/EIS that will be prepared for the project.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Potentially Significant Impact

The project site has a low potential for soil erosion because it is relatively flat and is considered urban land where almost 90 percent of the surface has been covered by asphalt, concrete, buildings, and other structures. The project would alter the existing ground cover, and drainage patterns would be modified with development of the project. The project's potential to result in soil erosion or the loss of topsoil will be analyzed further in the EIR/EIS that will be prepared for the project.

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 off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Potentially Significant Impact

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.

The seismically-induced settlement calculations were performed in accordance with the American Society of Civil Engineers, Technical Engineering and Design Guides as adapted from the US Army Corps of Engineers. 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 peak ground acceleration (⅔PGAM) (Geocon, 2018, p. 9). Therefore, because the soil could be subject to settlement during an earthquake, this will be analyzed further in the EIR/EIS that will be prepared for the project.

d) Would the project be located on expansive soil, as defined in Table 18-1 B of the Uniform Building Code (1994), creating substantial risks to life or property?

Potentially Significant Impact

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 Section 1803.5.3 (Geocon, 2018, p. 13). Therefore, this will be analyzed further in the EIR/EIS that will be prepared for the project.

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?

No Impact

The project would not include septic tanks or alternative waste water disposal systems. For this reason, no impacts associated with septic tanks or alternative waste water disposal systems would occur. This will not be analyzed further in the EIR/EIS that will be prepared for the project.

4.7 Greenhouse Gas Emissions

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	X			
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	X			

a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Potentially Significant Impact

The project would demolish the existing onsite housing and construct a new project that would house more people than the existing project site and would also generate additional vehicle trips compared to existing conditions. This will be analyzed in the EIR/EIS to be prepared for the project.

b) Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Potentially Significant Impact

The project would demolish the existing onsite housing and construct a new housing project that would house more people than the existing project site and would also generate additional vehicle trips compared to existing conditions. This will be analyzed in the EIR/EIS to be prepared for the project.

4.8 Hazards and Hazardous Materials

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	**X**			
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?	**X**			
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one quarter mile of an existing or proposed school?	**X**			
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?			**X**	
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 for people residing or working in the project area?				**X**
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				**X**
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				**X**

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?			X	

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Potentially Significant Impact

The project includes the demolition of 14 existing buildings comprised of 100 residential apartments, and one administration building. As detailed in the Phase I Report conducted in April 2018 for the project site by Altec, several technical studies were conducted for the project site, as detailed below (Altec, 2018, pp. 37-39):

- **Lead Hazard Reduction Workplan – Rose Hill Courts, Buildings Units 1-6, Units 95-100, and Administration Building, 4466 Florizel St., Los Angeles, CA 90032 (July 29, 2008). LFR Inc.**

  This workplan covers proposed work performed in Units 1-6 and 95-100 and the Administration building. The work included removal of loose and flaking lead-based paint chips from eaves, fascia boards and drip boards from three building exteriors, removal of visible paint chip debris within 16 feet of the building walls, and the removal lead contaminated soil from the perimeters of the three buildings. The workplan indicates that post abatement soil and wipe samples would be collected by HACLA's representative in accordance with HUD guidelines after the contractor indicates they have completed the work. The adopted clearance criteria were: 1,000 ppm (mg/kg) for bare soil areas and 800 µg/ft$_2$ for the concrete/blacktop exterior surfaces. The workplan also indicated that waste characterization samples would be collected before the waste materials were transported for disposal.

- **Lead Hazard Stabilization Monitoring Closeout Report, Rose Hill Courts Development, 4466 Florizel St., Los Angeles, California (February 9, 2009). LFR Inc.**

  A DHS Certified Lead Project Monitor and a DHS Certified Inspector/Risk Assessor from LFR Inc. performed the lead hazard stabilization monitoring and clearance services for the work performed. After stabilization was completed, LFR, Inc. certified that the work areas were free of visible lead-based paint (LBP) debris following the lead paint stabilization, soil excavation and clean-up activities. The final wipe samples yielded results below 400 µg/ft$_2$ and the final soil composite sample results were less than 1,000 ppm.

- **Limited Asbestos & Lead-Based Paint Sampling and Visual Mold Assessment, Rose Hill Courts Development, 4466 Florizel St., Los Angeles, California (September 10, 2012). SCA/LA Environmental, Inc.**

  SCA/LA performed limited asbestos and lead-based paint sampling and visual mold assessment for Units 3 and 14 and the "social hall" on August 28, 2012. 57 bulk asbestos samples and 13 bulk paint chip samples were collected. Asbestos was detected in the kitchen flooring, in the flooring within the kitchen closet and on the stairs, in the window caulking and was assumed present in the vapor barrier beneath the wood flooring in Unit 3. Asbestos was detected in window caulking and was assumed present in the vapor barrier beneath the wood flooring in Unit 14. Asbestos was detected in window caulking of the social hall. Lead paint was assumed present in the ceramic wall tiles in the bathrooms of Units 1 and 3. Lead was identified in the brown paint on the exterior window frames of the social hall. The three areas were assessed for water damage and mold growth; all tested areas were below 10 percent on the moisture meter used during the assessment. No visible mold was observed.

- **Abatement Work Plan – Summary of Work Hazardous Material Abatement – Rose Hill Courts, 4466 Florizel St., Los Angeles, CA 90032 (February 9, 2009). SCA/LA Environmental, Inc.**

  This document covers procedures for the removal, handling and disposal of various hazardous materials in accordance with the Housing Authority's (HACLA) Master Specification Sections 01110 and 02090 and applicable federal, state and local regulations. It appears to reference proposed work in Units 3, 14 and the social hall only.

- **Asbestos Abatement and Lead-Related Demolition Closeout Report. Rose Hill Courts Apartments, 4466 Florizel St., Los Angeles, CA 90032. SCA/LA Environmental, Inc.**

  This document references selected asbestos removal and lead paint removal in Units 3, 14 and the social hall only. A total of 16 square feet of asbestos-containing flooring was removed from Unit 3; no other asbestos removal was performed. Ceramic tiles (with assumed lead-coated glazing) were removed from Unit 3 and 14. No other asbestos or lead removal was included in the work scope accomplished during this limited project.

- **Phase I Environmental Site Assessment, Rose Hill Courts 100-Unit Multi-Family Housing Development APN 5305-011-900 - 5.24 Acres 4401 Boundary Ave. and 4466 Florizel St. (Florizel St., Boundary Ave., Mercury Ave., McKenzie Ave. and Victorine St.) Los Angeles, California 90032 (June 29, 2016), Altec.**

  A Phase I ESA was performed for the Rose Hill Courts housing development in 2016. The findings identified potential RECs in association with the target property. However, the potential RECs were limited to (1) Lead in soil around the perimeters of Buildings #2, #6, #7, #9, #11, #12, #13, and #14, (2) the potential for lead in soil in child play areas and at other bare/exposed locations from prior demolished dwellings, (3) the potential for indoor radon gas and (4) the potential for lead in drinking water.

- **Limited Asbestos Sampling Report, Rose Hill Courts 14 Residential Buildings (100 Units) and Administration Building Florizel St., Boundary Ave., Mercury Ave.,**

McKenzie Ave. and Victorine St., Los Angeles, California (Revised January 6, 2017), Altec.

Asbestos sampling was performed on June 7, 2016 and included the interiors of 8 vacant apartment units (#2-4470 Florizel Street, #3-4472 Florizel Street, #10-4480 Florizel Street, #13-3527 McKenzie Avenue, #14-3525 McKenzie Avenue, #46-4457 Mercury Avenue, #76-4416 Florizel Street, and #78-4412 Florizel Street), and the Administration Building (4466 Florizel Street). Representative samples were collected from the exteriors and roofs of each of the onsite buildings. On December 5, 2016, Altec completed a walk-through visual inspection of the 92 remaining units but no additional asbestos sampling was performed. Asbestos-containing materials were identified.

- **Limited Lead Testing Report (Revised), Rose Hill Courts 14 Residential Buildings (100 Units) and Administration Building Florizel St., Boundary Ave., Mercury Ave., McKenzie Ave. and Victorine St., Los Angeles, California (Revised January 6, 2017), Altec.**

  Lead testing was performed on June 7, 2016 and included the interiors of 8 vacant apartment units (#2-4470 Florizel Street., #3-4472 Florizel Street, #10-4480 Florizel Street, #13-3527 McKenzie Avenue, #14-3525 McKenzie Avenue, #46-4457 Mercury Avenue, #76-4416 Florizel Street, and #78-4412 Florizel Street), and the Administration Building (4466 Florizel Street). Composite soil samples were also collected along the drip line/foundations of each building and the samples were submitted for laboratory analysis in accordance with US EPA Method 6010B. On December 5, 2016, Altec completed a walk-through visual inspection of the 92 remaining units. Lead paint testing was not performed in these units; however, one additional soil sample was collected from the child playground Lead-containing paint/coatings and lead-containing soil were identified.

Altec was hired to perform an update to the Phase I ESA for the project site. Altec prepared the Phase I ESA Update, dated April 20, 2018. This Phase I ESA found the following Recognized Environmental Conditions (RECs):

- Potential REC – Lead in Soil. Lead has been found in soil along existing building foundations. The most protective screening level for lead in residential soil in California is 80 milligrams per kilogram (mg/kg). Any lead above applicable action levels will be remediated by trained personnel in accordance with applicable laws (see discussion below regarding HACLA Master Specification Sections 01110 and 02090). Due to the presence of lead in the soil there could be a potential impact. A potentially significant impact could occur. This issue will be further analyzed in an Environmental Impact Report/Environmental Impact Statement (EIR/EIS) to be prepared for the project.

- Potential REC – Indoor radon gas. There is a moderate potential for indoor radon gas levels at or exceeding the US EPA action level of 4.0 pCi/L. Due to the presence of indoor radon gas, project impacts regarding hazards and hazardous materials could be potentially significant. A potentially significant impact could occur. This issue will be further analyzed in an Environmental Impact Report/Environmental Impact Statement (EIR/EIS) to be prepared for the project.

The Phase I ESA found the following regarding lead in drinking water.

- There is a potential for the presence of lead in drinking water associated with the leaching of lead from plumbing components/water supply lines (Altec, 2018, p. 5). Due to the presence of lead in drinking water, project impacts regarding hazards and hazardous materials could be potentially significant. A potentially significant impact could occur. This issue will be further analyzed in an Environmental Impact Report/Environmental Impact Statement (EIR/EIS) to be prepared for the project.

Demolition of the existing onsite structures will require the remediation, removal, mitigation, or stabilization of Asbestos Containing Materials (ACMs) and Lead Based Paint (LBP) previously identified in the project buildings (Altec, 2018). Due to the presence of ACMs and LBP on the project site, the project could have a potentially significant impact. This issue will be further analyzed in an Environmental Impact Report/Environmental Impact Statement (EIR/EIS) to be prepared for the project.

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?

Potentially Significant Impact

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; Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA); Occupational Safety and Health Administration (OSHA); California hazardous waste control law;[3] DOSH; SCAQMD; Los Angeles County Department of Public Health (LA Public Health); and City of Los Angeles Fire Department (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. However, as part of the project the existing lead in the soil will have to be removed and LBP and ACMs will also be removed. Therefore, a potentially significant impact could occur. This issue will be further analyzed in an Environmental Impact Report/Environmental Impact Statement (EIR/EIS) to be prepared for the project.

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?

Potentially Significant Impact

Our Lady of Guadalupe School (TK – 8) is located within one-quarter mile, east of the project site. The project is anticipated to store and use products such as fuel, cleaning products, etcetera during the construction phase. Upon project build out, it is anticipated that residents could store small amounts of potentially hazardous substances such as cleaning products. Onsite maintenance of may include the use and storage of pesticides and other similar substances to control pests and weeds, etcetera, which would be stored and used per all applicable laws and regulations.

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

The project would be required to comply with notice and consultation requirements applicable to schools in PRC Section (PRC) 21151.4 and State CEQA Guidelines Section 15186. PRC 21151.4 pertains to projects within one-quarter mile of a school pertains to 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 specified amounts. CEQA Guidelines Section 15186 establishes a special requirement for certain school projects, as well as certain projects near schools, to ensure that potential health impacts resulting from exposure to hazardous materials, wastes, and substances will be carefully examined and disclosed in a ND or EIR, and that the lead agency will consult with other agencies in this regard.

As part of the project the existing lead in the soil would have to be removed, and LBP and ACMs will also be removed. Therefore, a potentially significant impact could occur. This issue will be further analyzed in an Environmental Impact Report/Environmental Impact Statement (EIR/EIS) to be prepared for the project.

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?

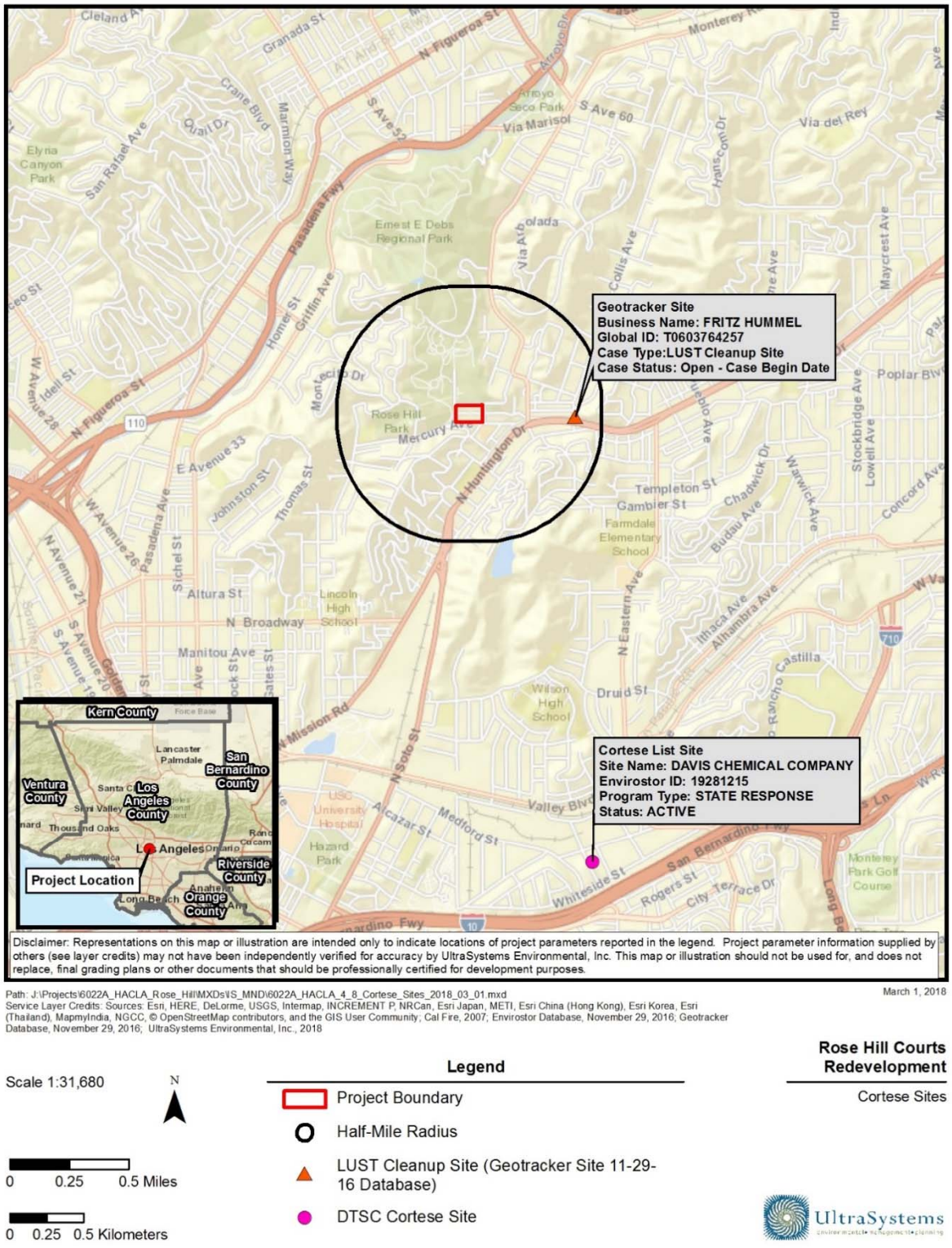
Less Than Significant Impact

Government Code § 65962.5 requires the Department of Toxic Substances Control (DTSC) to compile and update, at least annually, lists of the following:

- Hazardous waste and substances sites from the DTSC EnviroStor database.
- Leaking Underground Storage Tank (LUST) sites by county and fiscal year in the State Water Resources Control Board (SWRCB) GeoTracker database.
- Solid waste disposal sites identified by SWRCB with waste constituents above hazardous waste levels outside waste management units.
- SWRCB Cease and Desist Orders (CDOs) and Cleanup and Abatement Orders (CAOs). CDOs and CAOs may be issued for discharges of domestic sewage, food processing wastes, or sediment that do not contain hazardous materials.
- Hazardous waste facilities subject to corrective action pursuant to § 25187.5 of the Health and Safety Code, identified by DTSC. If corrective action is not taken on or before the date specified in a CDO or CAO, or if immediate corrective action is necessary to remedy or prevent an imminent substantial danger to the public health, domestic livestock, wildlife, or the environment, the DTSC may take, or contract for corrective action and recover the cost for a responsible party.

These lists are collectively referred to as the "Cortese List." The project site was not identified as a Cortese site. The nearest Cortese-listed property is an open leaking underground storage tank (LUST) site located approximately 0.5 mile east of the project site. Based on a review of site documentation on GeoTracker, this LUST site has been ordered closed by the SWRCB, and no evidence of offsite contamination migration onto the project site was identified. Refer to **Figure 4.8-1**.

Figure 4.8-1
CORTESE SITES



The project site is listed on the California Environmental Protection Agency (CalEPA) DTSC HAZNET database. The HAZNET database is extracted from the copies of hazardous waste manifests received each year by the DTSC. The HAZNET database lists approximately 0.3-ton and 10 tons of "other organic solids" removed for offsite disposal in 2003 and 1998. No other information has been identified for these database listings. Listing on the HAZNET database is not of concern for the project because the organic solids were removed and disposed of offsite. The above-described listings do not identify the project site on the *Cortese List*, therefore, the project would have a less than significant impact in this regard. This will not be analyzed further in the EIR/EIS that will be prepared for the project.

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 for people residing or working in the project area?

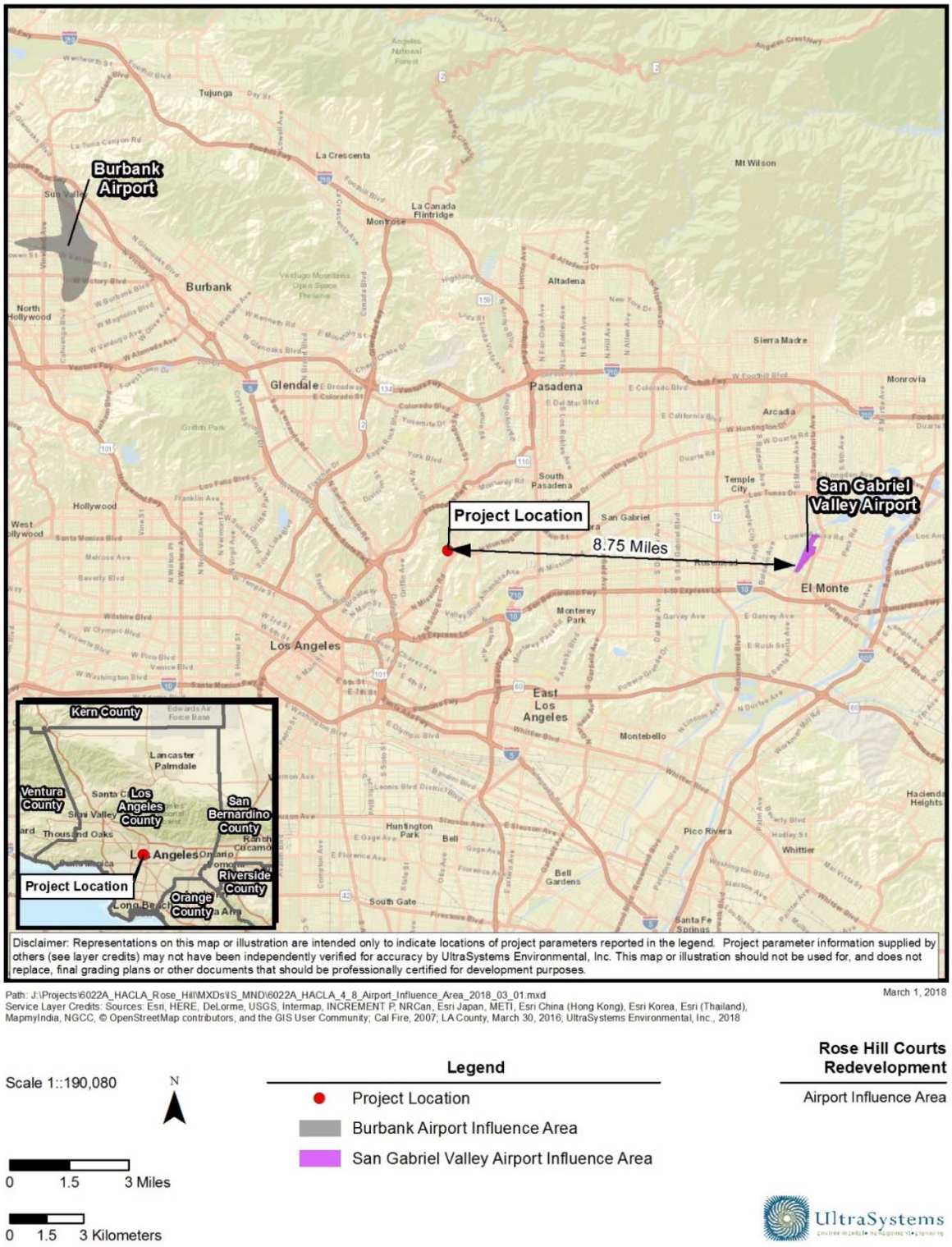
No Impact

Airport Land Use Compatibility Plan (ALUCP). An ALUCP is a planning document that contains policies for promoting safety and compatibility between public use airports and the communities that surround them. Los Angeles County Airport Land Use Commission (ALUC) has adopted the comprehensive Los Angeles County ALUCP that covers all of the airports within its jurisdiction. The document was formerly known as the Los Angeles County Airport Land Use Plan and the Los Angeles County Airport ALUC Comprehensive Land Use Plan.

Airport Influence Area (AIA). AIA is the area in which current or future airport-related noise, over flight, safety, and/or airspace protection factors may significantly affect land uses or necessitate restrictions on those uses. It includes airport owned property, Runway Protection Zones (RPZ), inner & outer safety zones and Community Noise Equivalent Level (CNEL) contours. According to Section 1.3.2 (page 25) of the State Airport Land Use Planning Handbook, "The planning boundary of the ALUCP is the "airport influence area," and is established by the ALUC after a hearing and consultation with the involved agencies (PUC § 21675 (c))."

The project is not located within the boundary of an AIA (**Figure 4.8-2**), or within two miles of a public airport or public use airport (Los Angeles County GIS Data Portal, 2018). For these reasons, the project would not expose people to safety hazards due to proximity to a public airport, and no impacts would occur. This will not be analyzed further in the EIR/EIS that will be prepared for the project.

Figure 4.8-2
AIRPORT INFLUENCE AREA



f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

No Impact

The project is not located within the vicinity of a private airstrip (Google Earth Pro, 2018). For this reason, the project would not expose people to safety hazards due to proximity with a private airstrip, and no impacts are anticipated. This will not be analyzed further in the EIR/EIS that will be prepared for the project.

g) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

No Impact

Review of Los Angeles County Evacuation Route mapping indicates that the project site is not accessed by a road designated as an evacuation route. Huntington Drive is a designated evacuation route located approximately 1,000 feet southeast of the project site (Los Angeles County Department of Public Works, 2018). Because the project site is not adjacent to nor accessed by a road designated as an evacuation route, the project would have no impact because it would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. This will not be analyzed further in the EIR/EIS that will be prepared for the project.

h) Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Less than Significant Impact

The California Department of Forestry and Fire Protection (CalFire) developed Fire Hazard Severity Zones (FHSZ) for State Responsibility Areas (SRAs) and Local Responsibility Areas (LRAs). Refer to **Figures 4.8-3** and **4.8-4**. The project site is located in an SRA area with a non-fire hazard designation (CalFire, 2007) and a LRA with a Very High fire hazard designation (CalFire, 2012).

Very High fire hazard designation refers to either:

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

Figure 4.8-3
FIRE HAZARDS - SRA

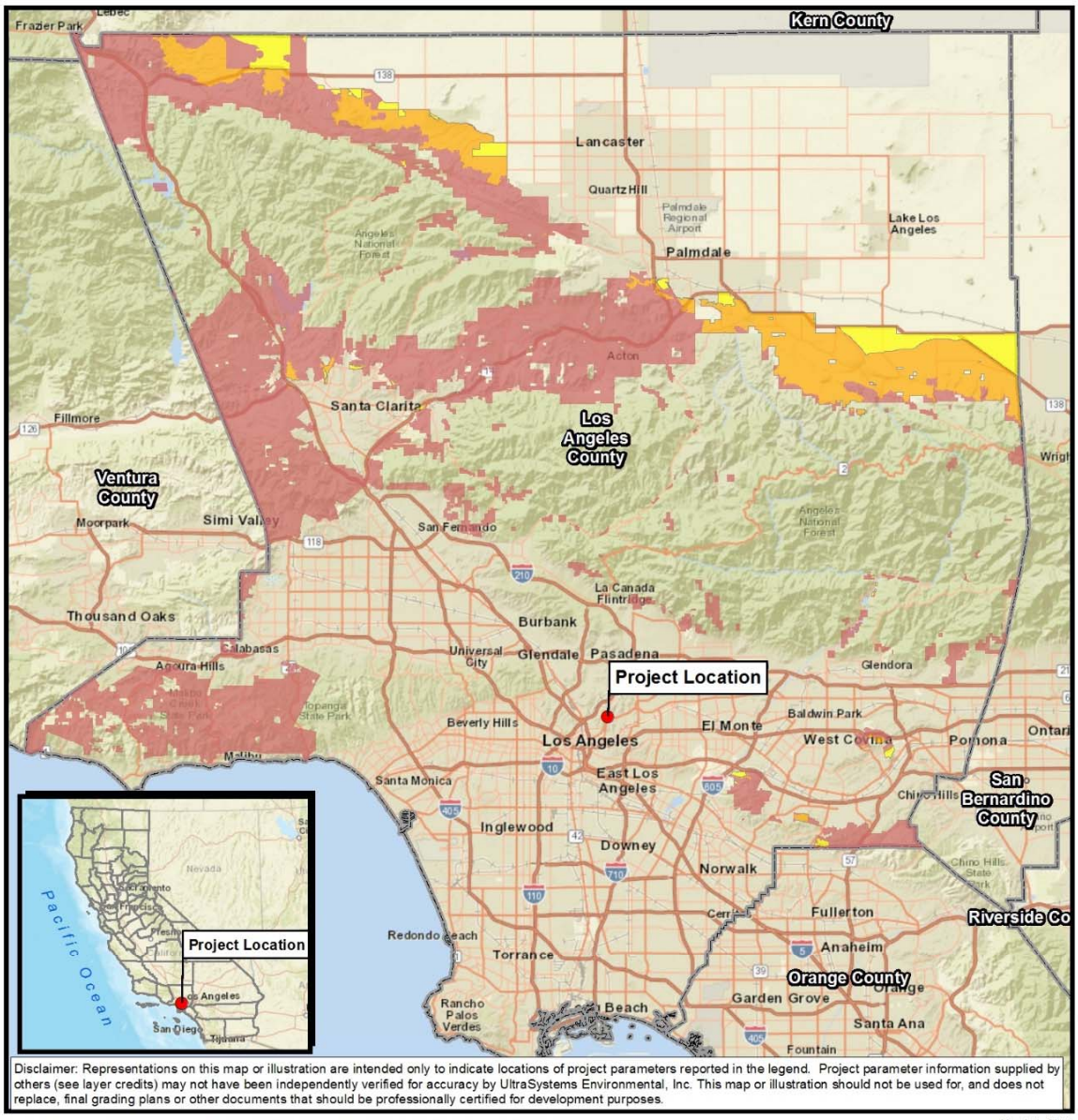
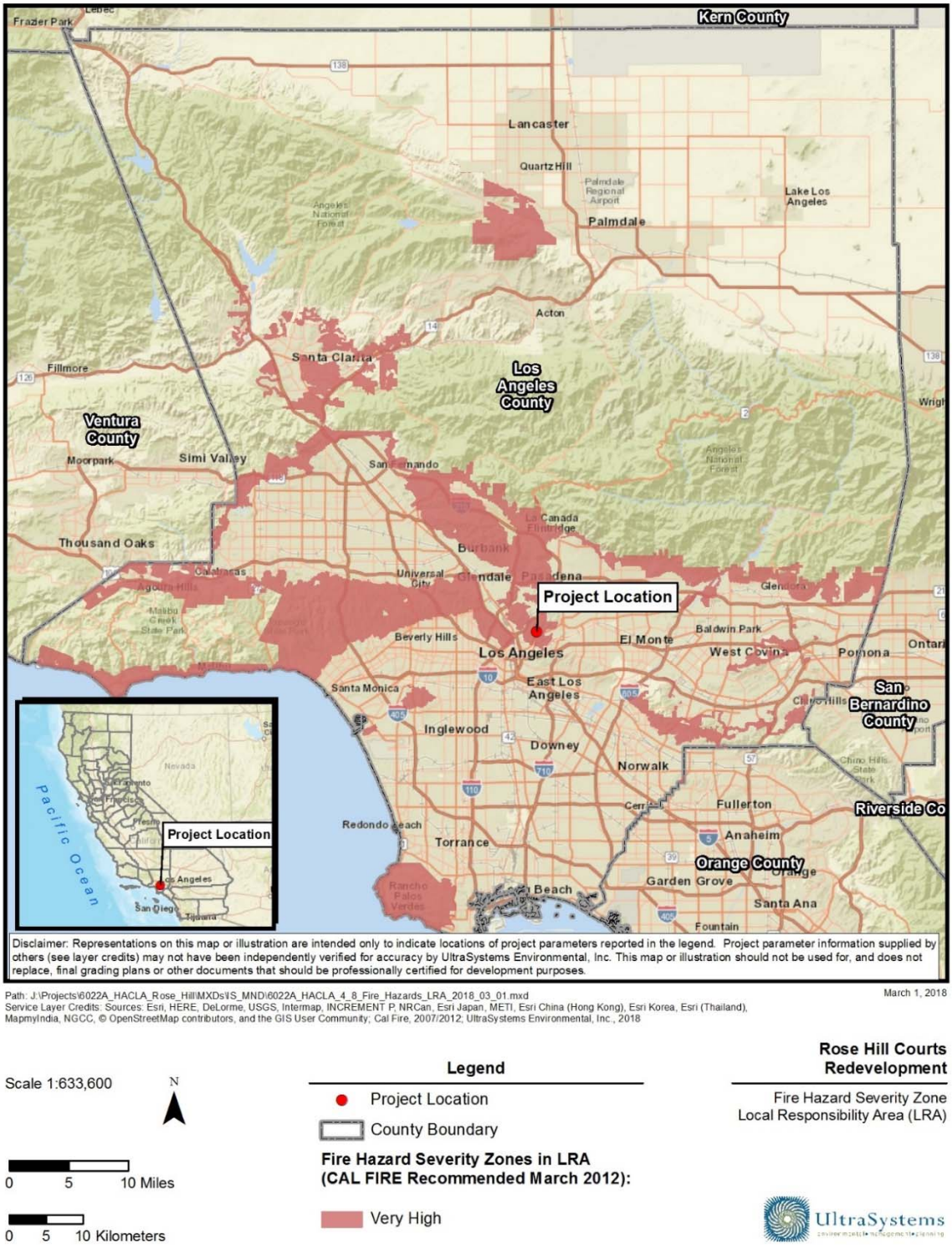


Figure 4.8-4
FIRE HAZARDS - Local Responsibility Area



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 (see above).

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, portable fire extinguishers, and emergency signage in all buildings, and required brush clearance), identified in the latest edition of the CBC.

The landscape design for Rose Hill Courts would include plant materials that are both drought tolerant and fire retardant. Plants adjacent to building would be spaced further apart, and trees would be on 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 permeant automatic irrigation system would be installed on site. The landscaping on site would be maintained on 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 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 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). 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).

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. This will not be analyzed further in the EIR/EIS that will be prepared for the project.

4.9 Hydrology and Water Quality

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements?			**X**	
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?			**X**	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?			**X**	
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?			**X**	
e) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?			**X**	
f) Otherwise substantially degrade water quality?			**X**	
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				**X**
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?				**X**

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
i) 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?				**X**
j) Cause inundation by seiche, tsunami, or mudflow?			**X**	

a) Would the project violate any water quality standards or waste discharge requirements?

Less Than Significant Impact

The project site is developed and contains a mix of impervious surfaces, including asphalt and concrete, as well as porous surfaces, including landscaping. Under existing conditions, stormwater runoff generated on the project site is collected and conveyed by curbs and gutters to an existing 30-inch reinforced concrete pipe located within the adjacent roadway right of way for McKenzie Avenue (Los Angeles County, Department of Public Works, n.d.).

Development of the project may result in two types of water quality impacts: (1) short-term impacts due to construction related discharges; and (2) long-term impacts from operation or changes in site runoff characteristics. Runoff may carry onsite surface pollutants to water bodies such as lakes, streams, rivers that ultimately drain to the ocean. Projects that increase urban runoff may indirectly increase local and regional flooding intensity and erosion. Below is a table showing the site coverage for the existing site conditions and the project conditions. As shown in **Table 4.9-1** below, the project would result in a 19 percent decrease in the amount of landscaped area on the project site, compared to existing conditions. Overall, impervious surfaces cover approximately 49 percent of the existing project site and with the project, the total area of impervious surfaces would be increased to 68 percent, which is an increase in impervious surfaces equal to 19 percent of the total area.

Table 4.9-1
APPROXIMATE SITE COVERAGE COMPARISONS

	Existing Conditions (SQFT)	Existing Conditions (% of total site area)	Proposed Conditions	Proposed Conditions (% of total site area)	Change as % of the total site area
Building Coverage	42,181	18.5	74,900	33	14.5% increase
Parking	26,795	12	46,300	20	8% increase
Hardscapes/ Walkways	42,035	18.5	33,965	15	3.5% increase

	Existing Conditions (SQFT)	Existing Conditions (% of total site area)	Proposed Conditions	Proposed Conditions (% of total site area)	Change as % of the total site area
Landscape Area[1]	117,154	51	73,000	32	19% decrease
Total Site Area	228,165	100	228,165	100	Not Applicable

Notes:
1 The proposed landscape area is an estimate since the landscape architect for the project does not have a final landscape plan at the time this document was written.
SQFT= Square Feet

Construction Pollutants Control

Construction projects typically expose soil to erosion and may temporarily alter drainage patterns. Storm water runoff during construction may contain soil amendments such as fertilizers and pesticides, entrained soil, trash, waste oil, paints, solvents and other substances used during construction. § 402 of the federal CWA requires dischargers of potential pollutants into Waters of the United States (WOUS) to: (1) implement best management practices (BMPs) to eliminate or reduce point and non-point source discharges of pollutants, and (2) if one acre or more of soil is disturbed during construction, to prepare a site-specific Stormwater Pollution Prevention Plan (SWPPP) to protect human health and the environment and obtain a National Pollutant Discharge Elimination System (NPDES) permit. NPDES permits establish enforceable limits on discharges, require effluent monitoring, designate reporting requirements, and require construction and post-construction BMPs to eliminate or reduce point and non-point source discharges of pollutants.

The project would be required to implement BMPs, to prepare a SWPPP and obtain an NPDES permit. For these reasons, potential violations of water quality standards or waste discharge requirements would be less than significant during project construction.

Operational Pollutant Controls

NPDES Municipal Stormwater Permits require new development and significant redevelopment projects to incorporate post-construction BMPs to comply with the local Standard Urban Stormwater Mitigation Plan (SUSMP) or Water Quality Management Plan (WQMP) to reduce the quantity of rainfall runoff and improve the quality of water that leaves a site. The project would be required to incorporate operational BMPs in compliance with City of Los Angeles SUSMP permit requirements. The entire project site is nearly covered by asphalt, concrete, or structures, except for strips of landscaping along project site boundaries, within the parking lot and near the existing building entrance. The project would contain both pervious areas such and landscaping and impervious areas such as paved areas for vehicle parking. However, runoff from the project site would be in accordance with the "Stormwater Treatment and Use" low impact development (LID)BMPs detailed in the City of Los Angeles' LID Ordinance. The project would also be subject to review by the City of Los Angeles for compliance with the City's BMP Handbook, Part B: Planning Activities.

LID is a leading stormwater management strategy that seeks to mitigate the impacts of runoff and stormwater pollution as close to its source as possible. LID comprises a set of site design approaches and BMPs that are designed to address runoff and pollution at the source. These LID practices can effectively remove nutrients, bacteria, and metals while reducing the volume and intensity of stormwater flows. Los Angeles' LID ordinance became effective in May 2012. The main purpose of

this law is to ensure that development and redevelopment projects mitigate runoff in a manner that captures rainwater at its source, while utilizing natural resources (LA Stormwater, 2018). The project is subject to the City's LID ordinance because it proposes a housing development of 10 or more dwelling units.

The existing Rose Hill Courts project was built in the 1940s and as such, is not subject to the City's current LID Ordinance. However, because the project would result in an alteration of at least fifty percent or more of the impervious surfaces on an existing developed site, the entire site must comply with the standards and requirements of this Article and with the Development BMPs Handbook (City of Los Angeles Ordinance No. 181899, 2012, p. 8). Under existing conditions stormwater flows from the project site directly into the storm drain system. In contrast, the project would improve the quality of stormwater leaving the project site because the project is subject to the City's LID ordinance as well as the City's Development BMPs Handbook.

The project's required compliance with the City's LID ordinance would result in less than significant impacts in this regard 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. This will not be analyzed further in the EIR/EIS that will be prepared for the project.

b) Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Less Than Significant Impact

The majority of the City receives domestic water service from the LADWP. LADWP's goal is to ensure that the City's water quality and demand are met by available water supplies. The primary sources of water supply for the City of Los Angeles are the Los Angeles Aqueducts, local groundwater, recycled water and supplemental water purchased from the Metropolitan Water District of Southern California (MWD). Water from the MWD is delivered through the Colorado River Aqueduct and the State Water Project's California Aqueduct. From 2000-2015 groundwater has provided approximately 12 percent of the total water supply for the City of Los Angeles (Los Angeles Department of Water & Power, Urban Water Management Plan, 2015, p. 6-1).

The project site is currently developed with impervious surfaces including areas on site covered by buildings and paved pathways and the driveway that bisects the project site, all of which limit groundwater infiltration at the project site. As detailed in threshold 4.9 a) above, the project would result in a decrease in the amount of landscaped area compared to existing conditions. Overall, impervious surfaces cover approximately 49 percent of the existing project site and with the project, the total area of impervious surfaces increase to 68 percent, which is a 19 percent increase in impervious surfaces. The limited size of the project site reduces its potential to contribute to groundwater recharge. Therefore, development of the project would not substantially modify the amount of groundwater infiltration and recharge on the project site. 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 have a less than significant impact in this regard. This will not be analyzed further in the EIR/EIS that will be prepared for the project.

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact

No streams, rivers, or drainage channels that contribute runoff to the local drainage network would be impacted by the project (Google Earth Pro, 2018), During project construction the drainage pattern of the site would be altered. However, the project would have a less than significant impact because project construction would not result in substantial erosion or siltation. The project would be required to prepare a SWPP and obtain an NPDES permit for construction. The SWPPP would be reviewed by the City of Los Angeles to ensure that it complies with the City's BMP Handbook regarding construction activities. Additionally, as part of the project's regulatory requirements, BMPs would be required to be implemented to control erosion and protect the quality of surface water runoff from the project site. Construction projects that disturb an area of one acre and greater (this includes the project) are required to prepare a Wet Weather Erosion Control Plan (WWECP) if the soil will be disturbed during the rainy season and a Local SWPPP. The project would be subject to these requirements should the soil be disturbed during the rainy season. The Local SWPPP must be prepared before the project owner, developer, or contractor receives a grading or building permit and must be implemented year-round throughout construction. A WWECP must be prepared prior to each rainy season and must be implemented throughout that rainy season (LADWP, n.d., p. D2). Project compliance with regulatory requirements would reduce potential erosion/siltation impacts during the construction phase of the project to a less than significant level.

Development of the project would add impervious surfaces to the project site which would alter the existing drainage pattern of the project site. The project site is currently developed with impervious surfaces and development of the project site would not result in a substantial alteration from existing conditions with the exception that stormwater runoff from the project site would be subject to City's LID ordinance as well as the City's Development BMPs Handbook.

The existing site conditions and drainage infrastructure includes: one (1) curb catch basin along Florizel Street (some 100 feet west of Mackenzie Ave); two (2) catch basins along the driveway (at Mackenzie Avenue), and two (2) curb catch basins at the site's southeast corner (along Mercury Avenue and Mackenzie Avenue). The proposed project grading/drainage design intends to re-use these existing catch basin features and/or possibly replace with new basin structures in similar locations. The existing site's general drainage pattern (from northwest to southeast) will not change with the new onsite improvements; and with that existing street drainage scheme will not be significantly altered. 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.

The project would be required to, to infiltrate, evapotranspire, store for use, and/or treat through a high removal efficiency biofiltration/biotreatment system, without any stormwater runoff leaving the site to the maximum extent feasible. The proposed project would be designed in compliance with all applicable City of Los Angeles regulations regarding stormwater runoff and the project would be reviewed by the City of Los Angeles Department of Public Works to ensure that the development would not create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff. The project applicant is responsible for providing the necessary storm drain infrastructure to serve the

proposed project as well as any necessary extensions to the existing storm drain system in the project area. Thus, the project would have less than significant impact regarding exceedance of storm drain system capacity or the generation of polluted runoff.

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. Additionally, the project would be required to implement best management practices (BMPs) in compliance with the City of Los Angeles' low impact development (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. This will not be analyzed further in the EIR/EIS that will be prepared for the project.

d) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Less Than Significant Impact

The project would redevelop the site with impervious surfaces such as parking areas and buildings. The Los Angeles RWQCB developed requirements for the SUSMP, which requires specific development and redevelopment categories to manage stormwater runoff. In 2002, the City of Los Angeles implemented the SUSMP program requiring all the affected land development projects to capture or treat stormwater runoff (City of Los Angeles Development BMPs Handbook, 2011 p. 3). The project would be required to comply with the LA Development BMPs Handbook which states (City of Los Angeles Development BMPs Handbook, 2011 p. 17):

"The onsite stormwater management techniques must be properly sized, at a minimum, to infiltrate, evapotranspire, store for use, and/or treat through a high removal efficiency biofiltration/biotreatment system, without any stormwater runoff leaving the site to the maximum extent feasible, for at least the volume of water produced by the water quality design storm event that results from:

i. The 85th percentile 24-hour runoff event determined as the maximized capture stormwater volume for the area using a 48 to 72-hour drawdown time, from the formula recommended in Urban Runoff Quality Management, WEF Manual of Practice No. 23/ASCE Manual of Practice No. 87, (1998); or

ii. The volume of annual runoff based on unit basin storage water quality volume, to achieve 80 percent or more volume treatment by the method recommended in the California Stormwater Best Management Practices Handbook – Industrial/Commercial, (2003); or

iii. The volume of runoff produced from a 0.75-inch storm event.

Runoff from the project site would be in accordance with the "Stormwater Treatment and Use" LID mitigation method detailed in the City of Los Angeles' LID Ordinance. The project would also be

subject to review by the City of Los Angeles for compliance with the City's BMP Handbook, Part B: Planning Activities. 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. As such, 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.

e) Would the project create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact

The project would redevelop the site with impervious surfaces such as parking areas and buildings. As described in thresholds 4.9 c) and d) above, the project would be required to, to infiltrate, evapotranspire, store for use, and/or treat through a high removal efficiency biofiltration/biotreatment system, without any stormwater runoff leaving the site to the maximum extent feasible. 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. The project would be designed in compliance with all applicable City of Los Angeles regulations regarding stormwater runoff and the project would be reviewed by the City of Los Angeles Department of Public Works to ensure that the development would not create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff. The project applicant is responsible for providing the necessary storm drain infrastructure to serve the project as well as any necessary extensions to the existing storm drain system in the project area. Thus, the project would have less than significant impact regarding exceedance of storm drain system capacity or the generation of polluted runoff. This will not be analyzed further in the EIR/EIS that will be prepared for the project.

f) Would the project otherwise substantially degrade water quality?

Less Than Significant Impact

The project would involve ground-disturbing activities which may potentially result in the discharge of sediment from the project site. The presence and use of construction vehicles and equipment may also have the potential to discharge other pollutants from the project site during the construction phase. However, with the implementation of standard stormwater construction BMPs, the potential for sediment and other pollutants to leave the project site and enter storm drain inlets would be less than significant. During the operational phase of the project, which proposes multi-family residential land use, the project would not otherwise substantially degrade water quality. This will not be analyzed further in the EIR/EIS that will be prepared for the project.

g) Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

h) Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

No Impact

The project site is in Federal Emergency Management FEMA Flood Insurance Rate Map (FIRM), Zone X (Refer to **Figure 4.9-1**), which is outside the 100-year flood zone (Panel 06037C1629F) (FEMA, 2008). FIRM Zone X containing the project site is characterized as moderate to low risk areas for FEMA flood hazard zones. Flood Zone X identifies "areas outside the one percent annual chance floodplain, areas of one percent annual chance sheet flow flooding where average depths are less than one foot, areas of one percent annual chance stream flooding where the contributing drainage area is less than one square mile, or areas protected from the one percent annual chance flood by levees." (FEMA, 2011) Therefore, the project would not place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary, FEMA FIRM, or other flood hazard delineation map. No impacts to housing or flood-flow as a result of the project is anticipated. This will not be analyzed further in the EIR/EIS that will be prepared for the project.

i) Would the project 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?

No Impact

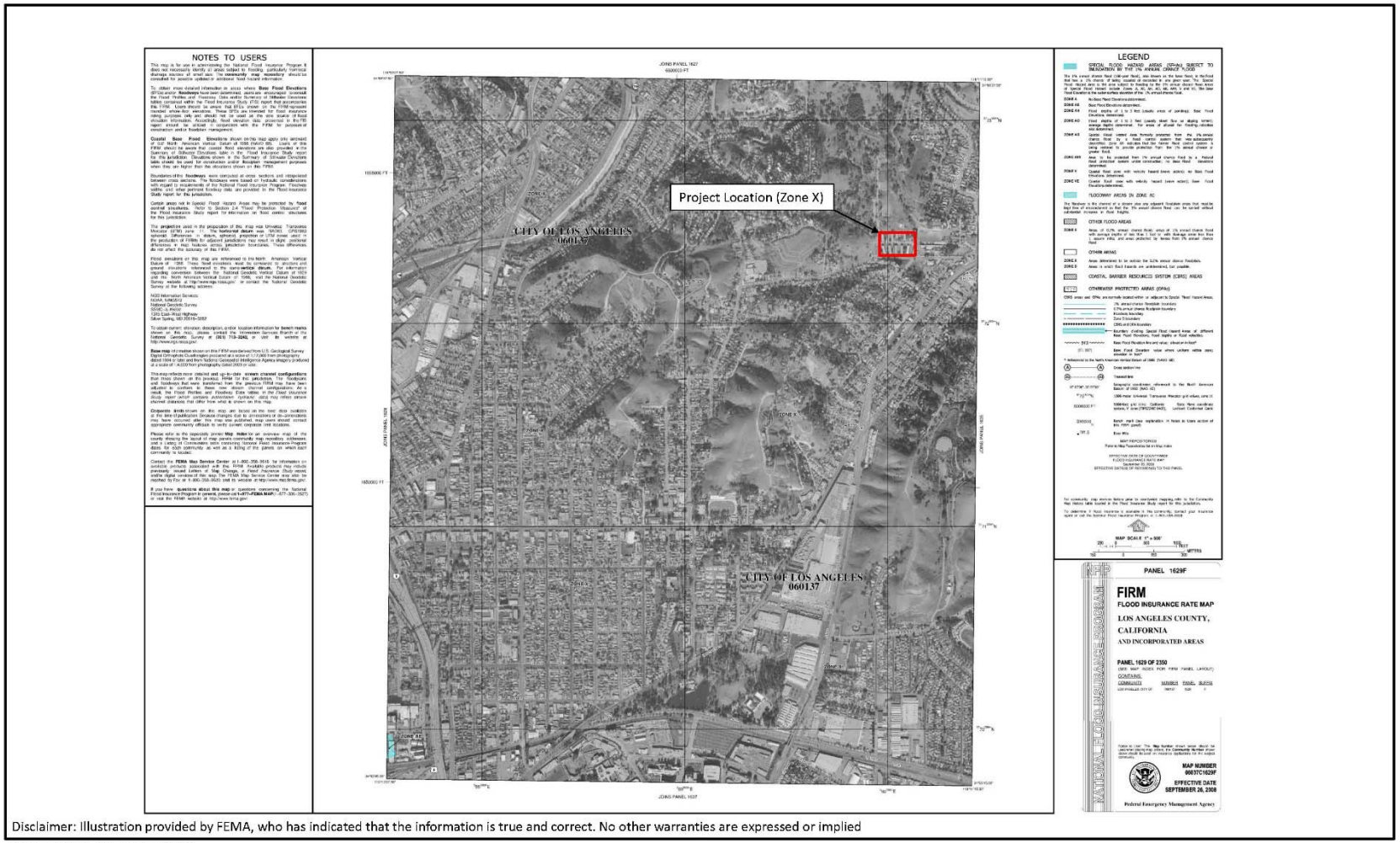
The project site is not within a 100-year flood hazard area. The nearest dam, the Elysian Reservoir dam, is approximately two miles southwest of the project site (Army Corps of Engineers, n.d.). According to the California Emergency Management Agency, the project site is in or near an area of low hazard for flooding. No people or structures would be exposed to a significant risk of loss or death involving flooding, including flooding as a result of the failure of a levee or dam. The City's General Plan Safety Element includes Exhibit G which is an inundation exhibit showing the areas of potential flooding in the event of dam failure. The City Department of Water and Power provides dam failure inundation maps to the State Office of Emergency Services via the County of Los Angeles. These maps are the basis of County inundation maps, which were a resource for preparation of the inundation exhibit (Exhibit G) in the City's General Plan Safety Element (City of Los Angeles General Plan, 2015, p. I-4). Additionally, per the Geotechnical Investigation prepared for the project site, the project site is not located within a designated dam inundation area. Therefore, the potential for inundation at the project site, as a result of an earthquake-induced dam failure is considered low (Geocon, 2018, p. 9). Thus, 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. This will not be analyzed further in the EIR/EIS that will be prepared for the project.

j) Would the project cause inundation by seiche, tsunami, or mudflow?

Less Than Significant Impact

A seiche is an oscillating wave in a closed or partially closed water body such as a river, lake, reservoir, pond, and other large inland water body caused by wind, tidal forces, earthquakes, landslides and other phenomena. Tsunamis are long wave-length, earthquake-generated ocean waves. Mudflows are fast-moving landslides composed of mud and debris, typically caused by heavy rainfall or melting snow on steep hillsides.

Figure 4.9-1
FEMA FLOOD INSURANCE RATE MAP



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

Source: FEMA, September 2008

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FEMA FIRM

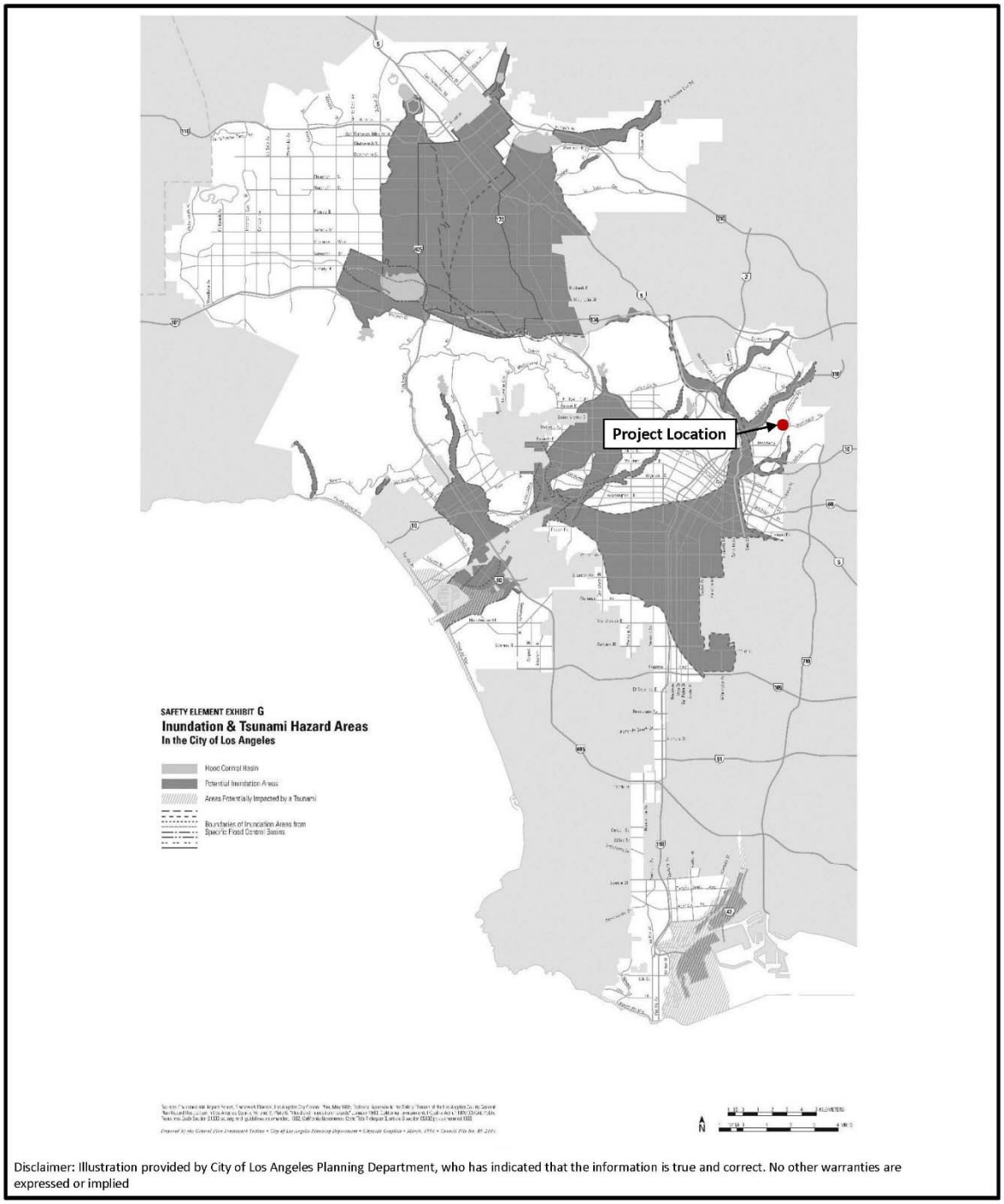
The project site is located over twenty miles inland of the Pacific Ocean. According to the California Emergency Management Agency, this location is not within a Tsunami Inundation Area for Emergency Planning, as detailed in Exhibit G of the City's General Plan Safety Element (See **Figure 4.9-2**). (City of Los Angeles General Plan, 2015). The project site is not located within a coastal area. Therefore, tsunamis, seismic sea waters are not considered a significant hazard at the site (Geocon, 2018, p. 9). This will not be analyzed further in the EIR/EIS that will be prepared for the project.

No major water-retaining structures are located at a higher gradient, near the project site. Therefore, flooding from seismically induced seiche is considered unlikely (Geocon, 2018, p. 9). This will not be analyzed further in the EIR/EIS that will be prepared for the project.

The project site is within an area of minimal flooding (Zone X) as defined by the Federal Emergency Management Agency (FEMA) (Geocon, 2018, p. 9). Therefore, impacts in this regard would be less than significant.

The project site is not mapped within a landslide hazard zone in the state Seismic Hazard Zone Report (USGS, 1994). Land at 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. Based on the findings of the geotechnical report prepared for the project (refer to **Appendix C** of this document) there are no known landslides near the site, nor is the site in the path of any known or potential landslides. Thus, the probability of slope stability hazards affecting the site is considered very low (Geocon, 2018, p. 9). Therefore, the potential for landslides or mud debris flows within or near the project site is considered less than significant. For these reasons, no impacts from inundation by a seiche or tsunami are expected and less than significant impacts from mudflow are anticipated. This will not be analyzed further in the EIR/EIS that will be prepared for the project.

Figure 4.9-2
INUNDATION AND TSUNAMI HAZARD AREAS



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: Safety Element of Los Angeles, City General Plan, 1996

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Inundation and Tsunami Hazard Areas

4.10 Land Use and Planning

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Physically divide an established community?			**X**	
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	**X**			
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?				**X**

a) Would the project physically divide an established community?

Less Than Significant Impact

The project would not divide existing public spaces in the vicinity of the project site or extend beyond the project site's existing boundaries. Furthermore, no streets or sidewalks would be permanently closed as a result of the development. The existing driveway that bisects the project site would be removed as part of the project because the area where the driveway currently exists would be developed with landscaping, parking, and housing, as detailed on the project site plan. 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. Therefore, the project would not physically divide an established community and no impacts would occur. This will not be analyzed further in the EIR/EIS that will be prepared for the project.

b) Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Potentially Significant Impact

The project site is designated as Low Medium I by the Northeast Community Plan, which per page III-38 of the Community Plan, has corresponding zones of RD2, RD3, RD4, RZ3, RZ4, and RU. 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 would alter building coverage on the lot and would increase the number of residents on the project site compared to existing conditions. 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. This will be analyzed in the EIR/EIS to be prepared for the project.

c) Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact

The project site does not lie within an area covered by a habitat conservation plan or natural community conservation plan. As shown in **Figure 4.10-1**, no significant ecological areas are located near the project. Therefore, no impact would occur as a result of project implementation.

The project site does not contain habitat that supports any special status species, and no wetlands or riparian habitats are found on site. For these reasons, the project would be compatible with California Wetlands Policy, and the California Endangered Species Act. This will not be analyzed further in the EIR/EIS that will be prepared for the project.

Figure 4.10-1
SIGNIFICANT ECOLOGICAL AREAS

4.11 Mineral Resources

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				**X**
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				**X**

a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?

b) Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

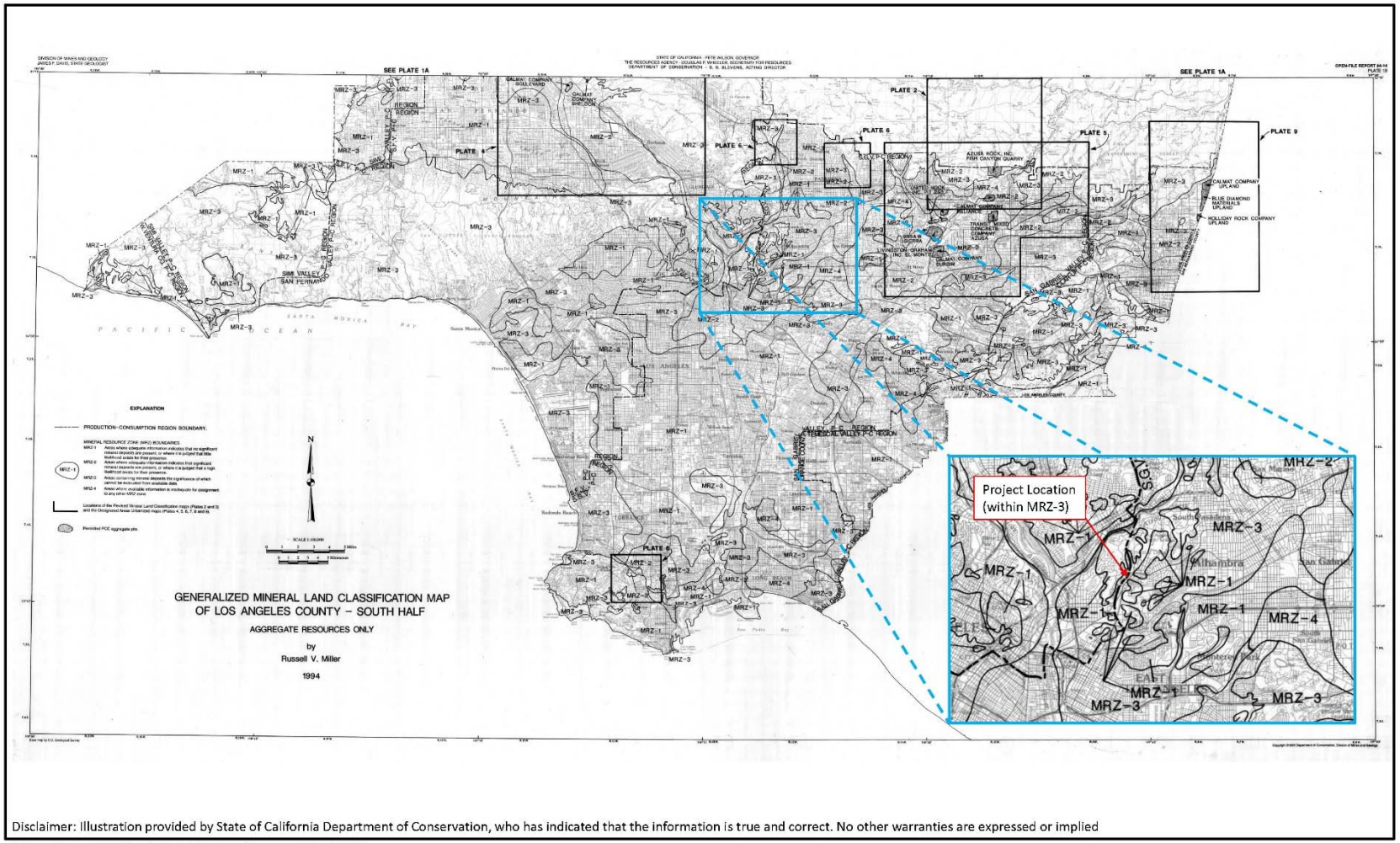
No Impact

Potential impact to mineral resources in the vicinity of the project site was evaluated by reviewing:

(1) The Conservation Element of the City of Los Angeles General Plan (City of Los Angeles General Plan, 2015);
(2) The California Department of Conservation Surface Mining and Reclamation Act of 1975 (SMARA) Mineral Land Classification Map for County of Los Angeles (Miller, Russel. V., 1994);
(3) Part II: Mineral Land Classification of the Greater Los Angeles Area: Classification of Sand and Gravel Resource Areas, San Fernando Valley Production-Consumption Region (DOC, 2015);
(4) The California Department of Conservation Division of Oil, Gas, & Geothermal Resources Well Finder (DOC, 2017); and,
(5) The USGS online Mineral Resources Data System (MRDS) (USGS, n.d.).

According to (1) the Conservation Element of the City of Los Angeles General Plan, (2) the Part II: Mineral Land Classification of the Greater Los Angeles Area: Classification of Sand and Gravel Resource Areas, San Fernando Valley Production-Consumption Region, and (3) the SMARA Generalized Mineral Land Classification Map for County of Los Angeles, 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 (**Figure 4.11-1**). The closest USGS MRDS resource is mapped approximately 4,800 feet west of the project site. No other mining activities exist in the vicinity of the project site. No oil or gas wells were identified on or within one mile of the project site; see **Figure 4.11-2**.

Figure 4.11-1
MINERAL RESOURCES



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Source: State of California Department of Conservation, 1994

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Designated Mineral Resource Zones

Figure 4.11-2
OIL AND GAS WELLS

The project site has been used for multi-family housing since the 1940's and would continue to be used for housing after development of the 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. This will not be analyzed further in the EIR/EIS that will be prepared for the project.

4.12 Noise

Would the project result in:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Exposure of persons to or generation of noise level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	**X**			
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	**X**			
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	**X**			
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	**X**			
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 expose people residing or working in the project area to excessive noise levels?				**X**
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				**X**

a) Would the project expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Potentially Significant Impact

A significant impact may occur if the project would generate excess noise that would cause the ambient noise environment at the project site to exceed noise level standards set forth in the City of Los Angeles General Plan Noise Element (Noise Element) and the City of Los Angeles Noise Ordinance (Noise Ordinance). See § 111.00 through § 116.01 of the LAMC, and LAMC § 41.40. The project has the potential to generate noise and as such, construction and/or project operation has the potential to generate noise which could exceed HUD noise threshold levels of 45 A-weighted decibels (dBA) interior and 65 dBA exterior. The project has the potential to generate noise both during the construction phase (from construction equipment) and the operational phase (from persons residing at the project site). This will be analyzed in the EIR/EIS to be prepared for the project.

b) Would the project expose persons to or generate excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact

Construction activities for the project have the potential to generate low levels of groundborne vibration. The operation of construction equipment generates vibrations that propagate though the ground and diminishes in intensity with distance from the source. Vibration impacts can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage of buildings at the highest levels. The construction activities associated with the project could have an adverse impact on both sensitive structures (i.e., building damage) and populations (i.e., annoyance). This will be analyzed in the EIR/EIS to be prepared for the project.

c) Would the project cause a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Potentially Significant Impact

A significant impact may occur if the project were to result in a substantial permanent increase in ambient noise levels above existing ambient noise levels. As defined in the City of Los Angeles CEQA Thresholds Guide threshold for operational noise impacts, a project would normally have a significant impact on noise levels from project operations if the project causes the ambient noise level measured at the property line of affected uses to increase by 3 dBA CNEL to or within the "normally unacceptable" or "clearly unacceptable" category, or any 5-dBA or greater noise increase. Thus, a significant impact would occur if noise levels associated with operation of the project would increase the ambient noise levels by 3 dBA CNEL at homes where the resulting noise level would be at least 70 dBA CNEL. In addition, any long-term increase of 5 dBA CNEL or more is considered to cause a significant impact. This will be analyzed in the EIR/EIS to be prepared for the project.

d) Would the project cause a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Potentially Significant Impact

The project would demolish the existing units at the project site and construct additional units which would allow more people to live on the project site compared to existing conditions. The project's potential to cause a substantial temporary or periodic increase in ambient noise levels will be analyzed in the EIR/EIS to be prepared for the project.

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 expose people be residing or working in the project area to excessive noise levels?

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No Impact

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 AIA 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. This will not be analyzed further in the EIR/EIS that will be prepared for the project.

4.13 Population and Housing

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			**X**	
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	**X**			
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	**X**			

a) Would the project induce substantial growth in an area either directly (for example, by proposing new homes and business) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact

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 Rose Hill Courts project is located within the NECP Area, which encompasses 24,210 square miles. According to the 2010 U.S. Census (U.S. Census Bureau, 2010), the project site is located within Census Tract 2013.01.

The project proposes to increase the number of persons living on the project site, compared to existing conditions. However, 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.

The project would generate 282 permanent residents in the first phase of development and 350 permanent residents in the second phase of development (Related, 2018), resulting in a total of 632 residents, which is 412 more residents, compared to August 2018 conditions. Refer to **Table 4.13-1** below for details. All 191 dwelling units would be reserved as restricted affordable units. This increase in housing, specifically as it relates to affordable housing, is consistent with City of

Los Angeles and Southern California Association of Governments (SCAG) growth projections and would not result in any significant impacts associated with substantial growth, as described below.

Table 4.13-1
ESTIMATED PROJECT POPULATION AND UNIT MIX BY PHASE

Phase I			
No. of Bedrooms	**No. of Units**	**Persons per Unit**	**Total**
1 Bedroom	60	2	120
2 Bedroom	25	4	100
3 Bedroom	5	6	30
4 Bedroom	4	8	22
Phase I Total	94	--	282
Phase II			
No. of Bedrooms	**No. of Units**	**Persons per Unit**	**Total**
1 Bedroom	42	2	84
2 Bedroom	36	4	144
3 Bedroom	15	6	90
4 Bedroom	4	8	32
Phase II Total	97	--	350
GRAND TOTAL	191	--	632

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 General Plan Housing Element, 2013 p. 1-4). The project's estimated 412 net new 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.

SCAG is the nation's largest metropolitan planning organization, representing six counties, 191 cities and more than 18 million residents. The SCAG region encompasses the following counties: Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura. The SCAG area covers more than 38,000 square miles (SCAG, 2018). On April 7, 2016, SCAG's Regional Council adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS or Plan). The Plan is a long-range visioning plan that balances future mobility and housing needs with economic, environmental and public health goals (SCAG, 2016). SCAG is tasked with providing the Regional Housing Needs Assessment (RHNA) allocation, but housing elements are reviewed and approved by the California Department of Housing and Community Development (SCAG, 2016, p. 25). The SCAG RTP/SCS states that affordable housing needs have not been met in the SCAG region:

"For our region, the most recent RHNA allocation, also known as the fifth RHNA cycle, was adopted by the SCAG's Regional Council in October 2012 and it covers a projection period between January 2014 and October 2021. The RHNA allocation breaks down housing needs into four income categories: very low (less than 50 percent of the county's median income); low (50 to 80 percent of the median); moderate (80 to 120 percent); and above moderate (more than 120 percent). For the fifth RHNA cycle, 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. However, although these housing units are planned and zoned for, available data sources indicate that the supply of affordable housing has not met needs…" (SCAG, 201, p. 22)

As described in the City of Los Angeles General Plan:

"There is a tremendous demand for the [Housing Authority of the City of Los Angeles] HACLA's housing assistance, as demonstrated by the more than 29,607 families on the public housing waiting list (as of October 2012) and the more than 7,779 families on the Section 8 tenant-based assistance waiting list in 2012. Of this population, 94 percent and 86 percent of the families, respectively, were of extremely low income." (City of Los Angeles General Plan Housing Element, 2013, p. 1-55).

The project would help meet the City of Los Angeles' need for affordable housing. Therefore, impacts on population and housing would be less than significant.

Construction of each phase of the project is expected to take 18 to 42 months and is estimated employ five to 75 construction workers onsite during site preparation and building construction; therefore, this would temporarily increase construction employment. Given the relatively common nature and scale of the construction associated with the project, the demand for construction employment would likely be met within the existing and future labor market in the County of Los Angeles. Size of the construction workforce would vary during different stages of construction, but the quantity of workers within the County would not be expected to relocate permanently to this area. Therefore, the project would not directly or indirectly induce growth in Los Angeles, and no impact would occur. This will not be analyzed further in the EIR/EIS that will be prepared for the project.

b) Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

Potentially Significant Impact

The existing housing units would be demolished under the project, and some of the existing residents would temporarily be displaced. This will be analyzed in the EIR/EIS to be prepared for the project.

c) Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

Potentially Significant Impact

The project would demolish all of the existing housing on site, necessitating the temporary displacement of some existing residents. This will be analyzed in the EIR/EIS to be prepared for the project.

4.14 Public Services

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
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 any of the public services:				
a) Fire protection?	**X**			
b) Police protection?	**X**			
c) Schools?			**X**	
d) Parks?	**X**			
e) Other public facilities?	**X**			

a) Fire protection?

Potentially Significant Impact

Implementation of the project has the potential to adversely affect the City's existing fire protection services because the project would add additional dwelling units and persons to the project site. This will be analyzed in the EIR/EIS to be prepared for the project.

b) Police protection?

Potentially Significant Impact

Implementation of the project has the potential to adversely affect the City's existing police protection services because the project would add additional dwelling units and persons to the project site. This will be analyzed in the EIR/EIS to be prepared for the project.

c) Schools?

Less Than Significant Impact

The project site is located within the LAUSD. The LAUSD enrolls more than 640,000 students in kindergarten through 12th grade, at over 900 schools, and 187 public charter schools (LAUSD, 2018a). The project site is located within the Board of Education District #2. LAUSD schools serving the project site include: Glen Alta Elementary (grades K-8), Abraham Lincoln Senior High (grades 9-12), and Woodrow Wilson Senior High (9-12) (LAUSD, 2018b). Glen Alta Elementary had an enrollment of 177 students during the 2017-2018 school year, Abraham Lincoln Senior High had an enrollment of 1,104 students during the 2017-2018 school year, and Woodrow Wilson Senior High had an enrollment of 1, 458 students during the 2017-2018 school year (LAUSD, 2018c). Our Lady of Guadalupe School is a private, TK-8, Catholic school, located across the street from the project site at 4522 Browne Avenue.

Implementation of the project has the potential to add students to the LAUSD's school facilities because the project would add additional dwelling units that could result in additional students residing at the project site. The project would be required to pay applicable school impact fees to the LAUSD. Therefore, potential impacts to schools would be less than significant. This will not be analyzed further in the EIR/EIS that will be prepared for the project.

d) Parks?

Potentially Significant Impact

Recreational services within the City of Los Angeles, are provided by the City's Department of Recreation and Parks, 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).

Multiple recreational facilities exist in the project vicinity. The project site is located adjacent to (across Florizel Street) from 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 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)

The addition of 412 net people to the project site (compared to existing conditions) could potentially result in direct and/or cumulative impacts to the recreational amenities and parks in the vicinity of the project site. This will be analyzed further in the EIR/EIS that will be prepared for the project.

e) Other Public Facilities?

Potentially Significant Impact

Library services within the City are provided by the Los Angeles Public Library (LAPL). There are 64 public libraries with a cumulative of 940,963 square feet of building area. The State of California standard is based upon 0.5 square feet of library facility per capita. The LAPL System provides library services at the Central Library, eight regional branch libraries, 67 community branches and four bookmobiles. 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 (City of Los Angeles, 2006). The project is estimated to result in an increase of 412 persons to the project site than exist as of August 2018. The project's increase in population of approximately 412 persons has the potential to significantly impact library facilities. This issue will be further analyzed in the EIR/EIS to be prepared for the project.

4.15 Recreation

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) 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?	**X**			
b) 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?	**X**			

a) 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?

Potentially Significant Impact

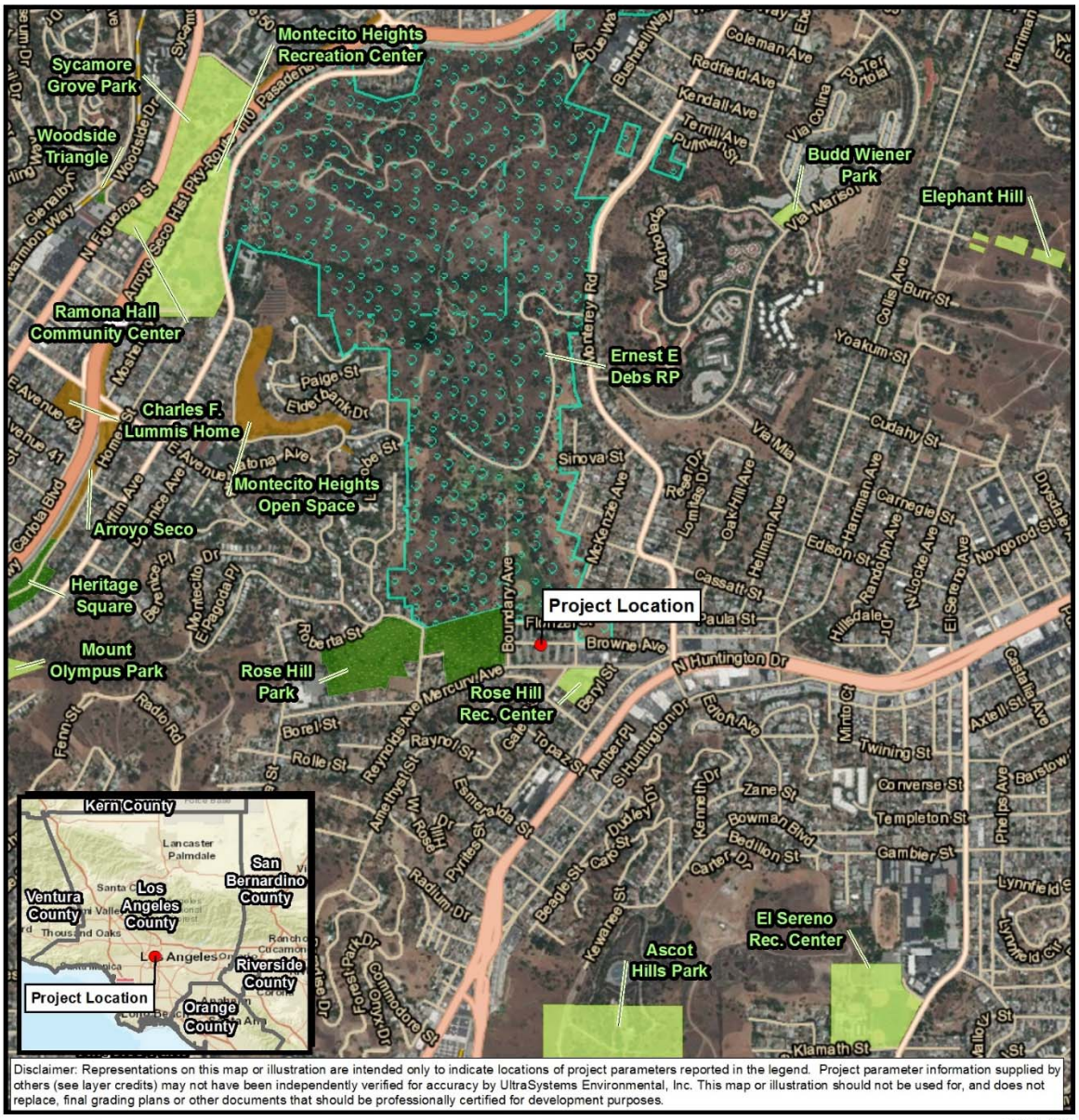
The project is anticipated to result in an increase the use of existing neighborhood parks, regional parks or other recreational facilities (Depicted in **Figure 4.15-1** and **Figure 4.15-2**) because the project is anticipated to add a total of 632 people to the project site, which is approximately 412 more persons than exist under existing (August 2018) conditions. The project's added population could potentially result in direct and/or cumulative impacts to the recreational amenities and parks in the vicinity of the project site. This will be analyzed further in the EIR/EIS that will be prepared for the project.

b) 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?

Potentially Significant Impact.

The project is estimated to result in an increase of 412 net persons to the project site than exist under existing (August 2018) conditions. The addition of approximately 400 people to the project site would increase the demand for recreational resources. This issue will be analyzed further in the EIR/EIS that will be prepared for the project.

Figure 4.15-1
NEARBY PARKS AND RECREATIONAL FACILITIES



Path: J:\Projects\6022A_HACLA_Rose_Hill\MXDs\IS_MND\6022A_HACLA_4_15_Parks_and_Rec_2018_03_01.mxd
March 1, 2018

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, 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

Scale 1:15,840

N

0 0.25 Miles

0 0.25 Kilometers

Legend

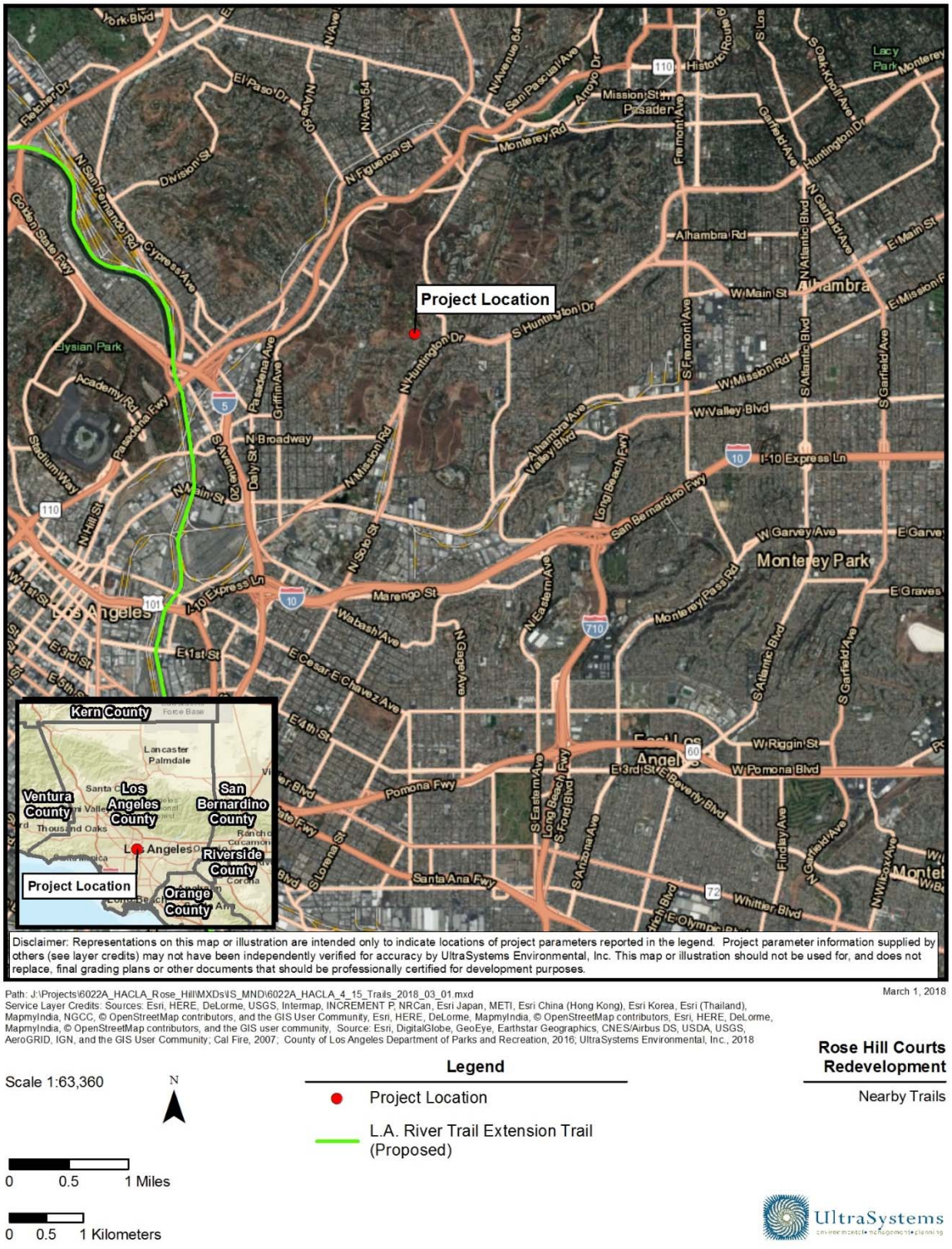
- Project Location
- Local Park
- Natural Areas
- Regional Open Space
- Regional Recreation Park

Rose Hill Courts Redevelopment

Nearby Parks and Recreational Facilities

UltraSystems

Figure 4.15-2
NEARBY TRAILS



4.16 Transportation and Traffic

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	**X**			
b) Conflict with an applicable congestion management program, including, but not limited to level of service (LOS) standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	**X**			
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location, which results in substantial safety risks?				**X**
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				**X**
e) Result in inadequate emergency access?	**X**			
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	**X**			

a) Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Potentially Significant Impact

During the construction period, the project would generate temporary construction-related truck and automobile traffic. Traffic during the construction phase would include construction workers traveling to and from the project site, trucks hauling construction materials to the site, and transporting material away from the site. Additionally, the project would generate vehicle trips from project operations. Potential construction and operational traffic impacts of the project will be analyzed in the EIR/EIS to be prepared for the project.

b) 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?

Potentially Significant Impact

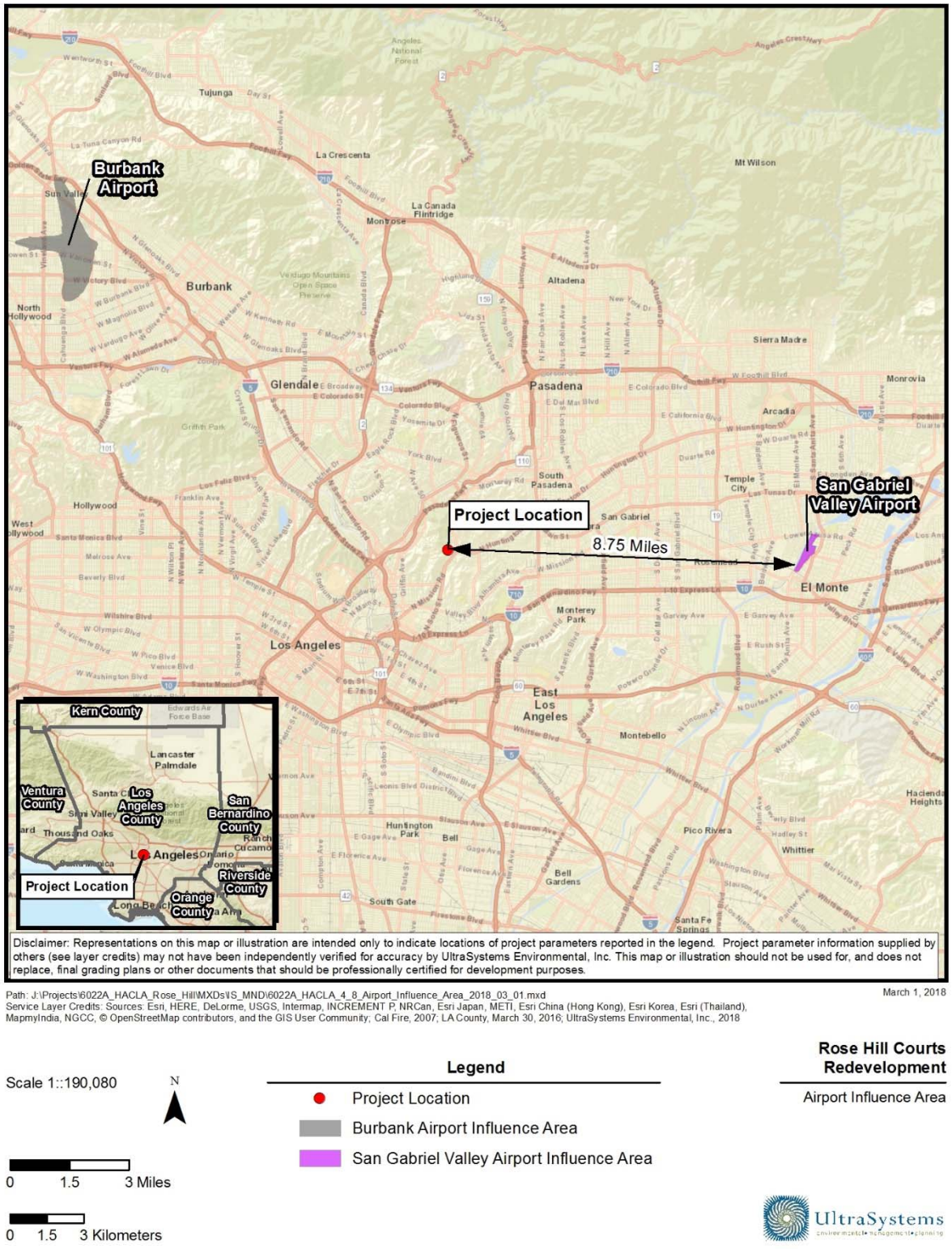
The Los Angeles County Congestion Management Program (CMP) requires evaluation of all CMP arterial monitoring intersections where the project adds 50 or more new peak hour trips. The nearest CMP monitoring intersection is the Valley Boulevard/Interstate-710 (I-710) northbound off-ramp. Similarly, the CMP requires CMP freeway mainline monitoring locations to be evaluated when the project would add 150 or more trips at the monitoring location. The nearest CMP freeway monitoring station is located on State Route 110 (SR 110), at Pasadena Avenue. The project would generate vehicle trips from project operations because the additional units proposed on the project site would result in additional vehicle trips during project operations. This will be analyzed in the EIR/EIS to be prepared for the project.

c) Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location, which results in substantial safety risks?

No Impact

The project site is not located within two miles of a public airport or public use airport or in the vicinity of a private airstrip. The nearest commercial airports, San Gabriel Valley Airport and Burbank Airport are located approximately nine miles east and twelve miles northwest of the project site, respectively. Furthermore, the project site is not located within AIA for San Gabriel Valley and Burbank airports, established by the Los Angeles County ALUC (Refer to **Figure 4.16-1**). The project proposes residential land uses, which are not of a nature that would impact air traffic patterns. Therefore, the project would not result in a change in air traffic patterns that would result in safety risks and no impact would occur. This will not be analyzed further in the EIR/EIS that will be prepared for the project.

Figure 4.16-1
AIRPORT INFLUENCE AREAS



d) Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

No Impact

Access to the project site would be provided via a driveway along Boundary Avenue, Mercury Avenue, Mackenzie Avenue, and two driveways along Florizel Street. These driveways would allow for two-way travel. 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. This will not be analyzed further in the EIR/EIS that will be prepared for the project.

e) Would the project result in inadequate emergency access?

Potentially Significant Impact

The project would alter the project site access from exiting conditions by adding additional driveways and by altering the site layout. This will be analyzed in the EIR/EIS to be prepared for the project.

f) Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Potentially Significant Impact

The project would alter the project site access from exiting conditions by adding additional driveways and by altering the site layout. The increase in onsite population could result in increased demand for transit, bicycle, or pedestrian facilities. This will be analyzed in the EIR/EIS to be prepared for the project.

4.17 Tribal Cultural Resources

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:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) 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)?	**X**			
b) 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 Resources Code § 5024.1(c)?	**X**			

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource that is 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)?

Potentially Significant Impact

The project involves demolition of the existing onsite structures and development of the new units on the project site. During the course of project construction grading and ground disturbance would occur. The site is sloped, and due to the terraced nature of the proposed development, some structures will be tucked into slopes, which has the potential to impact previously undiscovered tribal cultural resources. This will be analyzed in the EIR/EIS to be prepared for the project.

b) Would the project cause a 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 pursuant to the criteria set forth in subdivision (c) of Public Resource Code § 5024.1(c)?

Potentially Significant Impact

As described in threshold 4.17a) above, the project has the potential to disturb previously undiscovered tribal cultural resources. This will be analyzed in the EIR/EIS to be prepared for the project.

4.18 Utilities and Service Systems

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board (RWQCB)?			**X**	
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			**X**	
c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			**X**	
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?			**X**	
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			**X**	
f) Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?			**X**	
g) Would the project comply with federal, state, and local statutes and regulations related to solid waste?			**X**	

a) Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board (RWQCB)?

Less than Significant Impact

The project site is currently served by existing sewer infrastructure. The project site is located in the jurisdiction of the Los Angeles Regional Water Quality Control Board (Waterboards, 2018). The Department of Public Works' BOS owns and operates the City's sanitary sewer system and is also responsible for providing sewer service to the City via backbone collection and conveyance system. Los Angeles Bureau of Sanitation (LASAN) maintains over 6,700 miles of sewer lines and 49 pumping

plants in addition to four water reclamation plants across the City, which have a combined capacity to treat 580 million gallons per day (mgd) of wastewater (LA Sanitation, 2017). The four reclamation plants include Hyperion Water Reclamation Plant (HWRP), Terminal Island Water Reclamation Plant, Donald C. Tillman Water Reclamation Plant and Los Angeles-Glendale Water Reclamation Plant. The HWRP is the city's primary reclamation plant. Wastewater generated at the project site is treated at the HWRP. An average wastewater flow rate of 275 mgd is generated in the System. The plant was designed to accommodate both dry and wet weather days with a maximum daily flow of 450 mgd and peak wet weather flow of 800 mgd (LA Sanitation, 2018b).

Wastewater generated by the project would be typical of other residential land uses in the City of Los Angeles, comprised of domestically generated wastewater. As described above, the HWRP has the capacity to treat wastewater from the project. Thus, the project would not exceed wastewater treatment requirements of the Los Angeles RWQCB. This will not be analyzed further in the EIR/EIS that will be prepared for the project.

b) Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less than Significant Impact

Sewer and water service to the project site is provided by the City of Los Angeles. The Department of Public Works' BOS owns and operates the City's sanitary sewer system. Management of water programs is through the LADWP. Wastewater treatment is discussed below, and water treatment and distribution are discussed in checklist question d below.

LASAN maintains over 6,700 miles of sewer lines and 49 pumping plants in addition to four water reclamation plants across the City, which have a combined capacity to treat 580 mgd of wastewater. The four reclamation plants include HWRP, Terminal Island Water Reclamation Plant, Donald C. Tillman Water Reclamation Plant and Los Angeles-Glendale Water Reclamation Plant. The HWRP is the city's primary reclamation plant (LA Sanitation, 2018a). Wastewater generated at the project site is treated at the HWRP. As of February 2018, an average wastewater flow rate of nearly 300 mgd is generated in the System. The plant was designed to accommodate both dry and wet weather days with a maximum daily flow of 450 mgd and peak wet weather flow of 800 mgd (LA Sanitation, 2018b).

Wastewater is collected and conveyed to the reclamation plants through a system of sewer lines ranging in size from six to 150 inches in diameter. The City's sewers are classified into two groups: primary sewers (greater than 15 inches in diameter) and secondary sewers (15 inches or smaller in diameter). The sewer lines in the project area are classified as secondary sewers. They are made of vitrified clay pipes and are eight inches in diameter. The project site lies outside of an area considered to have a constrained sewer capacity (City of Los Angeles Open Data, 2018).

The project proposes 191 units, including one, two, three, and four-bedroom units. As shown in **Table 4.18-1**, the project is estimated to generate a net amount of 11,920 GDP of effluent requiring collection and treatment at the HWRP. Effluent generated by the project is a minimal fraction (approximately .0040 percent)[4] of the HWRP's current daily flow of 300 mgd.

4 11,920 net GPD for the project divided by 300 mgd equals approximately .0040 percent (11,920/300,000,000=.00397 percent).

Table 4.18-1
ESTMATED PROJECT NET WASTEWATER GENERATION

Unit type	Generation Rate Gallons Per Day (GPD)[1]	Number of Units	Wastewater Generated (GPD)
Estimated Existing Wastewater Generation			
One Bedroom	120	28	3,360
Two Bedroom	160	48	7,680
Three Bedroom	200	20	4,000
Four Bedroom	240	4	960
	EXISTING TOTAL	**100 units**	16,000 GPD
Estimated Proposed Wastewater Generation			
One Bedroom	120	102	12,240
Two Bedroom	160	61	9,760
Three Bedroom	200	20	4,000
Four Bedroom	240	8	1,920
	PROPOSED TOTAL	**191 units**	**27,920 GPD**
	PROJECT NET INCREASE IN WASTEWATER GENERATION		11,920 GPD

Notes:
1 City of Los Angeles, LA CEQA Threshold Guide 2006, Exhibit M 2-12, Sewage Generation Factors.

The HWRP was designed to accommodate both dry and wet weather days with a maximum daily flow of 450 mgd and peak wet weather flow of 800 mgd (LA Sanitation, 2018b). The project would produce a negligible amount of wastewater compared to the plant's maximum flow. Therefore, the project would be served by the existing Hyperion Water Reclamation plant and the project would not require the construction of new wastewater treatment facilities or expansion of existing facilities and less than significant impacts are anticipated. Wastewater is collected and conveyed to the reclamation plant through a system of sewer lines ranging in size from six to 150 inches in diameter. The City's sewers are classified into two groups: primary sewers (greater than 15 inches in diameter) and secondary sewers (15 inches or smaller in diameter). The sewer lines in the project area are classified as secondary sewers. They are made of vitrified clay pipes and are eight inches in diameter (City of Los Angeles Open Data, 2018). Upon review of existing utilities and anticipated utilities in the new buildings, a utility plan will be developed in consultation with the project's utility consultant and the local service providers for wet and dry utilities. The project includes the development of sewer lines to provide an adequate wastewater flow from the project site. The sewer lines within and adjacent to the project site will convey wastewater to the HWRP. This will not be analyzed further in the EIR/EIS that will be prepared for the project.

c) Would the project require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact

The City's storm drain system comprises 67,777 catch basins, with 1,900 miles of underground pipes and 220 miles of open channels (City of Los Angeles, Floodplain Management Plan, 2015). The City's storm drains are designed to provide capacity for up to a 25-year storm.

Under existing conditions, stormwater runoff generated on the project site is collected and conveyed by curbs and gutters to an existing 30-inch reinforced concrete pipe located within the adjacent

roadway right of way for McKenzie Avenue (Los Angeles County, Department of Public Works, n.d.). The project site is not located in a FEMA flood hazard area for the 1% Annual Change Flood or the 0.2% Annual Chance Flood (City of Los Angeles Floodplain Management Plan, 2015).

As detailed in Section 4.9 of this document, impervious surfaces cover approximately 49 percent of the existing project site and with the project, the total area of impervious surfaces would be increased to 68 percent, which is a 19 percent increase of the total area in impervious surfaces.

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. This will not be analyzed further in the EIR/EIS that will be prepared for the project.

d) Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Less than Significant Impact

The City's LADWP manages the water supply for Los Angeles. LADWP's goal is to ensure that the City's water quality and demand are met by available water supplies. The primary sources of water supply for the City of Los Angeles are the Los Angeles Aqueducts, local groundwater, recycled water and supplemental water purchased from the MWD of Southern California. Water from the MWD is delivered through the Colorado River Aqueduct and the State Water Project's California Aqueduct. LADWP is a member agency that relies on imported water from MWD. For the five fiscal years ending June 30, 2015, L.A.'s water purchases from MWD averaged 280 mgd (approximately 314,000 acre-feet per year), which constituted approximately 57 percent of the LADWP's total water supply (Los Angeles Department of Water & Power 2013a). The quantities of water obtained from these sources vary from year to year and are dependent on weather conditions and water demand.

Sustainable sources of water, such as recycled water, are being utilized to help meet future water demands. The City of Los Angeles treats over 400,000 acre-feet per year (AFY) of wastewater, most of which is discharged into the ocean. The City aims to produce up to 59,000 AFY of recycled water by 2035 for non-potable reuse and groundwater replenishment (LADWP, 2013b). The LADWP, in partnership with the LASAN, is proposing undertaking the Los Angeles Groundwater Replenishment (GWR) Project. The GWR Project will provide up to 30,000 AFY – more than 9.7 billion gallons – of purified water by 2023 to replenish the San Fernando Groundwater Basin (LADWP, n.d.).

The project site is developed with a public housing complex containing 100 multi-family units. **Table 4.18-2** displays the estimated increase in potable water demand as a result of the project. As shown in the table below, the project would have an estimated water demand of 31,133 gallons per day (gpd) and would result in an estimated increase in water demand of 14,833 gpd.

Table 4.18-2
ESTIMATED PROJECT NET WATER DEMAND

Unit type	Consumption Rate Gallons Per Day (gpd)[1]	Number of Units	Water Demand (gpd)
Proposed Multifamily Units	163	191	31,133
Existing Multifamily Units	163	100	16,300
		ESTIMATED INCREASE IN WATER DEMAND	14,833

1 Source: Los Angeles Department of Water & Power Urban Water Management Plan, 2015. Exhibit 2O, page 2-14, Water Demand Forecast for Low-Income Residential Customers Fiscal Year Ending June 30. Accessed online on February 12, 2018, at: https://www.ladwp.com/cs/idcplg?IdcService=GET_FILE&dDocName=QOELLADWP005416&RevisionSelectionMethod=LatestReleased.
The highest (i.e. worst case) water demand of 163 gpd is used for analysis.

LADWP updates its Urban Water Management Plan (UWMP) every five years to account for changing conditions. This Plan projects water supply and distribution needs based on anticipated growth in population, housing, and employment and identifies water supply strategies to meet this demand (Los Angeles Department of Water & Power, 2015. p. M.1-2). The most recent UWMP was prepared in 2015 and is based on a 25-year planning horizon through 2040.

The project would be constructed in two phases to develop the proposed 191-units. Opening years for the two phases are estimated to be: 2022 for Phase I and 2025 for Phase II. 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 net increase in water demand of 14,833 gpd (16.62 AFY) is approximately .008 percent[5] of the UWMP's projected demand for multi-family housing at project buildout (2025). Therefore, the project would comprise a de minimis demand compared to the anticipated demand from multifamily housing. As such, 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 UWMP found that with its current water supplies, planned future water supplies and water conservation, LADWP will be able to reliably provide water to its customers through 2040. Sufficient water supplies are available to meet demand within the City's service area through all hydrologic cycles during the term of the latest UWMP (Los Angeles Department of Water & Power UWMP, 2015, p. ES-20). 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 includes the development of water lines to provide an adequate water flow to the project site for water service and fire suppression needs. The project would comply with applicable

5 The project's net increase in water demand of 14,833 gallons per day equates to approximately 16.62 acre-feet per year. 16.62 acre-feet per year from the project, divided by 206,065 acre-feet per year (projected water demand for multi-family housing at project build out (2025), equates to approximately .008 percent.

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. This will not be analyzed further in the EIR/EIS that will be prepared for the project.

e) Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less than Significant Impact

The project includes the development of sewer lines to provide an adequate wastewater flow from the project site. The project would comply with applicable requirements of the City of Los Angeles Department of Public Works such that the project would provide adequate infrastructure for wastewater flows from the project site. As described in Section 4.18.b), the volume of wastewater generated by the project represents only a fraction (approximately .0040 percent) of the existing daily capacity of the wastewater treatment facility providing service in the area. Therefore, the project would be within the existing capacity of the wastewater treatment provider and no impacts would occur. This will not be analyzed further in the EIR/EIS that will be prepared for the project.

f) Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less than Significant Impact

Los Angeles Bureau of Sanitation (LASAN) is responsible for the collection and removal of all solid materials and waste in the City of Los Angeles. The City collects an average of 6,652 tons per day of refuse, recyclables, yard trimmings, horse manure and bulky items from more than 750,000 homes. LASAN has over 500 collection vehicles. Per the City of Los Angeles LA Sanitation website, trash service is currently provided to the project site by LA Sanitation on Mondays (LA Sanitation Residential Collection, 2018). The refuse collected by LASAN goes to landfills, the recyclable materials are transferred to centers that can use it to make new products, and the green waste is turned into mulch (City of Los Angeles, Sanitation, 2018).

There are currently over 40 facilities that are operating in and around the City that receive, process, and transport recyclable material and yard trimmings to markets, and solid waste to disposal facilities. These include (City of Los Angeles, 2013, Volume II, p. 41):

- Material Recovery Facilities (MRFs)
- Yard Trimmings and Food Scraps Processing Facilities
- Construction and Demolition Debris Processing Facilities
- Waste-to-Energy Facilities
- Transfer Stations
- Landfills

The total permitted capacity of the landfill facilities used by the City of Los Angeles is approximately 63,400[6] tons per day with annual daily throughput of approximately 41,700 tons per day.[7] Sufficient landfill capacity is available to meet the City demand for years to come (HDR, 2014, p. 4.13-8).

Demolition of the existing Rose Hill Courts, proposed project construction, and project occupancy would generate solid waste requiring disposal at local landfills. When buildings are demolished, large quantities of materials are generated. The entire weight of a building, including the concrete foundations, driveways, patios, etc., may be generated as C&D materials when a building is demolished (EPA, 2003, p. 10).

Materials generated during construction of the project could include paper, cardboard, metal, plastics, glass, concrete, lumber scraps and other materials. Estimated amounts of construction waste from the project are derived from United States Environmental Protection Agency estimated construction and demolition rates. The EPA's report used national statistical data and typical waste generation data from construction, renovation, and demolition sites. Results were used to develop a weighted average estimate of the overall residential construction waste generation rate of 4.39 pounds per square foot (EPA, 2003, p. 9). Table 2-3, Summary of Residential Demolition Job Site Waste Surveys, provides an estimated generation rate of 127 pounds per square foot for multi-family demolition waste (EPA, 2003, p. 13).

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. The City's C and D Waste Recycling Ordinance requires all mixed C and D waste generated within city limits be taken to City certified C and D waste processors. LASAN is responsible for the C and D waste recycling policy (LA Sanitation, 2018c). Additionally, 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. Therefore, the project would have a less than significant impact in this regard.

Table 4.18-3 below shows the estimated amount of waste to be generated from demolition of the existing Rose Hill Courts and construction of the project. As shown in the table below, it is anticipated that demolition and construction for the project would generate approximately 4,567 tons of debris.

Table 4.18-3
ESTIMATED CONSTRUCTION-RELATED SOLID WASTE GENERATION

Activity	Generation Rate	Square Feet	Waste (tons)
Demolition of Rose Hill Courts	127 pounds per square foot	67,840 square feet[4]	4,308
Construction of Rose Hill Courts Redevelopment Project	4.39 pounds per square foot[3]	118,000 square feet[5]	259
TOTAL ESTIMATED CONSTRUCTION SOLID WASTE GENERATION			**4,567**

6 Numbers from HDR Report, minus 13,200 for closed Puente Hills Facility.
7 Numbers from HDR Report, minus 10,200 for closed Puente Hills Facility.

As shown in **Table 4.18-4**, occupancy of the existing 100 apartment units and associated administrative office generates an estimated 2.05 tons of waste annually. This estimate does not account for diversion from landfills. The proposed 191-unit project is estimated to generate a total of 4,567 tons of waste during the construction phase and a total of 6.93 tons of waste per year during project operation.

Table 4.18-4
EXISTING AND PROJECT ESTIMATED SOLID WASTE GENERATION

Land Use	Generation Rate	Number of Units/Employees/ sq ft	Waste (tons/year)
EXISTING SOLID WASTE GENERATION			
Existing Multi-family units	0.006115 tons/household per year[1]	100 units	0.6115
Existing Office	1.44 tons/employee/year[2]	1 employee	1.44
ESTIMATED EXISTING TOTAL SOLID WASTE GENERATION			**2.05**
PROJECT OPERATIONAL SOLID WASTE GENERATION			
Proposed Multi-family units	0.006115 tons/household per year[1]	191 units	1.17
Property Mgmt. & Maintenance Office	1.44 tons/employee/year	4 employees	5.76
ESTIMATED OPERATIONAL TOTAL SOLID WASTE GENERATION			6.93
NET INCREASE IN SOLID WASTE GENERATION WITH THE PROJECT (INCREASE IN SOLID WASTE COMPARED TO EXISTING CONDITIONS)			4.88

Source: UltraSystems, 2018
1 This rate is based upon CalRecycle's Estimated Solid Waste Generation Rate of 12.23 pounds/household/year, which has been converted to tons per household per year
2 This rate is based on 2014 Generator-Based Characterization of Commercial Sector Disposal and Diversion in California, Cal Recycle, 2015, accessed online on February 19, 2018 at: http://www.calrecycle.ca.gov/publications/Documents/1543/20151543.pdf
3 This rate is based on United States Environmental Protection Agency estimated construction and demolition rates (EPA, 2003, p. 9)
4 This is based on the City of Los Angeles ZIMAS parcel profile report for the project site.
5 This square footage information was provided by the project applicant via email on June 8, 2018.

The project would increase the number of housing units and population at the project site. As depicted in the table above, the project would result in a net increase of 4.88 tons per year of solid waste generated, compared to the existing uses at the project site. This equates to an estimated increase of approximately 0.013 tons per day of waste, compared to existing conditions (4.88 tons per 365 days). As discussed above, the total permitted capacity of the landfill facilities used by the City of Los Angeles is approximately 63,400 tons per day with annual daily throughput of approximately 41,700 tons per day. Therefore, the project's construction waste would represent a fraction of the City's landfill capacity. The project's estimated increase of 0.013 tons of waste per day represents a minuscule percentage of the City's daily capacity (0.00000031 percent) Since sufficient permitted landfill capacity exists to support occupancy of the project, no adverse impact to 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. This will not be analyzed further in the EIR/EIS that will be prepared for the project.

g) Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Less than Significant Impact

In 1989, the California Legislature enacted the California Integrated Waste Management Act (AB 939), in an effort to address solid waste problems and capacities in a comprehensive manner. The law required each city and county to divert 50 percent of its waste from landfills by the year 2000. The law further required every city and county to prepare a Source Reduction and Recycling Element. Requirements established by AB 939 are implemented through the City of Los Angeles Solid Waste Integrated Resources Plan (SWIRP) or commonly known as the City's Zero Waste Plan (City of Los Angeles, 2013).

The SWIRP is a long-term master plan (through year 2030) for the City's solid waste programs, policies and environmental infrastructure. The blueprint for SWIRP is RENEW L.A. More specifically, RENEW L.A. establishes the vision for Zero Waste. SWIRP proposes an approach for the City to achieve a goal of 75 percent diversion by 2013, and 90 percent diversion by 2025. The City reached 76.4 percent diversion in 2011. These targeted diversion rates would be implemented through an enhancement of existing policies and programs, implementation of new policies and programs, making certain programs mandatory, and the development of future facilities to meet the City's recycling and solid waste infrastructure needs through 2030 (HDR, 2014, p. 2-1).

In 2010 an estimated 2.6 million tons of recyclables were collected from residents and businesses within the City of Los Angeles. In 2010 LASAN collection crews collected approximately 209,535 tons of recyclables (excluding contamination) from residential curbside customers using the curbside blue bins and approximately 130,000 tons were self-hauled by residents. The City's multi-family collection contractors recycled 14,366 tons in 2010. Approximately 2,260,000 tons of recyclables were transported from commercial sources to MRFs and/or markets by commercial haulers and through commercial self-haul (City of Los Angeles, 2013, Volume II p. 41).

A Progress Report conducted in 2013 by the UCLA Engineering Extension's Municipal Solid Waste Management Program found that the City of Los Angeles has achieved a recycling rate of 76.4 percent, which exceeds state mandate of 50 percent (HDR, 2014, p. ES-8). Compliance with the plans and policies outlined in the 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. This will not be analyzed further in the EIR/EIS that will be prepared for the project.

4.19 Mandatory Findings of Significance

Does the project have:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) The potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	**X**			
b) Impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	**X**			
c) Environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	**X**			

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Potentially Significant Impact

The project site is located in a highly-urbanized setting and provides low habitat value for special-status plant and wildlife species. No special-status plants or wildlife[8] were observed within the project site. Thus, no direct or indirect impacts on special-status plants or wildlife species are anticipated.

8 Special status species include candidate and sensitive species.

However, the project site contains ornamental vegetation and building structures that could potentially provide cover and nesting habitat for bird species that have adapted to urban areas, such as rock pigeons and mourning doves. Native bird species such as the mourning doves are protected by the MBTA and the California Fish and Game Code, which render it unlawful to take native breeding birds, their nests, eggs, and young. Indirect impacts on breeding 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. Therefore, the project has the potential to impact migratory non-game breeding birds, and their nests, young and eggs. This issue will be analyzed in the EIR/EIS to be prepared for the project.

Additionally, the project would demolish the existing Rose Hill Courts development. Rose Hill Courts was found to be eligible for listing in the National Register of Historic Places at the local level of significance under Criteria A and Criteria C –for its association with the development of public and defense housing during World War II, and its architectural significance as a public housing complex following the planning and design principals of the Garden City and Modern movements. Because it was determined eligible for the National Register, it is automatically included in the California Register of Historical Resources as well. This is a potentially significant impact to a historical resource. This will be analyzed in the EIR/EIS to be prepared for the project.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Potentially Significant Impact

For each of the environmental topics determined to be potentially significant in this IS, the potential for cumulative impacts will be analyzed in the EIR/EIS to be prepared for the project. The topics found to be potentially significant and that warrant analysis in the EIR/EIS include: **Section 4.1** (Aesthetics) indicates that the project could have a potentially significant impact regarding visual character or quality of the site. **Section 4.3** (Air Quality) indicates that the project could have a potentially significant impact regarding construction and operational air quality emissions. **Section 4.4** (Biological Resources) indicates that the project could have a potentially significant impacts to migratory bird species. **Section 4.5** (Cultural Resources) indicates that the project could have a potentially significant impact regarding historical resources. **Section 4.6** (Geology and Soils) indicates that the project could have a potentially significant impact regarding soil erosion, unstable soils, and expansive soils. **Section 4.7** (Greenhouse Gas Emissions) indicates the project could have a potentially significant impact regarding the project's emission of greenhouse gases. **Section 4.8** (Hazards and Hazardous Materials) indicates the project could have a potentially significant impact regarding ACMs, LBP, lead in soils, lead in water, and radon gas. **Section 4.10** (Land Use and Planning) indicates the project could have a potentially significant impact regarding conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project. **Section 4.12** (Noise) indicates the project could have a potentially significant impact regarding short-term and long-term noise generation. **Section 4.13** (Population and Housing) indicates the project could have a potentially significant impact regarding temporary relocation of a portion of the existing onsite residents. **Section 4.14** (Public Services) indicates the project could have a potentially significant impact regarding fire and police services, parks, and libraries. **Section 4.15** (Recreation) indicates the project could have potentially significant impacts to recreational facilities. **Section 4.16** (Traffic and Transportation) indicates that the project could have a potentially significant impact to

traffic. **Section 4.17** (Tribal Cultural Resources) indicates that construction of the project could have a potentially significant impact to Tribal Cultural Resources. The project's potential to have cumulative impacts regarding these environmental topics will be further analyzed in the EIR/EIS to be prepared for the project.

Energy Efficiency

PRC section 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." Section 15126.4(a)(1)(C) of the CEQA Guidelines provides that: "energy conservation measures, as well as other appropriate mitigation measures, shall be discussed when relevant." Appendix F of the CEQA Guidelines provides a list of possible energy impacts and potential conservation measures that are intended to assist the lead agency in preparation of an EIR (Perkins Coie, 2018). The analysis in the EIR/EIS to be prepared for the project is required under CEQA Appendix F to calculate the project's energy use attributable to project-generated vehicle trips, and to also calculate the project's energy consumption during construction and operational phases.

Socioeconomics and Environmental Justice

The NEPA of 1969 requires that the potential social, economic, and environmental effects of federal actions be considered. Consideration of potential social and economic impacts, particularly those effects on communities protected under nondiscrimination statutes, is a critical component of NEPA analyses (VDOT, 2016, p.1). Federal agencies must consider environmental justice in their activities under NEPA. Executive Order 12898 directs each Federal Agency to "make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations," including tribal populations. The Executive Order directs Federal agencies to analyze the environmental effects, including human health, economic, and social effects, of their proposed actions on minority and low-income communities when required by NEPA. The Memorandum calls for agencies to address significant adverse environmental effects on these communities in mitigation measures outlined or analyzed in Environmental Impact Statements, Environmental Assessments, Findings of no significant impact, and Record of decision (EPA, 2018). The EIS/EIR to be prepared for the project will analyze the topics of socioeconomics and environmental justice in compliance with NEPA.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Potentially Significant Impact

As detailed in threshold b) above, the project could have potentially significant impacts to the following issue areas: aesthetics, air quality, biological resources, cultural resources, geology and soils, hazards and hazardous materials, greenhouse gas emissions, land use and planning, noise, population and housing, public services, recreation, traffic and transportation, and tribal cultural resources. Therefore, the project could also contribute to cumulative impacts for these issue areas. This will be analyzed in the EIR/EIS to be prepared for the project.

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