ROSE HILL COURTS PROJECT
CEQA FINDINGS OF FACT

The California Environmental Quality Act (Pub. Resources Code, § 21000 *et seq*.) ("CEQA") requires that public agencies shall not approve or carry out a project for which an environmental impact report ("EIR") has been certified that identifies one or more significant adverse environmental effects of a project unless the public agency makes one or more written Findings for each of those significant effects, accompanied by a brief explanation of the rationale for each Finding (State CEQA Guidelines [Cal. Code Regs., tit. 14, § 15000 *et seq*.], § 15091). This document presents the CEQA Findings of Fact made by the Housing Authority of the City of Los Angeles ("Authority" or "HACLA"), in its capacity as the CEQA lead agency, regarding the Rose Hill Courts Redevelopment Project ("Project"), evaluated in the Draft Environmental Impact Report ("EIR") and Final EIR for the project.

SECTION I
INTRODUCTION

Public Resources Code section 21002 states that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects[.]" Section 21002 further states that the procedures required by CEQA "are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects."

Pursuant to section 21081 of the Public Resources Code, a public agency may only approve or carry out a project for which an EIR has been completed that identifies any significant environmental effects if the agency makes one or more of the following written finding(s) for each of those significant effects accompanied by a brief explanation of the rationale for each finding:

1. Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment.

2. Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.

3. Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

As indicated above, section 21002 requires an agency to "avoid or substantially lessen" significant adverse environmental impacts. Thus, mitigation measures that "substantially lessen" significant environmental impacts, even if not completely avoided, satisfy section 21002's mandate. (*Laurel Hills Homeowners Assn. v. City Council* (1978) 83 Cal.App.3d 515, 521 ["CEQA does not mandate the choice of the environmentally best feasible project if through the imposition of feasible mitigation measures alone the appropriate public agency has reduced environmental damage from a project to an acceptable level"]; *Las Virgenes Homeowners Fed., Inc. v. County of Los Angeles* (1986) 177 Cal. App. 3d 300, 309 ["[t]here is no requirement that adverse impacts of a project be avoided completely or reduced to a level of insignificance . . . if

such would render the project unfeasible"].)

While CEQA requires that lead agencies adopt feasible mitigation measures or alternatives to substantially lessen or avoid significant environmental impacts, an agency need not adopt infeasible mitigation measures or alternatives. (Pub. Resources Code, § 21002.1(c) [if "economic, social, or other conditions make it infeasible to mitigate one or more significant effects on the environment of a project, the project may nonetheless be carried out or approved at the discretion of a public agency"]; see also State CEQA Guidelines, § 15126.6(a) [an "EIR is not required to consider alternatives which are infeasible"].) CEQA defines "feasible" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." (Pub. Resources Code, § 21061.1.) The State CEQA Guidelines add "legal" considerations as another indicia of feasibility. (State CEQA Guidelines, § 15364.) Project objectives also inform the determination of "feasibility." (*Jones v. U.C. Regents* (2010) 183 Cal. App. 4th 818, 828-829.) "'[F]easibility' under CEQA encompasses 'desirability' to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors." (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 401, 417; see also *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 715.) "Broader considerations of policy thus come into play when the decision making body is considering actual feasibility[.]" (*Cal. Native Plant Soc'y v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 1000 ("*Native Plant*"); see also Pub. Resources Code, § 21081(a)(3) ["economic, legal, social, technological, or other considerations" may justify rejecting mitigation and alternatives as infeasible] (emphasis added).)

Environmental impacts that are less than significant do not require the imposition of mitigation measures. (*Leonoff v. Monterey County Board of Supervisors* (1990) 222 Cal.App.3d 1337, 1347.)

The California Supreme Court has stated, "[t]he wisdom of approving . . . any development project, a delicate task which requires a balancing of interests, is necessarily left to the sound discretion of the local officials and their constituents who are responsible for such decisions. The law as we interpret and apply it simply requires that those decisions be informed, and therefore balanced." (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 576.) In addition, perfection in a project or a project's environmental alternatives is not required; rather, the requirement is that sufficient information be produced "to permit a reasonable choice of alternatives so far as environmental aspects are concerned." Outside agencies (including courts) are not to "impose unreasonable extremes or to interject [themselves] within the area of discretion as to the choice of the action to be taken." (*Residents Ad Hoc Stadium Com. v. Board of Trustees* (1979) 89 Cal.App.3d 274, 287.)

SECTION II
FINDINGS REGARDING ENVIRONMENTAL IMPACTS NOT REQUIRING MITIGATION

The Board of Commissioners finds that the following potential environmental impacts of the Project are less than significant and therefore do not require the imposition of Mitigation Measures.

A. AESTHETICS

1. Scenic Vistas

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

Finding: No impact. (Draft EIR, p. 4.1-14.)

Explanation: There are no scenic views or vistas afforded on or through the Project Site and thus development of the proposed Project would not result in impacts to scenic vistas or views. Distant views of hills to the southeast from McKenzie Avenue and Florizel Street would remain. **Therefore, the Project would have no impact with respect to this threshold and no mitigation is required.** (Draft EIR, p. 4.1-14.)

2. Visual Character

Threshold: In nonurbanized areas, would the Project substantially degrade the existing visual character or quality of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality ?

Finding: Less than significant. (EIR, pp. 4.1-16—4.1-17.)

Explanation: The Project Site is located in an urban setting characterized by a mix of single family and multi-family residential buildings, low-scale commercial, recreational, civic/institutional buildings, natural open spaces and park lands. Views of the existing streetscape are characterized by low height (one or two story) buildings, aging infrastructure and scenic views and vistas of nearby and distant hillsides and natural open spaces in the surrounding area. (Draft EIR, p. 4.1-15.)

The Project Site is located in the Northeast Los Angeles Community Plan (Community Plan) area and has a designated land use of low density residential (which corresponds to RE9, RS, R1, RU, RD6, RD5 zones). The Project Site is zoned by the Los Angeles Municipal Code as [Q]R1-1D (One Family Dwelling, Height District 1D). The One Family Zone permits one- and two-family dwellings, parks, playgrounds and community centers. Therefore, the Rose Hill Courts development is an existing "non-conforming" use because the existing development has multi-family housing units which were constructed before the site's zoning was downzoned to R1 in the year 2000. The Project is requesting deviations under the LAMC §14.00B including a density bonus in excess of that permitted in LAMC §12.22 A.25 as well as increasing the maximum height limitation from 30 feet (required by Ordinance 180,403, and the associated "D" Limitation A1.a) to 56 feet and changing the front yard setback from 20 feet (required by the R1 zone) to a range of 14-20 feet. (Draft EIR, p. 4.1-15.)

The Project is also requesting an Affordable Housing Density Bonus as identified in LAMC §12.22 A.25 and filed per LAMC §11.5.7. The request is to allow a Density Bonus project with off-menu incentives. As discussed in Section 2.0, the Project includes a total of seven (a through g)

requested off-menu incentives. Five of those (a through e) would affect aesthetics or scenic quality. These include (Draft EIR, p. 4.1-15.):

a. To Allow an affordable housing project to calculate its buildable area based on the "Buildable Area" definition in LAMC §12.03 rather than the "Floor Area, Residential" and "Base Floor" definitions referenced in Ordinance 180,403, and "Q" Condition 2.d. (1), and LAMC §12.03.

b. To Allow an affordable housing project to deviate from the "step-back" provisions of Ordinance 180,403, and "Q" Condition 2.d. (2). This deviation shall additionally require no limitation on the percentage of exterior walls facing a front lot line.

c. To Allow an affordable housing project to consist of one (1) building type and roof form in lieu of the three (3) or more identified in Ordinance 180,403, and "Q" Condition 2.d. (3).

d. To Allow new hardscape areas to utilize both permeable and impermeable paving systems in lieu of the language requiring projects to utilize only permeable paving systems identified in Ordinance 180,403, and "Q" Condition 2.f. and "Q" Condition 5.e.

e. To Allow the construction of retaining walls that exceed the total quantity and linear footage identified in Ordinance 180,403, and "Q" Condition 3.a.

Based on extensive outreach to the existing residents on the site and in the community, the Project has been designed to provide high quality, multi-family housing, at a scale that is contextual and appropriate for the site and the community. The architectural plan is based on creating a development with multiple building and unit types with shared amenities. Refer to Draft EIR Figures 4.1 3 through 4.1 7, which show the preliminary conceptual renderings for the Project. As shown in these figures, the Project proposes a variety of building materials (including stucco, and composite siding) that would conform to current regulations. (Draft EIR, p. 4.1-16.)

Additionally, the Project proposes buildings that would range from one story in height to four stories, with a maximum height of 56 feet. Buildings A & B would be four story buildings and would be no more than 56 feet above the proposed grade. Buildings C & D would be three story buildings as viewed from the street and would be no more than 46 feet above the proposed grade when viewed from lowest point. Buildings E & F would be three story buildings and would be no more than 40 feet above the proposed grade; and Buildings G and H would be two story buildings and would be no more than 30 feet above the proposed grade. Building I would be a two story building and would be no more than 36 feet above the proposed grade. Building J is the proposed Management Office/Community Building and it would only be a one-story building, no more than 25 feet above the proposed grade. (Draft EIR, p. 4.1-16.)

Consistency with Applicable Plans and Policies

The Project would not conflict with regulations governing scenic quality. The Urban Form and Neighborhood Design Chapter of the Framework Element's intent is to build on each neighborhood's attributes, emphasize livability for existing and future residents, and reinforce the connectivity of the neighborhoods to a citywide structure (City of Los Angeles Department of City Planning, 2018a). The Project's consistency with applicable General Plan and Community Plan Urban Design policies and the City's Walkability Checklist policies is analyzed in Draft EIR Section 4.8. The Project has been designed to be compatible with the existing development in the Project vicinity. The Project would be consistent with goals, objectives and policies contained in existing planning documents that regulate urban design and development in the Project area. The proposed redevelopment would improve the visual quality and aesthetics in addition to the use of the site. (Draft EIR, p. 1-17.)

Compared to existing conditions, there would be fewer buildings on the Project Site, however some of those buildings would be up to three and four stories in height. In addition to the more modern looking four story buildings, the Project also proposes two and three story buildings with a cottage look. The existing over 75 year old structures onsite would be replaced with new buildings. The Project would construct new dwelling units with new building materials and landscaping throughout. The Project has been designed to provide up to 185 dwelling units onsite and the new development would provide better quality housing conditions within a well-designed and attractively landscaped housing complex compared to the existing over 75 year old Rose Hill Courts housing development currently located on the Project Site. **Therefore, the Project would not conflict with applicable zoning and other regulations governing scenic quality and impacts would be less than significant regarding this threshold.** (Draft EIR, p. 4.1-17.)

3. Light and Glare

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

Finding: Less than significant. (Draft EIR, pp. 4.1-17—4.1-18.)

Explanation: ***Shade and Shadows***

For the purposes of analyzing shade/shadow impacts, a significant impact would occur when shadow-sensitive uses (such as residential structures, schools, churches, parks, etc.) would be shaded by a proposed Project building. As depicted in Figure 4.1 2 of the Draft EIR, shadows produced by the Project would not impact adjacent land uses because the furthest extent of shadows offsite (on December 21st at 3:00 PM) would not fall on any buildings located east of the Project Site. Shadows would fall onto the sidewalk located on the eastern side of McKenzie Avenue and would not impact the building located at the southeast corner of McKenzie

Avenue and Browne Avenue. **Therefore, the Project would have a less than significant impact regarding generation of shade and shadow on adjacent land uses and structures.** (Draft EIR, p. 4.1-17.)

Light and Glare

Artificial lighting is currently utilized onsite and in the surrounding area for security, parking, signage, architectural highlighting, and landscaping/decorative purposes. The lights currently on the Project Site are not energy efficient and comprised of older lighting. The Project proposes new lighting that is energy efficient and that would shield light from spilling offsite. Glare could be produced from glass windows, and from parked cars, however the Project would not result in significant glare impacts because it does not propose highly reflective building materials with respect to Threshold (d). Furthermore, the Project would be required to comply with the City of Los Angeles Municipal Code lighting requirements (Chapter 1 [Article 2, § 12.21 A,5(k), Article 7, § 17.08 C, and Article 4.4, § 14.4.4(E)] and Chapter 9, Article 3, § 93.0117(b)). **Therefore, the Project would have a less than significant impact related to lighting and glare.** (Draft EIR, pp. 4.1-17—4.1-18.)

B. AGRICULTURE AND FOREST RESOURCES

1. Farmland Conversion

Threshold: Would the Project convert Primate Farmland, Unique Farmland, or Farmland of Statewide significance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

Finding: No impact. (IS, p. 4.2-1.)

Explanation: The California Department of Conservation (DOC) established the Farmland Mapping and Monitoring Program (FMMP) 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. (IS, p. 4.2-1.)

Therefore, no farmland would be converted to non-agricultural use and no impacts would occur.(IS, p. 4.2-1.)

2. Agricultural Zoning

Threshold: Would the Project conflict with existing zoning for agricultural use, or a Williamson Act contract?

Finding: No impact. (IS, p. 4.2-2.)

Explanation: 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). (Draft EIR, p. 4.2-2.)

3. Forestland Zoning

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

Finding: No impact. (IS, p. 4.2-2.)

Explanation: 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**. (IS, p. 4.2-2.)

4. Loss of Forest Land

Threshold: Would the Project result in the loss of forest land or conversion of forest land to non-forest use?

Finding: No impact. (IS, p. 4.2-2.)

Explanation: 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**. (IS, p. 4.2-2.)

5. Conversion of Farmland or Forestland

Threshold: 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?

Finding: No impact. (IS, p. 4.2-3.)

Explanation: 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.** (IS, p. 4.2-3.)

C. AIR QUALITY

1. Air Quality Plans

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

Finding: Less than significant. (Draft EIR, pp. 4.2-24-4.2-25.)

Explanation: The SCAQMD's 2016 AQMP is based upon population, employment and housing projections in SCAG's 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (SCAG, 2016). The RTP/SCS is in turn based upon local plans and policies, including the City of Los Angeles General Plan. According to an analysis of data in the RTP/SCS, the forecasted population of the City of Los Angeles subregion in the baseline year of 2018 and the first fully operational year of 2024 will be 4,009,193 and 4,172,886, respectively. The growth in population thus would be 163,693 persons. The population of the Project is expected to grow from 221 residents at the end of 2018 to 656 at full occupancy, an increase of 435. For purposes of highly conservative analysis, it is assumed that all the new residents are from outside the City of Los Angeles subregion. The Project's growth represents 0.265% of the population growth forecast for the subregion. (Draft EIR, p. 4.2-24—4.2-25.)

The Project would be consistent with the growth projections in both the AQMP and the 2016-2040 RTP/SCS. This means that these two documents took into account developments such as the Project in their modeling and analyses and the 2016-2040 RTP/SCS vehicle trip and VMT reduction goals and policies. Since these growth assumptions are built into the 2016 AQMP demonstration of attainment with NAAQS and CAAQS, it is also expected that the Project would not delay the attainment of those standards. (Draft EIR, p.4.2-25.)

Additionally, to assist the implementation of the AQMP, projects must not create regionally significant emissions of regulated pollutants from either short term construction or long term operations. As demonstrated under Threshold (b) below, neither short-term (construction) nor long-term (operational) emissions would exceed the significance thresholds established by the SCAQMD. (Draft EIR, p. 4.2-25.)

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

2. Criteria Pollutants

Threshold: 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?

Finding: Less than significant. (Draft EIR, pp. 4.2-25—4.2-27.)

Explanation: ***Short-Term Construction***

The Project will be built in two phases. During Phase I, 20 units and a community center would be demolished and during Phase II, 80 units would be demolished. Phase I construction activity will consist of construction of 89 units and a surface parking area. Phase II will consist of construction of 96 units along with a community building, surface level parking areas, and tuck under parking. Phase I construction activity is expected to begin in March 2021 and take approximately 18 months to complete and Phase II is expected to begin in December 2022 and take approximately 19 months to complete. The Project is proposed to be fully operational in 2024. (Draft EIR, p. 4.2-25.)

Since the existing site will probably have construction material that contains asbestos, the resulting construction debris would have to be disposed of at a landfill that can accept asbestos. The nearest acceptable landfill would be Waste Management Inc.'s Azusa Land Reclamation site at 1211 W. Gladstone in Azusa, (Waste Management, 2018) approximately 23 miles from the Project Site. (Draft EIR, p. 4.2-25.) In addition, it is estimated that about 2,300 cubic yards of lead-contaminated soil will need to be removed from the site. (See Section 4.7.5 of Draft EIR.) The excavated soil will also be transported to the aforementioned Azusa site. (Final EIR, p. III-2.)

As shown in Table 4.2 9 of the Final EIR, all construction emissions associated with the Project would be below the regional significance thresholds. Furthermore, project design feature **AQ-PDF-1** would require only permitted use of construction equipment approved by the South Coast Air Quality Management District or the California Air Resources Board's Portable Equipment Registration Program for contaminated soil removal and transport, and for project demolition and construction.

Therefore, impacts related to air quality during project construction would be less than significant. (Final EIR, p.III-2.)

AQ-PDF-1: The construction contractor may only use equipment permitted (where permits are required) by the South Coast Air Quality Management District or registered (where registration is required) under the California Air Resources Board's Portable Equipment Registration Program when used for contaminated soil removal and transport, and for project demolition and construction.

Long Term Operational Emissions

The primary source of operational emissions would be vehicle exhaust emissions generated from project induced vehicle trips, known as "mobile source emissions." Other emissions, identified as "energy source emissions," would be generated from energy consumption for water, space heating, and cooking equipment while "area source emissions" would be generated from structural maintenance and landscaping activities, and use of consumer products. No hearths or fireplaces will be included in the Project. (Draft EIR, p. 4.2-26.)

Since the existing site is currently producing operational emissions that would be eliminated prior to constructing the proposed Project, the environmental effect of the project would be the net emissions difference. Operational emissions from the existing configuration of buildings and the built out configuration of the proposed Project were estimated using the operational module of CalEEMod. Default values generated by CalEEMod, including trip rate, expected vehicle fleet mix, and vehicle traveling speed and distance assumptions, were used in each model run. The model predicted area source, energy source, and mobile source emissions for net effect of the proposed Project are presented in Table 4.2 10 of the Draft EIR. (Draft EIR, p. 4.2-26.)

As seen in Table 4.2 10 of the Draft EIR, for each criteria pollutant, net operational emissions would be below the pollutant's SCAQMD significance threshold. In addition, ROG and NOx emissions would decrease from existing levels. Therefore, operational criteria pollutant emissions would be less than significant. (Draft EIR, p. 4.2-26.)

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

Project would be less than significant and therefore would not contribute to a cumulative impact. (Draft EIR, p.4.2-27.)

3. Sensitive Receptors

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

Finding: Less than significant. (Draft EIR, pp. 4.2-27—4.2-29.)

Explanation: Following SCAQMD LST Guidance (Chico and Koizumi, 2008), only onsite construction emissions were considered in the localized significance analysis. It was estimated that the largest area of construction activity on a single day would be two acres. As seen in Table 4.2-4 of the Draft EIR, the nearest sensitive receptor to the Project is about 78 feet (24 meters) away. The SCAQMD LST Guidance recommends using 25 meters for cases in which the distance is less than that value. The activity with the largest emissions of NOx and CO would be demolition during Phase I. The activity with the largest emissions of PM10 and PM2.5 would be grading during Phase I. LSTs were obtained from tables in Appendix C of the SCAQMD's LST Guidance. Table 4.2 11 of the Draft EIR shows the results of the localized significance analysis for the proposed Project. Emissions of no criteria pollutant would exceed its threshold for significance. **Therefore, localized air pollution impacts from construction activity would be less than significant**. (Draft EIR, pp. 4.2-27—4.2-28.)

Although sensitive receptors would be exposed to diesel exhaust from construction equipment, which has been associated with lung cancer (OEHHA, 1998), the duration of exposure would not be sufficient to result in a significant cancer risk. Carcinogenic health risk assessments are based upon an assumption of 30 years continuous residential exposure, while the exposure in the present case would be for about 6,488 hours during construction. Additionally, the SCAQMD CEQA guidance does not require a health risk assessment for short-term construction emissions. Therefore, no cancer health risk assessment was necessary. Acute non cancer risk assessments are based upon one hour maximum exposures, but acute RELs for diesel exhaust and DPM have not been established by the OEHHA (OEHHA, 2016).(Draft EIR, p. 4.2-28.)

The localized significance analysis that was done here for construction is not normally done for the operational phase of projects of this type. The reason, as explained by the SCAQMD (Krause and Smith, 2006), is that by far the highest emissions from operations are from onroad motor vehicles, which travel over a large geographical area. "Local" receptors are highly dispersed, so that each one receives a tiny fraction of the emissions. Meanwhile, emissions from onsite sources are minor. (Draft EIR, p. 4.2-28.)

Asbestos

Many buildings constructed before the late 1990s contain asbestos. Asbestos was widely used in the construction industry in thousands of materials. Some asbestos containing materials (ACM) are judged to be more dangerous than others due to the species of asbestos, amount of ACM and the material's friable nature. Sprayed coatings, pipe insulation, and asbestos insulating board are thought to be the most dangerous due to their high content of amphibole asbestos and friable nature. Since the existing buildings were built in 1942, asbestos will be expected and must be abated to comply with SCAQMD Rule 1403. To comply with this Rule, the contractor is required to have an asbestos survey performed by a Cal/OSHA Certified Asbestos Consultant (CA Department of Industrial Relations, 2018) and to submit an asbestos notification form with a fee to the SCAQMD at least 10 working days prior to any demolition activity. **Compliance will result in a less than significant effect from exposure to asbestos**. (Draft EIR, pp. 4.2-28—4.2-29.)

CO Hotspots

As discussed in Section 4.2.3.1 of the Draft EIR, if a project intersection does not exceed 400,000 vehicles per day, then the project does not need to prepare a detailed CO hotspots analysis. (Draft EIR, p. 4.2-29.)

At buildout of the Project, the highest number of average daily trips at an intersection under the "Future Post Project (With Project) Conditions" would be approximately 15,510 at the Monterey Road and Huntington Drive intersection (KOA, 2019), which is significantly below the daily traffic volumes that would be expected to generate CO exceedances as evaluated in the 2003 AQMP. This daily trip estimate is based on the peak hour conditions of the intersection. There is no reason unique to the Air Basin meteorology to conclude that the CO concentrations at the Monterey Road and Huntington Drive intersection would exceed the 1 hour CO standard if modeled in detail, based on the studies undertaken for the 2003 AQMP. Therefore, the Project does not trigger the need for a detailed CO hotspots model and would not cause any new or exacerbate any existing CO hotspots. **As a result, impacts related to localized mobile-source CO emissions are considered less than significant.** (Draft EIR, p. 4.2-29.)

4. Odors

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

Finding: Less than significant. (Draft EIR, p. 4.2-29.)

Explanation: The CEQA guidelines indicate that a significant impact would occur if the proposed project would create objectionable odors affecting a substantial number of people. Construction activities for the proposed project would generate airborne odors and dust associated with the operation of construction vehicles (i.e., diesel exhaust), asphalt patching operations, and the application of paints and coatings. These emissions would occur

during daytime hours only and would be isolated to the immediate vicinity of the construction site and activity. Therefore, they would not affect a substantial number of people. When Project construction is completed, odors from the proposed uses of the proposed project would generally be regarded as similar to those of the existing housing. development; there would be no change. **Therefore, the impact of odors would be less than significant.** (Draft EIR, p. 4.2-29.)

D. BIOLOGICAL RESOURCES

1. Wetlands

Threshold: Would the Project have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Finding: No impact. (Draft EIR, p. 4.3-15.)

Explanation: No wetlands occur in or adjacent to the Project Site. For this reason, no direct or indirect impacts to federally protected wetlands as defined by § 404 of the Clean Water Act (CWA) are anticipated through direct removal, filling, hydrological interruption, or other means, as a result of Project activities, and therefore, no impacts would result. The Project would have no impact **with respect to this threshold. Therefore, no impact would occur and no further analysis is required**. (Draft EIR, p. 4.3-15.)

2. Riparian Habitat

Threshold: Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Finding: No impact. (Draft EIR, p. 4.3-15.)

Explanation: The dominant land use in the Project vicinity is developed and urban park which includes structures, paving, and other impervious surfaces and or areas where landscaping has been installed and maintained. Both the literature review and results of the reconnaissance-level field survey, conducted in May 2018, indicate that riparian habitat or other sensitive natural communities do not exist on or adjacent to the Project Site. For this reason, no direct or indirect impacts to riparian habitat or other sensitive natural communities are anticipated as a result of the Project, and as such, the Project would have no impact with respect to this threshold. **Therefore, no impact would occur and no further analysis is required**. (Draft EIR, p. 4.3-15.)

3. Protected Wetlands

Threshold: Would the Project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool,

coastal, etc.) through a direct removal, filling, hydrological interruption, or other means?

Finding: No impact. (Draft EIR, p. 4.3-15.)

Explanation: No wetlands occur in or adjacent to the Project Site. For this reason, no direct or indirect impacts to federally protected wetlands as defined by § 404 of the Clean Water Act (CWA) are anticipated through direct removal, filling, hydrological interruption, or other means, as a result of Project activities, and therefore, no impacts would result. The Project would have no impact with respect to this threshold. **Therefore, no impact would occur and no further analysis is required.** (Draft EIR, p. 4.3-15.)

4. Wildlife Movement

Threshold: Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Finding: No impact. (Draft EIR, p. 4.3-15.)

Explanation: The Project Site and surrounding areas do not support resident or migratory fish species or wildlife nursery sites. No established resident or migratory wildlife corridors occur on the Project Site or in the surrounding areas. As a result, the Project would not interfere substantially with or impede: (1) the movement of any resident or migratory fish or wildlife species, (2) established resident or migratory wildlife corridors, or 3) the use of wildlife nursery sites. Therefore, there would be no impacts **with respect to this threshold. Therefore, no impact would occur and no further analysis is required**. (Draft EIR, p. 4.3-15.)

5. Local Policies and Ordinances

Threshold: Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Finding: No impact. (Draft EIR, pp. 4.3-15—4.3-16.)

Explanation: The Project Site is located in a developed area, and there were not any native trees or shrubs protected by local policies or ordinances observed on the Project Site during the reconnaissance-level field survey. The Project would not conflict with local policies or ordinances protecting biological resources and therefore would not result in any impacts. There are no protected trees onsite. There would be no impact **with respect to this threshold. Therefore, no impact would occur and no further analysis is required**. (Draft EIR, pp. 4.3-15—4.3-16.)

6. Habitat Conservation Plans

Threshold: Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Finding: No impact. (Draft EIR, p. 4.3-16.)

Explanation: The Project Site is not located in a Habitat Conservation Plan (HCP), Natural Communities Conservation Plan (NCCP), or another approved HCP area. For this reason, the Project would not conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state HCP and therefore, no impacts would result. The Project would have no impact **with respect to this threshold. Therefore, no impact would occur and no further analysis is required**. (Draft EIR, p. 4.3-16.)

E. CULTURAL RESOURCES

1. Archaeological Resources

Threshold: Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Finding: Less than significant. (Draft EIR, pp. 4.4-31—4.4-32.)

Explanation: No prehistoric or historic archaeological resources were observed during the pedestrian field survey. The previous cultural resources surveys within the half mile buffer zone resulted in no archaeological sites or isolates being recorded. A single historic property, a bridge, was identified within the half mile buffer zone, but it is not within the APE. The field survey conducted for this project observed no prehistoric or historic artifacts or features. (Draft EIR, p. 4.4-31.)

As per the discussion with the Gabrielino Band of Mission Indians – Kizh Nation and the Gabrieleno/Tongva San Gabriel Band of Mission Indians during the tribal outreach in 2017, both recommended archaeological and tribal monitoring take place during ground disturbance construction activity associated with the project undertaking. The Gabrieleno Kizh Nation and the San Gabriel Band believe that the project lies in a sensitive area regarded as the ancestral and traditional territories of both entities. The cultural resource study findings conclude that there is only a low potential for finding resources. At a minimum, however, if prehistoric and/or historic items are observed during subsurface activities, it is recommended that work be stopped in that area and a qualified archaeologist should be called to assess the findings and retrieve the material. At this point monitoring by a qualified archaeologist and a tribal representative may be called for. The qualified archaeologist may recommend further investigations if warranted. Further protocols are provided for by the Condition of Approval in Draft EIR, Section 4.13 - Tribal Cultural Resources. (Draft EIR, p. 4.4-31.)

The Project Site has undergone multiple phases of development since the early 20th century onward. This development began in the early 1920s

with construction of the current roads and a number of individual residences throughout what is now the Rose Hill Courts site. This was followed by removal of all the residences in the center in the early 1940s and the construction of Rose Hill Courts itself. The Rose Hill Courts structures had no basements or privies that would leave historic-period deposits. The fully built environment of the Project Site, the elevation of the Project Site relative to adjacent roads suggesting that ground here has been significantly cut and filled, and the high degree of disturbance associated with the construction of the buildings currently present within the Project Site, any subsurface archaeological features have likely been destroyed. The potential for subsurface cultural and or historical deposits is minimal based on the above findings. **Therefore, impacts to archaeological resources would be less than significant.** (Draft EIR, pp. 4.4-31-4.4.-32.)

Nonetheless, in an effort to take into account the effect of the Project on potential archaeological resources, the Project will be subject to a condition of approval as an additional means of protection for the inadvertent discovery of an archaeological resource:

The City of Los Angeles, through HCID, published a Notice of Intent to prepare a combined Environmental Impact Statement ("EIS") in accordance with the National Environmental Policy Act ("NEPA") and EIR in accordance with CEQA for the Project. The proposed action is subject to compliance with NEPA because HACLA is proposing a HUD Section 18 demolition/disposition and the developer, Related Companies of California ("Related"), is planning to use Project-based Section 8 vouchers. The Project involves funding from HUD that qualifies as an ''undertaking'' subject to the Programmatic Agreement among the City of Los Angeles, the California State Historic Preservation Officer (SHPO), and the Advisory Council on Historic Preservation (ACHP) regarding Historic Properties affected by use of Community Development Block Grants; McKinney Act Homeless Programs including the Emergency Shelter Grants Program, Transitional Housing, Permanent Housing for the Homeless Handicapped, and Supplemental Assistance for Facilities to Assist the Homeless; Home Investment Partnership Funds, and the Shelter Plus Care Program for compliance with 36 CFR part 800, the regulations implementing Section 106 of the NHPA. HCID initiated the Section 106 consultation process with SHPO through the Project Programmatic Agreement ("PA"). (Draft EIR, p. 4.4-28.)

SHPO has approved the Project PA with the two project sponsors, HACLA and Related, as Concurring Parties, to implement stipulations to take into account the effect of the Project on potential historic properties, and outlining actions to be taken if historical or cultural deposits are discovered during project construction. These stipulations are described further in Section IV.A.1. (Scenic Resources – Historic Buildings) and Section IV.B.1. (Historical Resources) below.

Condition of Approval – Archaeological Resource Inadvertent Discovery (CUL-COA-1)

In the event that archaeological remains are discovered during the course of Project construction, Stipulations of the PA address the potential needs for monitoring, evaluation, excavation and report preparationThese include an Archeological Testing Plan (Stipulation III), an Archaeological Data Recovery Program (Stipulation III.D), archaeological and Native American monitoring with an Archaeological Monitoring Program (Stipulation III.E), a Final Archaeological Resources Report (Stipulation III.F), consultation with descendant communities (Stipulation IV), treatment of human remains of Native American origin (Stipulation V), and discoveries and unanticipated effects (Stipulation VI). (Draft EIR, p. 4.4-32; Final EIR, p. III-10.)

2. Human Remains

Threshold: Would the Project disturb any human remains, including those interred outside of dedicated cemeteries?

Finding: Less than significant. (Draft EIR, pp. 4.4-32—4.4-33.)

Explanation: 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. (Draft EIR, p. 4.4-32.)

If human remains are encountered during excavations associated with this project, work will halt and the Los Angeles County Coroner will be notified (§ 5097.98 of the Public Resources Code). The Coroner will determine whether the remains are recent human origin or older Native American ancestry. If the coroner, with the aid of the supervising archaeologist, determines that the remains are prehistoric, they will contact the NAHC. The NAHC will be responsible for designating the most likely descendant (MLD), who will be responsible for the ultimate disposition of the remains, as required by § 7050.5 of the California Health and Safety Code. The MLD will make recommendations within 24 hours of his or her notification by the NAHC. These recommendations may include scientific removal and nondestructive analysis of human remains and items associated with Native American burials (§ 7050.5 of the Health and Safety Code). Grading activities associated with development of the project would cause new subsurface disturbance and could result in the unanticipated discovery of unknown human remains, including those interred outside of formal cemeteries. In the event of an unexpected discovery, those remains would require proper treatment, in accordance with applicable laws. State of California Public Resources Health and Safety Code §§ 7050.5-7055, and § 5097.98 of the California PRC, describe the general provisions for human remains. Following compliance with State regulations, which detail the appropriate actions

necessary in the event human remains are encountered, impacts in this regard would be less than significant. .**The project would have a less than significant impact with respect to this threshold. Therefore, a less than significant impact would occur and no further analysis is required.** (Draft EIR, pp. 4.4-32—4.4-33.)

F. GEOLOGY AND SOILS

1. Faults, Ground Shaking, Liquefaction, and Landslides

Threshold: Would the Project expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:

- 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?

Finding: Less than significant. (Draft EIR, pp. 4.5-28—4.5-31.)

Explanation: **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?**

The Project Site is not located within a state-designated Alquist-Priolo Earthquake Fault Zone or a city-designated Preliminary Fault Rupture Study Area for surface fault rupture hazards. No active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the site. The potential for surface rupture due to faulting occurring beneath the site during the design life of the proposed development is considered low. **Therefore, the Project would have a less-than-significant impact regarding rupture of a known earthquake fault and no mitigation for this threshold is required.** (Draft EIR, p. 4.5-29.)

Landslides?

The area just west of the Project Site is mapped as an earthquake-induced landslide zone, however, the topography within the Project Site is relatively flat. The site slopes to the southeast at a gradient flatter than 5:1 (H: V). The site is located within a City of Los Angeles Hillside Grading Area and a Hillside Ordinance Area. However, the site is not located within an area identified as having a potential for seismic slope instability by the state of California. There are no known landslides near the site, nor is the site in the path of any known or potential landslides. Therefore, the probability of slope stability hazards affecting the site is considered very low. **Therefore, the Project would have a less-than-significant impact regarding landslides and no mitigation for this threshold is required.** (Draft EIR, p. 4.5-31.)

2. Erosion

Threshold: Would the Project result in substantial soil erosion or the **loss** of topsoil?

Finding: Less than significant. (Draft EIR, p. 4.5-31—4.5-32.)

Explanation: The soil mapped on the majority of the Project Site is Urban land Ballona Typic Xerorthents, fine substratum complex, 0 to 5 percent slopes (Map unit 1137; Soil Survey Staff, 2017). This soil type is comprised of discontinuous human transported material placed over young alluvium derived from sedimentary rock – i.e., fill material imported during construction of the existing homes on the Project Site to create a level surface on which to build.

This soil type has not been rated for wind or water erodibility by the NRCS Soil Survey, and therefore determinations cannot be made regarding its potential wind or water erodibility. However, during construction of the Project, wind and water erosion would be minimized by implementation of best management practices, described in the required SWPPP, that are intended specifically to avoid or minimize erosion by wind and water during the construction process to maintain compliance with the required Construction General Permit (Order 2009 009 DWQ, as amended). **Potential impacts resulting from wind and water erosion during construction would therefore be less than significant.** (Draft EIR, p. 4.5-31.)

Upon completion of the Project, the Project Site would be covered by permeable and impervious surfaces (e.g., new apartments, parking areas, walkways) and the remainder would be covered in landscape vegetation, all of which would prevent or minimize the potential for wind and water erosion. **The post construction impact resulting from wind and water erosion would be less than significant.** (Draft EIR, p. 4.5-31.)

Based on the discussion above, Project impacts related to soil erosion during Project construction and operation would be less than significant. (Draft EIR, p. 4.5-32.)

3. Septic Tanks

Threshold: 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?

Finding: No impacts. (Draft EIR, p. 4.5-35.)

Explanation: The Project would not include septic tanks or alternative waste water disposal systems. **Therefore, no impacts associated with septic tanks or alternative waste water disposal systems would occur and no mitigation for this threshold is required**. (Draft EIR, p. 4.5-35.)

G. GREENHOUSE GAS EMISSIONS

1. Emissions Generation

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

Finding: Less than significant. (Draft EIR, p. 4.6-12—4.6-14.)

Explanation: The estimates for this analysis include the following sources of annual direct and indirect GHG emissions: (1) area sources (e.g., landscaping related fuel combustion sources); (2) energy use associated with residential buildings; (3) water and wastewater; (4) solid waste; (5) mobile sources (e.g., passenger vehicles and trucks); and (6) construction activity. The ongoing operational emissions consist of the first five categories, while emissions associated with construction are generated only during construction. The typical types of GHG gases emitted from developments such as the Project are CO2, CH4, and N2O. (Draft EIR, p. 4.6-12.)

Construction emissions are from offroad equipment and onroad vehicles such as worker and vendor commuting and trucks for soil and material hauling. CalEEMod defaults were used for construction activity and equipment usage, except that phase lengths were proportionately adjusted to reflect estimated durations supplied by the Project proponent. To assess the temporary construction effect on the Project's overall lifetime GHG emissions, the SCAQMD developed an Interim Guidance (SCAQMD, 2008) recommending that construction emissions should be amortized over the life of the Project, defined in the Guidance as 30 years, which is then added to the operational emissions and compared to the applicable GHG significance threshold. (Draft EIR, p. 4.6-13.)

GHG emissions would also continue to occur every year after buildout. GHGs are emitted from buildings because of activities for which electricity and natural gas are typically used as energy sources. Combustion of any type of fossil fuel emits CO2 and other GHGs directly into the atmosphere; these emissions are considered direct emissions when associated with a building. GHGs are also emitted during the generation of electricity from fossil fuels; these emissions are indirect emissions as they occur elsewhere but are attributed to the power usage onsite. Indirect GHG emissions also result from the production of electricity used to convey, treat, and distribute water and wastewater. In addition, CalEEMod calculates the indirect GHG emissions associated with waste that is disposed of at a landfill using waste disposal rates by land use and overall composition. CalEEMod defaults were used throughout. (Draft EIR, p. 4.6-13.)

Table 4.6-2 of the Final EIR shows the predicted GHG emissions during each construction year. Total GHG emissions are estimated to be 1,159 MT CO2e, which would amortize to 38.6 MT CO2e per year. (Final EIR, p. III-3.)

Additionally, since this Project will be replacing an existing project of the same category, the GHG impacts associated with this Project comprise the net change from the current situation. A summary of GHG emissions from the existing housing and proposed Project is presented in Table 4.6 3 of the Draft EIR. (Draft EIR, p. 4.6-13.)

It is widely recognized that no single project could generate enough GHG emissions to noticeably change the global climate. However, the combination of GHG emissions from past, present, and future projects could contribute substantially to global climate change. Thus, Project specific GHG emissions should be evaluated in terms of whether they would result in a cumulatively significant impact on global climate change. (Draft EIR, p. 4.6-13.)

Total GHG emissions were not compared with a numeric threshold. It is clear, however that the Project's net emissions of 755 metric tons per year are minor. For example, they represent about 0.00018% of the statewide total in 2016. Table 4.6 3 of the Draft EIR demonstrates that the Project will have a less than significant cumulative effect. In addition, GHG emissions will decrease from 4.47 to 2.66 MT CO2e per resident per year, or by about 40%. **Therefore, project impacts related to GHG emissions would be less than significant.** (Draft EIR, p. 4.6-14.)

2. Emission Reduction Plans

Threshold: Would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of greenhouse gases?

Finding: Less than significant. (Draft EIR, pp. 4.6-14—4.6-.)

Explanation: **Consistency with Applicable Plans and Policies**

AB 32 Scoping Plan

The AB 32 Scoping Plan, which was discussed in Section 4.6.2.2 of the Draft EIR, has a variety of measures, developed and implemented largely at the state level, to reduce statewide GHG emissions to 1990 levels by 2020. Subsequent legislation and updates to the AB-32 Scoping Plan have required even greater reductions. Emission reduction actions include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms (such as cap-and-trade), and an AB 32 implementation fee to fund the program. Table 4.6-4 of the Draft EIR summarizes AB 32 Scoping Plan elements that are potentially relevant to the Project, along with an analysis of the Project's consistency with them. Table 4.6-5 of the Draft EIR does the same for policies and measures that were part of the 2017 update to the AB 32 Scoping Plan. Note that not all of the provisions of the 2017 update have been implemented yet. (Draft EIR, p. 4.6-14.)

In view of the findings in Table 4.6-4 and Table 4.6-5 of the Draft EIR, the Project would be consistent with the GHG reduction-related

actions and strategies in the 2008 AB 32 Scoping Plan and subsequent updates, and related impacts would be less than significant. (Draft EIR, p. 4.6-14.)

2016-2040 RTP/SCS

The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (SCAG, 2016) contains measures that are expected to significantly reduce vehicle miles traveled (VMT) in southern California, and thereby reduce GHG emissions. The analysis in Section 4.2.5.1 of the Draft EIR demonstrates the Project's consistency with the growth projections in the 2016-2040 RTP/SCS. The analysis took into account development such as the Project in its modeling and analyses and the 2016-2040 RTP/SCS vehicle trip and VMT reduction goals and policies. (Draft EIR, p. 4.6-14.)

The strategies and policies of the 2016-2040 RTP/SCS for reducing GHG emissions in the SCAG region can be grouped into three categories: (1) reducing vehicle trips and VMT, (2) increased use of alternative fuel vehicles, and (3) increased energy efficiency. (Draft EIR, p. 4.6-14.)

Reducing Vehicle Trips. According to the CalEEMod analysis for the Project, annual VMT in the operational phase would be 2,545,524. As discussed in Section 4.2.5.1 of Draft EIR, the site population is estimated to be 656. Daily per capita VMT would therefore be 10.47. This is below the daily per capita VMT of 18.4 that the RTP/SCS predicts for 2040. Therefore, the Project is compatible with the 2016-2040 RTP/SCS. (Draft EIR, p. 4.6-26.)

Increased Use of Alternative Fueled Vehicles. The Project will neither help nor hinder implementation of this measure. (Draft EIR, p. 4.6-14.)

Increased Energy Efficiency. Project design features **GHG-PDF-1** and **GHG-PDF-12** would reduce the use of energy by the Project. **GHG-PDF-12**, in particular, would prevent combustion of natural gas and thus reduce GHG emissions. Therefore, the Project is compatible with the 2016-2040 RTP/SCS. (Draft EIR, p. 4.6-14.)

In consideration of the above, the Project would be consistent with the GHG reduction-related actions and strategies in the 2016-2040 RTP/SCS, and related impacts would be less than significant. (Draft EIR, p. 4.6-14.)

LA Green Plan/ClimateLA

The City of Los Angeles has implemented the LA Green Plan, which outlines the goals and actions that the City has established to reduce the generation and emission of GHGs from public and private activities. The LA Green Plan has the goal of reducing emissions of CO2 to 35% below 1990 levels by the year 2030. To achieve this goal, the City is increasing the generation of renewable energy, improving energy conservation and

efficiency, and changing transportation and land use patterns to reduce dependence on automobiles. Table 4.6-6 of Draft EIR summarizes LA Green Plan elements that are potentially relevant to the Project, along with an analysis of the Project's consistency with them. (Draft EIR, p. 4.6-26.)

The proposed Project does not conflict with any of the proposed actions addressed in the LA Green Plan and the LA Green Building Code that allows the City to meet their goals, therefore the proposed Project impacts related to conflict with policies for reduction of GHG emissions would be less than significant. (Draft EIR, p. 4.6-29.)

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

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

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

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

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

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

GHG-PDF-7: Use of high-efficiency Energy Star appliances, where appropriate.

GHG-PDF-8: Use of weather-based irrigation controller with rain shutoff, matched precipitation (flow) rates for sprinkler heads, and rotating sprinkler nozzles or comparable technology such as drip/micro spray/subsurface irrigation where appropriate.

GHG-PDF-9: Installation of a separate water meter (or submeter), flow sensor, and master valve shutoff for irrigated landscape areas totaling 5,000 square feet and greater.

GHG-PDF-10: Use of proper hydro-zoning and turf minimization, as feasible.

GHG-PDF-11: Installation of pre-treatment stormwater infrastructure for the stormwater treatment system.

GHG-PDF-12: Reduce stormwater runoff through the introduction of new landscaped

areas throughout the Project Site and/or on the structure.

GHG-PDF-13: Prohibit the use of any fireplaces in the proposed residential units.

H. HAZARDS AND HAZARDOUS MATERIALS

1. Hazardous Materials

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

Finding: Less than significant. (Draft EIR, pp. 4.7-10—4.7-11.)

Explanation: Construction and operation of the Project would involve transport, storage, and use of chemical agents, solvents, paints, and other hazardous materials. Chemical transport, storage, and use would comply with RCRA, CERCLA, OSHA, California hazardous waste control law, Division of OSHA, SCAQMD, Los Angeles County Department of Public Health and LAFD requirements. (Draft EIR, p. 4.7-10.)

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. (Draft EIR, p. 4.7-10.)

Compliance with federal, state, and local regulations regarding the routine transport, use, or disposal of hazardous materials would minimize or avoid impacts related to hazardous materials. **Therefore, it is not anticipated that the Project would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials and impacts would be less than significant.** (Draft EIR, pp. 4.7-10—4.7-11.)

2. Accident or Update

Threshold: Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Finding: Less than significant. (Draft EIR, pp. 4.7-11—4.7-12.)

Explanation: **Recognized Environmental Conditions**

The following Recognized Environmental Conditions (i.e., ACM, LBP, lead, and radon gas) were identified on the Project Site (Altec, 2018).

ACM. Since the existing site has construction material that contains asbestos, the resulting construction debris would have to be disposed of at a landfill that can accept asbestos. The nearest acceptable landfill would be Waste Management Inc.'s Azusa Land Reclamation site at 1211 West Gladstone in Azusa (Waste Management, 2018), approximately 23 miles from the Project Site. All ACMs, LBP, and lead in plumbing components and/or water supply lines identified on the Project Site would be removed prior to demolition, as required, and in accordance with all applicable laws, including guidelines of the OSHA. **With removal of these hazardous materials prior to demolition, as required, and in accordance with all applicable laws, impacts from ACMs would be less than significant.** (Draft EIR, p. 4.7-11.)

LBP: LBP was identified at the site during paint sampling and soil sampling performed June 7, 2016 and December 5, 2016 (Altec, 2016b). As with the ACM discussed above, all LBP and any materials on the site that contain LBP, would be removed prior to demolition, as required, and in accordance with all applicable laws, including guidelines of the OSHA. **With demolition of the existing buildings, in accordance with all applicable laws, impacts from LBP would be less than significant**. (Draft EIR, p. 4.7-11.)

Lead in Drinking Water. There is a potential for lead to be in drinking water as a result of its leaching from plumbing components, including water supply lines. Considering that existing buildings on the Project Site would be demolished, lead in drinking water sampling does not appear to be necessary at this time (Altec, 2018, p. 51). **Because all buildings on the Project Site would be demolished, and the new plumbing installed would be required to meet current standards for lead content, there would be no potential impacts regarding lead in drinking water for future Project tenants.** (Draft EIR, pp. 4.7-11—4.7-12.)

3. Hazards Near Schools

Threshold: 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?

Finding: Less than significant. (Draft EIR, p. 4.7-12.)

Explanation: Our Lady of Guadalupe School (TK – 8) is located approximately 50 feet east of the Project Site. The Project is anticipated to store and use products such as fuel, cleaning products, etc. during the construction phase. Upon Project buildout, it is anticipated that residents could store small amounts of potentially hazardous substances such as cleaning products. Onsite maintenance may include the use and storage of pest and weed control substances, which would be stored and used per applicable laws and regulations. These commercially available janitorial and landscaping supplies during operation would not be used in quantities sufficient to cause a potential hazard. (Draft EIR, p. 4.7-12.)

The Project would be required to comply with notice and consultation requirements applicable to schools in Public Resources Code (PRC) § 21151.4 (of the CEQA statute) and state CEQA Guidelines § 15186. PRC § 21151.4, which pertains to projects within 0.25 mile of a school, contains requirements regarding certification of environmental documents for projects that might reasonably be anticipated to emit hazardous air emissions or that would handle extremely hazardous substance or a mixture containing such substances in a quantity equal to or greater than the state threshold quantity specified pursuant to subdivision (j) of § 25532 of the Health and Safety Code. Since the Project would be the same residential use as the existing use at the site, no hazardous air emissions are anticipated to be emitted and no extremely hazardous substances or mixtures containing such substances are expected to be stored or used at the site.(Draft EIR, p. 4.7-12.)

While the Project is within 0.25 mile of an existing school, removal of ACMs, LBPs, and lead in plumbing components and/or water supply lines will be completed in accordance with all applicable laws and mitigation measures and would not result in a potential hazard. (Draft EIR, p. 4.7-12.)

The limited quantities of hazardous materials, as described above, are unlikely to pose a risk to schools in the Project vicinity. Furthermore, occupancy of the proposed residential development would not cause hazardous substance emissions or generate hazardous waste. **Therefore, it is concluded that the Project would result in less than significant impacts at any existing or proposed schools within 0.25 mile of the Project Site.** (Draft EIR, p. 4.7-12.)

4. Waste Sites

Threshold: Would the Project 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?

Finding: Less than significant. (Draft EIR, pp. 4.7-12—4.7-13.)

Explanation: The Project Site is listed on the California Environmental Protection Agency (CalEPA) DTSC HAZNET database for “other organic solids” removed for offsite disposal in 2003 and 1998. Listing on the HAZNET database is not of concern for the Project because the organic solids were removed and disposed of offsite. Furthermore, since the Project Site was not identified on the Cortese List, the Project would have a less than significant impact in this regard. **Therefore, there would be a less than significant impact with respect to this threshold and no mitigation is required.** (Draft EIR, p. 4.7-13.)

5. Public Airports

Threshold: 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?

Finding: No impact. (Draft EIR, p. 4.7-13.)

Explanation: The Project is not located within the boundary of an Airport Influence Area, or within two miles of a public airport or public use airport. For these reasons, the Project would not expose people to safety hazards due to proximity to a public airport, and no impacts would occur. **Therefore, there would be no impact with respect to this threshold and no mitigation is required**. (Draft EIR, p. 4.7-13.)

6. Emergency Plans

Threshold: Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Finding: No impact. (Draft EIR, pp. 4.7-1—4.7-14.)

Explanation: The project site is not directly accessed by a road designated as a disaster route. However, a portion of Huntington Drive, located within 1,000 feet southeast of the Project Site, is a designated disaster route. (Draft EIR, p. 4.7-13.)

Construction

Construction activities for the Project would be primarily confined to the Project Site and would only include minor offsite improvements in the public right of way for utilities such as water, sewer, and electricity. These offsite improvements would be limited to only the public right of way in the streets surrounding the Project Site; Florizel Street, Boundary Avenue, McKenzie Avenue, and Mercury Avenue. (Draft EIR, p. 4.7-13.)

In addition, a Construction Management Plan will be implemented during construction of the Project to ensure that adequate and safe access remains available within and near the Project Site during construction activities. The Construction Management Plan will detail how parking will be managed during Phase I and Phase II of Project construction. The parking management plan will specify where onsite and offsite parking will be available during both phases of Project construction. The Construction Management Plan will include a street closure plan that details how vehicle traffic (including bus traffic, and potential temporary bus stop closure or relocation along Mercury Avenue), pedestrian traffic, and bicycle traffic will flow during temporary street closures during both Phase I and Phase II of Project construction. (Draft EIR, pp. 4.7-13.)

The Project Site is not adjacent to nor accessed by a road designated as a disaster route. The Project would also comply with all applicable codes and ordinances for emergency access. Therefore, with adherence to

regulatory requirements and implementation of a Construction Management Plan, construction of the project would not impair implementation of, or physically interfere with, any adopted or onsite emergency response or evacuation plans. **Therefore, there would be no impacts related to an adopted emergency response plan or emergency evacuation plan during construction.** (Draft EIR, pp. 4.7-13—4.7-14.)

Operation

During operation, the Project would not involve any activities that would impede public access or travel along the public right-of-way or interfere with an adopted emergency response or evacuation plan. The Project site plan will be reviewed by the Los Angeles Fire Department and the Project complies with all emergency access and sight line requirements. Therefore, the Project would not result in inadequate emergency access during operation and no impacts would occur. In addition, the increase in traffic generated by the Project would not significantly impact emergency vehicle response to the Project Site and surrounding uses, including along City-designated disaster routes since the drivers of emergency vehicles are able to avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic**. Therefore, there would be no impacts associated with emergency response and emergency evacuation plans.** (Draft EIR, p. 4.7-14.)

Furthermore, the Project would not include a land use that would constitute a potential hazard to the community (such as an airport, oil refinery, or chemicals plant), nor would it close any existing streets or otherwise represent a significant impediment to emergency response and evacuation of the local area. The Project's proposed land uses would not require a new, or interfere with an existing, risk management, emergency response, or evacuation plan. **Therefore, the Project would have no impact with respect to this threshold and no mitigation is required.** (Draft EIR, p. 4.7-14.)

7. Wildland Fires

Threshold: 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?

Finding: Less than significant. (Draft EIR, p. 4.7-14.)

Explanation: The Project Site is not located within a State Responsibility Area (SRA) Fire Hazard Severity Zone but it is located within a Local Responsibility Area (LRA) Very High Fire Hazard Severity Zone. The Project would include required fire suppression design features. The landscape design would include plant materials that are both drought tolerant and fire retardant, a permeant automatic irrigation system, and landscaping would be maintained on regular schedule. Furthermore, the Project would be

required to comply with City of Los Angeles Building Code and safety regulations pertaining to development in a Very High Fire Hazard Severity Zone. The Project is required to comply with all applicable chapters of the City of Los Angeles Fire Code. With compliance with all applicable regulations, the Project would have less than significant impacts related to risk of loss, injury or death involving wildland fires. **Therefore, the Project would have a less than significant impact with respect to this threshold and no mitigation is required.** (Draft EIR, p. 4.7-14.)

I. HYDROLOGY AND WATER QUALITY

1. Water Quality Standards

Threshold: Would the Project violate any water quality standards or waste discharge requirements?

Finding: Less than significant. (IS, p. 4.9-2.)

Explanation: 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.). (IS, p. 4.9-2.)

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. As shown in Table 4.9-1 of the Initial Study, 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. (IS, p. 4.9-2.)

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. (IS, p. 4.9-3.)

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.** (IS, p. 4.9-3.)

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. (IS, p. 4.9-3.)

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. (IS, pp. 4.9-3—4.9-4.)

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. (IS, p. 4.9-4.)

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. (IS, p. 4.9-4.)

2. Groundwater Supplies

Threshold: Would the Project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?

Finding: Less than significant. (IS, p 4.9-3.)

Explanation: 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). (IS, p. 4.9-4.)

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. 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.** (IS, p. 4.9-4.)

3. Erosion or Siltation

Threshold: 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?

Finding: Less than significant. (IS, p. 4.9-5—4.9-6.)

Explanation: 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.** (IS, p. 4.9-5.)

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. (IS, p. 4.9-5.)

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. (IS, pp. 4.9-5.)

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.** (IS, pp. 4.9-5—4.9-6.)

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**. (IS, p. 4.9-6.)

4. Flooding

Threshold: 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 substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Finding: Less than significant. (IS, p. 4.9-6.)

Explanation: 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 besubject 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**. (IS, pp. 4.9-6—4.9-7.)

5. Runoff

Threshold: 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?

Finding: Less than significant. (IS, p. 4.9-7.)

Explanation: The project would redevelop the site with impervious surfaces such as parking areas and buildings. 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.** (IS, p. 4.9-7.)

6. Water Quality

Threshold: Would the project otherwise substantially degrade water quality?

Finding: Less than significant. (IS, p. 4.9-7.)

Explanation: 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**. (IS, p. 4.9-7.)

7. Water Quality Control Plan

Threshold: 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?

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

Finding: No impact. (IS, p. 4.9-8.)

Explanation: The project site is in Federal Emergency Management FEMA Flood Insurance Rate Map (FIRM), Zone X, 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.** (IS, p. 4.9-8.)

8. Flood Hazard

Threshold: 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?

Finding: No impact. (IS, p. 4.9-8.)

Explanation: 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.** (IS, p. 4.9-8.)

9. Seiche, Tsunami, Mudflow

Threshold: Would the Project cause inundation by seiche, tsunami, or mudflow?

Finding: Less than significant. (IS, p. 4.9-9.)

Explanation: 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. (IS, p. 4.9-9.)

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. (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). (IS, p. 4.9-9.)

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). (IS, p. 4.9-9.)

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**. (IS, p. 4.9-9.)

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 the Draft EIR) 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.** (IS, p. 4.9-9.)

J. LAND USE AND PLANNING

1. Established Communities

Threshold: Would the Project physically divide an established community?

Finding: No impact. (Draft EIR, pp. 4.8-21—4.8-22.)

Explanation: The Project is the redevelopment of the existing Rose Hill Courts multi-family public housing complex that was originally built in 1942. The 5.24-acre Project Site is located within the Northeast Los Angeles Community Plan area, in the El Sereno Community of the City. Only the existing Rose Hill Courts Site would be redeveloped. The Project would provide new and additional affordable housing uses that would be compatible with and would complement existing and future development within the Project area. The Project would represent the existing surrounding urban environment. (Draft EIR, p. 4.8-21.)

Based on extensive outreach to the residents on the site and the community, the Project has been designed to provide high quality, multi-family housing, at a scale that is contextual and appropriate for the Site and the community. The architectural plan is based on creating a development with multiple building and unit types with shared amenities. While the Project would increase the density, scale, and height of development on the Project Site, these changes would not be out of character with the surrounding area, which is an urbanized neighborhood characterized by similar land uses. The Project Site is specifically located in an area that is characterized by single- and multi-family uses, including the existing Rose Hill Courts. The proposed two- to four-story buildings would be compatible with existing low-rise buildings in the vicinity of the Project Site, including the homes located on the surrounding hillside at a higher elevation. Therefore, the Project's proposed residential use would be consistent with the scale of the existing uses within, and surrounding, the Project Site. (Draft EIR, p. 4.8-21.)

The Project would not divide an existing established community or public use spaces within a community in the vicinity of the Project Site, nor would it extend beyond the Project Site's existing boundaries. Furthermore, no streets or sidewalks would be permanently closed as a result of the redevelopment. The Project would utilize existing public roadways; thus, there would be no change in public roadway patterns. No separation of uses or disruption of access between land use types would occur as a result of the Project. (Draft EIR, p. 4.8-21.)

The Project would improve and enhance the existing streetscape surrounding the Project Site to promote pedestrian activity and continued access to public transportation and adjacent parks. Consistent with surrounding areas, the Project would include ample open space and recreational amenities to promote continued community outdoor use. The Project would include 125,022 square feet of open space and landscaped areas with walkways. This includes a total landscaped area of 63,653 square feet plus 61,369 square feet of total open space. These spaces would include outdoor communal space with shaded seating and grills, and children's play areas with tot lots, paved surfaces, and several courtyards. Specifically, the Project would create a total of 44,012 square feet of common outdoor space and 9,350 square feet of private open space, in addition to 8,007 square feet of common indoor space. The Project would include a 6,366 square foot Community Building and a "Central Park" green space, creating a park like setting for residents. The

central green space would include several activity areas, places for social gatherings, children and teen play areas, and several other amenities. Additionally, new pedestrian access points would be created throughout the Project Site via pedestrian walkways connecting to the interior central green space between the individual buildings. The pedestrian walkways would provide access to Rose Hill Park to the north, to Ernest E. Debs Regional Park to the west, and to the Rose Hill Recreation Center to the south. All buildings would either connect directly to perimeter streets or provide walkways connecting to perimeter streets. (Draft EIR, pp. 4.8-21—4.8-22.)

Based on the analysis above, the Project would not substantially or adversely change the existing land use relationships between the Project Site and existing offsite uses, or have a long-term effect of adversely altering a neighborhood or community through ongoing disruption, division, or isolation. Therefore, the Project would not physically divide an established community, would have no impact with respect to this threshold and no mitigation is required. (Draft EIR, p. 4.8-22.)

2. Conflicts With Plans

Threshold: Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Finding: Less than significant. (Draft EIR, pp. 4.8-22--4.8-38.)

Explanation: **Project Consistency Analysis with Applicable Plans and Policies**

The Project Site has a current zoning designation for single-family residential development. Therefore, the existing Rose Hill Courts development is a legal non-conforming land use because the existing development with multi-family housing units predates the R1 zoning. The Project proposes multi-family development that requires a Public Benefit approval under Los Angeles Municipal Code § 14.00.B. Additionally, the applicant is requesting an Affordable Housing Density Bonus (SB 1818), as identified in LAMC § 12.22 A.25, with off-menu incentives. Providing a Public Benefit approval as well as a Density Bonus would allow for the Project to be constructed without a General Plan Amendment or zone change from the City of Los Angeles. (Draft EIR, p. 4.8-22.)

The analysis of potential land use impacts considers consistency of the project with adopted plans, regulations, and development guidelines, and in some instances, advisory guidance, that regulate land use on the Project Site. The State CEQA Guidelines § 15125(d) requires that an EIR discuss any project inconsistencies with land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. For purposes of this analysis, the project is considered consistent with regulatory land use plans if it meets the general intent of the plans and/or would not preclude the attainment of

their primary goals and objectives. The criterion for determining a significant land use plan impact is based on the potential for the project to substantively conflict with, or actively obstruct the implementation of applicable land use plans and related objectives, goals and policies. The tables listed in Section 4.8 of the Draft EIR list applicable land use policies and regulations and the project's consistency with each. (Draft EIR, p. 4.8-22.)

City of Los Angeles General Plan

Table 4.8 2 of the Draft EIR compares the Project's design characteristics to the applicable objectives, goals and policies identified in the City's General Plan: Framework Element, Health and Wellness Element (i.e., Plan for a Healthy Los Angeles), Air Quality Element, Conservation Element, Housing Element, Noise Element, Open Space Element, Service Systems Element/Public Recreation Plan Element, Safety Element and Mobility Element (i.e., Mobility Plan 2035). As shown in Table 4.8-2 of the Draft EIR, the Project would be consistent with all but one of the General Plan policies and therefore, **impacts would be less than significant**. (Draft EIR, p. 4.8-23.)

City of Los Angeles Walkability Checklist

Table 4.8 3 of the Draft EIR compares the Project's design characteristics to the objectives and goals of the City's Walkability Checklist. As shown in the table in Section 4.8 of the Draft EIR, the Project would be consistent with the Walkability Checklist requirements and **therefore, impacts would be less than significant**. (Draft EIR, p. 4.8-29.)

Northeast Los Angeles Community Plan

Table 4.8 4 of the Draft EIR compares the Project's design characteristics to the policies, objectives and goals of the Northeast Los Angeles Community Plan. As shown in the tables in Section 4.8 of the Draft EIR, the Project would be consistent with the Northeast Los Angeles Community Plan policies and **therefore, impacts would be less than significant**. (Draft EIR, p. 4.8-32.)

SCAG Regional Comprehensive Plan

Table 4.8 5 of the Draft EIR compares the Project's consistency with the goals and principles set forth in the SCAG Regional Comprehensive Plan. As shown in the tables in Section 4.8 of the Draft EIR, the Project would be consistent with the goals and principles contained in the RCP, **therefore, impacts would be less than significant**. (Draft EIR, p. 4.8-34.)

Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

Table 4.8 6 of the Draft EIR compares the Project's consistency with the goals and principles set forth in the SCAG RTP/SCS. As shown in the tables Section 4.8 of the Draft EIR, the Project would be consistent with goals and principles contained in the RTP/SCS and **therefore, impacts would be less than significant**. (Draft EIR, p. 4.8-38.)

Based on policy consistency analysis provided in the tables above, the Project would be substantially consistent with applicable state, regional and local plans, goals, objectives and policies that govern development in the Project area. Therefore, impacts related to land use consistency would be less than significant. (Draft EIR, p. 4.8-38.)

K. MINERAL RESOURCES

1. Regional and Statewide Mineral Resources

Threshold: 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?

Finding: No impact. (IS, p. 4.11-1.)

Explanation: 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.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**. (IS, p. 4.11-1.)

2. Locally-Important Mineral Resource

Threshold: 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 ?

Finding: No impact. (IS, p. 4.11-1.)

Explanation: 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. 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.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**. (IS, p. 4.11-1.)

L. NOISE

1. Noise Standards

Threshold: Would the Project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Finding: Less than significant. (Draft EIR, pp. 4.9-16—4.9-17.)

Explanation: **Permanent (Operational) Impacts**

The Project would replace the existing buildings, and it would increase the number of residents. However, the Project would not introduce major new onsite noise sources or bring existing noise sources closer to sensitive receivers.

In a residential area, traffic noise predominates. Rooftop equipment usually emits about 50 to 55 dB at 50 feet. Trash pickup may be loud but it is for only a few minutes or so once a week, so does not contribute to the hourly Leq. Noise from radios, televisions and other entertainment devices may be loud but it is limited by the City's municipal code. The ambient noise values in Table 4.9-3 of the Draft EIR are typical of onsite background noise, since the measurement points were shielded to a large extent from traffic. The three onsite Leq values average 50.2 dBA. With an increase to the proposed number of residents from 221 to 656, and the assumption that the noise generated is proportional to the number of residents, the new noise generation would be about 54.9 dBA. Given all the buildings onsite, this noise would substantially be blocked before it left the Project Site. In any event, the unblocked increase of about 4.7 dBA would not be significant. **Therefore, there would be no change in exposure to the community and the impact would be less than significant.** (Draft EIR, p. 4.9-17.)

For offsite, onroad noise impacts to be significant, it is generally necessary for traffic to double. Intersection turning counts extracted by KOA from the traffic impact study were used to estimate traffic along segments in the Project area during the a.m. peak hour. The turning data were for the future without Project and future with Project scenarios. Table 4.9 8 of the Draft EIR shows the results of the analysis. The maximum increase in traffic on the segments studied would be about 26 percent, which is far less than a doubling. For one segment, McKenzie Avenue between Browne Avenue and Mercury Avenue, traffic would

decrease because of the Project. **The noise level increase due to the Project would be less than significant.** (Draft EIR, p. 4.9-17.)

2. Vibration

Threshold: Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?

Finding: Less than significant. (Draft EIR, pp. 4.9-18—4.9-19.)

Explanation: It is expected that ground borne vibration from Project construction activities would cause only intermittent, localized intrusion. The Project's construction activities most likely to cause vibration impacts are:

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

- **Trucks**: Trucks hauling building materials to construction sites can be sources of vibration intrusion if the haul routes pass through residential neighborhoods on streets with bumps or potholes. Repairing the bumps and potholes almost always eliminates the problem. (Draft EIR, p. 4.9-18.)

The FTA (2018) has published standard vibration levels for construction equipment operations, at a reference distance of 25 feet. The smallest distance from a sensitive receiver and construction activity for this Project is 49 feet. The calculated vibration levels expressed in VdB and PPV for typical construction equipment at distances of 25, 50, and 49 feet are listed in Table 4.9 9 of the Draft EIR. (Draft EIR, p. 4.9-18.)

The FTA's annoyance thresholds for vibration depend upon the frequency of vibration events. The CalEEMod analysis presented in Section 4.2 pf the Draft EIR estimated 345 truck trips during Phase II demolition. It was assumed that trucks would arrive at the Project Site unloaded and leave loaded. Thus, there would be 345 loaded truck trips in 82 days, or about four per day, a value less than 30 events per day. Therefore, truck-related ground-borne vibration events were considered to be infrequent for the purpose of this analysis. As a worst case, other types of vibration events were assumed to be frequent. (Draft EIR, p. 4.9-19.)

As shown in Table 4.9 9 of the Draft EIR, the vibration level of construction equipment at the nearest sensitive receiver (49 feet) is at most 0.0277 inch per second, which is less than the FTA damage threshold of 0.12 inch per second PPV for fragile historic buildings. The maximum vibration exposures from loaded trucks would be 77 VdB, which is less than the FTA threshold for human annoyance of 80 VdB for

infrequent exposure. For other equipment the exposure would be less than or equal to 70 VdB, which is less than the thresholds of 72 and 75 VdB for the relevant receiver categories. Vibration impacts during construction would therefore be less than significant, and no mitigation is necessary. (Draft EIR, p. 4.9-19.)

Residential operations do not involve sources that cause substantial ground borne vibration. **Therefore, the Project would not result in long term significant impacts due to ground borne vibration or noise levels. No mitigation is necessary for operational vibration impacts**. (Draft EIR, p. 4.9-19.)

3. Airport Noise

Threshold: For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Finding: No impact. (Draft EIR p. 4.9-19.)

Explanation: The nearest airport to the Project Site is the El Monte Airport, located approximately 9 miles to the southeast (Google Earth Pro, 2018). The Project Site is not located within an airport influence area or within the vicinity of a private airstrip (County of Los Angeles ALUC, 2012 and Google Earth Pro, 2018). The Project would not expose people to excessive aircraft noise levels. Therefore, no impact would occur. **Thus, the Project would have no impact with respect to this threshold. No impacts from airport or airstrip noise would occur and no mitigation is required**. (Draft EIR, p. 4.9-19.)

M. POPULATION AND HOUSING

1. Population Growth

Threshold: Would the Project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of road or other infrastructure?

Finding: Less than significant. (Draft EIR, pp. 4.10-8—4.10-9.)

Explanation: The Project would not induce substantial unplanned population growth. Construction jobs created by the Project would not result in substantial population growth in the Project area because construction jobs are temporary in nature. It is anticipated that persons filling construction jobs would be from the Los Angeles area and as such, construction workers would not move or relocate to work at the Project Site from outside the Los Angeles area during Project construction. Thus, the construction jobs generated by the Project would not induce substantial population or housing growth within the region. (Draft EIR, p. 4.10-8.)

The Project proposes to increase the number of persons living on the Project Site, compared to existing conditions. The net increase of 435 persons as part of the proposed Project would not result in any unplanned population growth. The population of the City of Los Angeles is anticipated to grow by approximately 763,900 persons compared to 2012 conditions, which equates to a nearly 20 percent increase in population by the year 2040. Therefore, the Project's estimated net increase of 435 persons was anticipated in SCAG's projections of population increase through the year 2040. The Project would not indirectly induce growth in the Project area because public infrastructure currently exists at the Project Site. The Project would not introduce infrastructure to a site that does not already contain infrastructure for electricity, gas, water, and sewer services. Thus, the Project would not indirectly induce growth in the Project area. **Thus, the Project would have a less than significant impact with regard to inducing substantial population or housing growth and regarding inducing growth in the Project area, either directly or indirectly. No further analysis is required**. (Draft EIR, pp. 4.10-8--4.10-9.)

2. Displacement of People

Threshold: Would the Project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

Finding: Less than significant. (Draft EIR, pp. 4.10-9—4.10-10.)

Explanation: The Project would demolish existing residential structures on the Project Site in two phases. During Phase I, 20 units and a community center would be demolished and during Phase II, 80 units would be demolished. At Project completion, the Project Site would contain 185 dwelling units.(Draft EIR, p. 4.10-9.)

Before any tenant relocation occurs, HACLA must approve the Project's Relocation Plan, which is currently under development (49 CFR 24 Subpart C). Consistent with HUD regulations for the treatment of itinerants, current residents who are in good standing will have the option to return to the property after construction is complete. Residents living in those units within the footprint of Phase I who wish to return, will be temporarily relocated until construction of the buildings are complete. The residents who are living in the existing buildings within the footprint of Phase II will be moved and assisted into the Phase I units upon completion. Residents will be provided relocation counseling, compensation for moving expenses, and provided with decent, safe and sanitary housing choices. Additionally, the Relocation Plan will be considered by HACLA'S Board of Commissioners and HACLA, prior to any development at Rose Hill Courts. For relocation activities, Related/HACLA will take into consideration individual household preferences and needs to be close to public transportation, employment, schools, medical/public/social services and agencies, recreational services, parks, community centers, and/or shopping and will attempt to accommodate households by moving them to an available unit onsite. If

such a unit is not available, the next preferred option will be for households to relocate into a nearby motel or an apartment unit and return to Rose Hill Courts as soon as construction of Phase I is complete and the unit is ready for occupancy. For households that prefer to accept a HACLA issued Tenant Section 8 Voucher or Tenant Protection Voucher and permanently relocate from Rose Hill Courts, full relocation assistance for permanent replacement housing will be available.(Draft EIR, p. 4.10-9.)

The Project would nearly double the number of housing units onsite (100 existing compared to 185 proposed) and would not require the construction of replacement housing elsewhere due to temporary relocation of tenants. **Therefore, the Project would have a less than significant impact in this regard**.(Draft EIR, p. 4.10-9.)

The Project would generate approximately 286 permanent residents in the first phase of development and approximately 370 permanent residents in the second phase of development, resulting in a total of 656 residents, which is 435 more residents, compared to January 2019 conditions.(Draft EIR, p. 4.10-9.)

The Project would demolish existing residential structures on the Project Site in two phases. Residents of the buildings demolished during Phase I would be relocated in accordance with an approved Relocation Plan. After Phase I construction activities are completed, residents of buildings planned for demolition during Phase II would relocate to the newly constructed dwelling units or permanently relocate offsite. (Draft EIR, p. 4.10-9.)

Before any resident relocation occurs, HUD must approve the Project's Relocation Plan, which is currently under development (49 CFR 24 Subpart C). Consistent with HUD regulations for the treatment of itinerants, current residents who are in good standing will have the option to return to the property after construction is complete. Residents living within the footprint of Phase I who wish to return, will be temporarily relocated until construction of the buildings is complete. All families will receive relocation assistance. If a few families cannot be accommodated in Phase I they will be provided with a tenant voucher and if they desire to move back, will be provided with the right to return to Phase II. The Project would result in temporary short-term displacement and relocation of the existing tenants residing on the Project Site while units are rehabilitated. When the residents return to a renovated unit, the households would need to be "right sized" under applicable Section 8 occupancy standards and therefore not all residents may be able to immediately return to a permanent right size unit in Phase I. Any residents seeking to move out of Rose Hill Courts would be provided with the choice of availing a portable Section 8 voucher and relocation assistance, which would allow them to move permanently off site. . Residents will be provided relocation counseling, compensation for moving expenses, and provided with decent, safe and sanitary housing choices. Additionally, the Relocation Plan will be considered by the

HACLA Board, prior to any development. **Therefore, impacts associated with the displacement of people would be less than significant.** (Draft EIR, p. 4.10-10.) Residents will be provided relocation counseling, compensation for moving expenses, and provided with decent, safe and sanitary housing choices. Additionally, the Relocation Plan will be considered by the HACLA Board, prior to any development. **Therefore, impacts associated with the displacement of people would be less than significant.** (Draft EIR, p. 4.10-10; Final EIR, pp. III-13 to III-14.)

N. PUBLIC SERVICES

1. Fire Protection

Threshold: 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, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services?

Finding: Less than significant. (Draft EIR, pp. 4.11.a-5—4.11.a-7.)

Explanation: **Project Construction**

During Phase I of Project construction, fewer persons would be living at the Project Site, compared to existing conditions, which would incrementally decrease the demand on fire services. Once Phase I of Project construction is complete, residents would move into the Phase I construction, which would be built in compliance with current City of Los Angeles fire codes. (Draft EIR, p. 4.11.a-6.)

Construction activities could potentially increase the risk of fires by exposing combustible building materials such as wood, coverings and coatings to exposed electrical lines, sparks from construction equipment, and lighted cigarettes. The Occupational Safety and Health Administration enforces standards for safe and healthful working conditions for workers during construction. The required safety and health regulations for construction sites are included in the Code of Federal Regulations (CFR), Title 29, Part 1926. In accordance with these requirements, construction workers would be trained in emergency response and fire safety operations including the monitoring and management of life safety systems. Additionally, in accordance with the safety requirements related to fire protection and prevention for construction sites listed in CFR Part 1926, Subpart F, the project would include provision of adequate fire suppression and fire-fighting equipment on the construction site, sufficient water supply, and keep storage sites free from accumulation of unnecessary combustible materials. Project construction would occur in compliance with applicable federal, state and local requirements for handling, use, storage and disposal of hazardous materials. With compliance with applicable regulatory requirements,

impacts related to increased fire risk during Project construction would be less than significant. (Draft EIR, p. 4.11.a-6.)

Project construction activities and construction staging areas would be contained within the boundary of the Project Site. Therefore, the Project would not have a significant impact on the provision of fire protection services in the vicinity of the Project Site, during the construction phase. (Draft EIR, p. 4.11.a-6.)

Based on the discussion above, the Project would have less than significant impacts on fire protection services during Project construction. (Draft EIR, p. 4.11.a-6.)

Project Operation

The Project is expected to result in an increase of 85 housing units and 435 more residents, compared to current (January 2019) conditions which could increase the demand for LAFD services. (Draft EIR, p. 4.11.a-6.)

The LAFD considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed. Pursuant to § 57.09.07A of the LAMC, the maximum response distance between residential land uses and a LAFD fire station that houses an engine or truck company is 1.5 miles. If this distance is exceeded, all structures located in the applicable residential area would be required to install automatic fire sprinkler systems. With such systems installed, fire protection would be considered adequate even if the project is located beyond the maximum response distance. (Draft EIR, p. 4.11.a-6.)

The Project Site is served by Station No. 47 located approximately 0.25 mile south of the Project Site. The current response time of Station No. 47 to the Project area (El Sereno) is five minutes and twelve seconds (LAFD, 2019). Based on the response distance criteria specified in LAMC 57.09.07A and the relatively short distance from Fire Station No. 47 to the Project Site, fire protection response is considered adequate to serve the Project Site. Additionally, the Project would be constructed with automatic sprinklers, where required by code. (Draft EIR, p. 4.11.a-6—4.11.a-7.)

Furthermore, the adequacy of existing water pressure and water availability in the Project area will be verified by the LAFD during the plan check review process. Compliance with the Los Angeles Building Code and LAFD standards is mandatory and routinely conditioned upon projects when they are approved. The LAFD will review the development plans in order to ascertain the nature and extent of any additional requirements. The Project Site plan would also be reviewed by the Los Angeles Fire Department to ensure that the Project complies with all emergency access and sight line requirements. The Project, once operational, would be periodically inspected by the Fire Department. **Therefore, the Project would have less than significant impacts**

regarding fire protection, with compliance with applicable codes and recommendations of the LAFD. (Draft EIR, p. 4.11.a-7.)

2. Schools

Threshold: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools?

Finding: Less than significant. (Draft EIR, pp. 4.11.c-9—4.11.c-13.)

Explanation: **Construction**

The Project would involve the development of 185 multi-family residential units. Project construction would result in temporary jobs for construction employees. However, due to the temporary nature of construction jobs and the anticipation that construction workers would not likely relocate their households due to construction job opportunities presented by the Project, construction employment generated by the Project would not result in an increase in the resident population or corresponding demand for schools in the project area. Impacts on school facilities during Project construction would be less than significant. (Draft EIR, p. 4.11.c-9.)

Operation

The Project proposes development of new multi-family residential units. Using the applicable LAUSD student generation rates for multiple family dwelling units, the Project is estimated to generate approximately 78 new students consisting of 42 elementary school students, 12 middle school students, and 24 high school students. (Draft EIR, p. 4.11.c-9.)

When accounting for the removal of the existing on-site apartment units, the Project would result in a net increase of approximately 39 students consisting of 21 elementary school students, six middle school students, and 12 high school students. (Draft EIR, p. 4.11.c-9.)

The number of Project-generated students who could attend LAUSD schools serving the Project Site would likely be less than the above estimate because this analysis does not include LAUSD options that allow students generated by the Proposed Project to enroll at other LAUSD schools located away from their home attendance area, or students who may enroll in private schools or participate in home-schooling. Additionally, this analysis does not account for Project residents who may already reside in the school attendance boundaries and would move to the Project Site. Students generated by the proposed project have additional enrollment options through LAUSD, including but not limited to (LAUSD Enrollment, 2019):

- LAUSD's K-12 open enrollment, which allows students within the LAUSD to apply to any regular, grade-appropriate LAUSD school with designated open enrollment seats;

- Magnet schools and magnet centers, which are open to qualified students in the LAUSD;

- Admission Criteria Schools, which offer specialized programs with additional selection requirements. Boys Academic Leadership Academy, Early College, and University Pathways are accepting applications for students living within and outside of LAUSD boundaries.

- Permits with Transportation is a voluntary integration program that provides students with experiences in integrated school settings.

- Zone of Choice, which allows matriculating 8th grade students living within a Zone of Choice may rank their high school program selections. Zones of Choice are identified as geographic areas comprised of multiple high school options.

(Draft EIR, p. 4.11.c-9—4.11.c-13.)

Existing Enrollment Capacity

Based on existing enrollment and capacity data from LAUSD, Glen Alta Elementary, would not have adequate capacity to accommodate the new students generated by the Project under existing conditions. Specifically, with the addition of Project-generated students, Glen Alta Elementary School would have a seating shortage of 70 seats (i.e., existing seating shortage of 43 in addition to the Project student generation of 27 students). (Draft EIR, p. 4.11.c-13.)

Based on existing enrollment and capacity information from LAUSD, both Woodrow Wilson High School and Abraham Lincoln High School, which are located in the Northeast High School Zone of Choice, are currently overcrowded with a shortage of 673 seats. With the addition of Project-generated students, these two high schools would have a seating shortage of 685 seats (i.e., existing seating shortage of 673 in addition to the Project student generation of 12 students).(Draft EIR, p. 4.11.c-13.)

Future Enrollment Capacity

With regard to projected future capacity, Glen Alta Elementary School would have a seating shortage of 47 students (i.e., future seating shortage of 20 students in addition to the Project student generation of 27 students).(Draft EIR, p. 4.11.c-13.)

Regarding future projected capacity, both Woodrow Wilson High School and Abraham Lincoln High School, which are located in the Northeast High School Zone of Choice, would have a projected enrollment of 2,971,

with a projected seating overage of 244 seats and no projected overcrowding in the future given that only 12 new high school aged students generated by the Project.(Draft EIR, p. 4.11.c-13.)

Pursuant to SB 50, prior to the issuance of a building permit, the project proponent would be required to pay development fees to the LAUSD. Pursuant to Government Code § 65995, the payment of these fees is considered full and complete mitigation of Project-related school impacts. Therefore, payment of the applicable development school fees to the LAUSD would offset the potential impact of additional student enrollment at schools that would serve the Project Site. **Therefore, with adherence to SB 50, project impacts on schools would be less than significant and mitigation measures would not be required**.(Draft EIR, p. 4.11.c-13.)

O. PARKS AND RECREATION

1. Parks

Threshold: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks?

Finding: Less than significant. (Draft EIR, pp. 4.11.d-11—4.11.d-14.)

Explanation: **Project Operation**

The Project would provide 185 units which is anticipated to result in an approximate Project population of 656 residents. This would result in an increase of 85 housing units and 435 more residents, compared to current (January, 2019) conditions, which could increase the demand for park and recreational facilities. (Draft EIR, p. 4.11.d-12.)

The Project would be subject to fees such as school, parks/recreation, library, and sewer impact fees. Where applicable, the Project applicant will apply for exemptions and/or reduced fees. The response to the information request letter sent to the City of Los Angeles Department of Recreation and Parks indicates that the additional population of the Project "could add to a burdened system" (Ford, 2018). In response to what mitigation is recommended for potential Project impacts, the letter states: "We encourage the applicant to link with nearby recreation and park facilities and consider mutually beneficial partnerships between park programs, operations, and improvements" (Ford, 2018). (Draft EIR, p. 4.11.d-12.)

The Project would provide several courtyards, each with a unique design theme and use. Outdoor space adjacent to the community building would offer places for outdoor social gatherings, and special events and

neighborhood celebrations, with shaded areas seating and BBQ grills for outdoor dining. Areas designed for use by children would feature tot lots for use by children from 2 12 years of age. There would be play areas for children, from tot lots to hard surface play, experiential play elements that encourage interaction and group play. The landscape design would create a park like setting for residents. (Draft EIR, p. 4.11.d-12.)

The proposed Project is expected to result in an increase in the number of residents living on the Project Site by approximately 435 people. This increase in the residential population would increase the use of recreational facilities, however, the Project would include common indoor space (lobbies in buildings A and B, and the Community Center), common outdoor space (courtyards and play areas), and private open space (private patios), as well as landscaped area. The Project will comply with Park Fee Ordinance No. 184505 and LAMC §§ 12.21 G, and 12.33 G. (Draft EIR, p. 4.11.d-13.)

The Project increase in population and associated demand on recreational facilities and open space over existing conditions would be small, and the Project's contribution to use of recreational facilities and open space would not require the construction or expansion of recreational facilities that would result in adverse physical effects on the environment. (Draft EIR, p. 4.11.d-13.)

The Project would provide approximately 26,416 sq. ft. or approximately 0.6 acre of common outdoor space, resulting in 0.91 acres per 1,000 residents of common outdoor space. Thus, the Project would not meet the Los Angeles Department of Recreation and Parks' long-range standard of two acres per 1,000 residents for neighborhood parks with a service radius of 0.5 miles and two acres per 1,000 residents for community parks with a service radius of two miles. It should be noted that these standards are Citywide goals and are not intended to be requirements for individual development projects (City of Los Angeles Department of City Planning, 2018a, Public Recreation Plan Element, p. 3). The City's Public Recreation Plan (PRP) provides more attainable short-term/intermediate-range standards of: one acre per 1,000 persons within a one-mile service radius for neighborhood and community parks, or two acres per 1,000 persons within a two-mile radius for community parks (City of Los Angeles Department of City Planning, 2018a, Public Recreation Plan Element, p. 3). However, as stated above, these standards are Citywide goals and are not intended to be requirements for individual development projects (City of Los Angeles Department of City Planning, 2018a, Public Recreation Plan Element, p. 3). When subtracting the private open space square footage from the Project total recreational space, the Project provides approximately 0.79 acres of outdoor/indoor space for an approximate population of 656 persons, which meets the City's standard of one acre per 1,000 persons within a one-mile radius for neighborhood parks. (Draft EIR, p. 4.11.d-13—4.11.d-14.)

Furthermore, the two-mile study area around the Project Site provides access to approximately 4.9 acres of total park and recreation space and 1.7 acres of neighborhood and community park acreage per 1000 people. The Project is located adjacent to Rose Hill Park and the Rose Hill Recreation Center, approximately 0.27 mile from Ernest E. Debs Regional Park, and within a two mile radius of numerous other parks and open space facilities. These facilities would support demand for the Project's residential demand for parks and recreational, in addition to that provided by the proposed onsite recreational facilities and open space. The Project related increase in population and associated demand on parks over existing conditions would be small, and the Project's contribution to park use would not cause substantial degradation of existing facilities or require new or expanded public parks. Additionally, the Project would not conflict with the Community Plan's goal to provide sufficient open space. The Project would be consistent with this goal because the Project would not eliminate existing views in hillside areas and would not remove existing open space resources. (Draft EIR, p. 4.11.d-14.)

The Project will comply with Park Fee Ordinance No. 184505 and LAMC §§ 12.21 G, and 12.33 G. In addition, the Project provides park and recreational spaces onsite. In addition, Project Design Feature Recreation and Parks PDF-1 would implement public involvement and a mutually beneficial partnership between park programs, operations, and improvements in the community. **Therefore, operational impacts related to recreation and parks would be less than significant.** (Draft EIR, p. 4.11.d-14.)

2. Deterioration

Threshold: 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?

Finding: Less than significant. (Draft EIR, pp. 4.11.d-11—4.11.d-14.)

Explanation: **Project Operation**

The Project would provide 185 units which is anticipated to result in an approximate Project population of 656 residents. This would result in an increase of 85 housing units and 435 more residents, compared to current (January, 2019) conditions, which could increase the demand for park and recreational facilities. (Draft EIR, p. 4.11.d-12.)

The Project would be subject to fees such as school, parks/recreation, library, and sewer impact fees. Where applicable, the Project applicant will apply for exemptions and/or reduced fees. The response to the information request letter sent to the City of Los Angeles Department of Recreation and Parks indicates that the additional population of the Project "could add to a burdened system" (Ford, 2018). In response to what mitigation is recommended for potential Project impacts, the letter

states: “We encourage the applicant to link with nearby recreation and park facilities and consider mutually beneficial partnerships between park programs, operations, and improvements” (Ford, 2018). (Draft EIR, p. 4.11.d-12.)

The Project would provide several courtyards, each with a unique design theme and use. Outdoor space adjacent to the community building would offer places for outdoor social gatherings, and special events and neighborhood celebrations, with shaded areas seating and BBQ grills for outdoor dining. Areas designed for use by children would feature tot lots for use by children from 2 12 years of age. There would be play areas for children, from tot lots to hard surface play, experiential play elements that encourage interaction and group play. The landscape design would create a park like setting for residents. (Draft EIR, p. 4.11.d-12.)

The proposed Project is expected to result in an increase in the number of residents living on the Project Site by approximately 435 people. This increase in the residential population would increase the use of recreational facilities, however, the Project would include common indoor space (lobbies in buildings A and B, and the Community Center), common outdoor space (courtyards and play areas), and private open space (private patios), as well as landscaped area as detailed in the Table 4.11.d-3 below. The Project will comply with Park Fee Ordinance No. 184505 and LAMC §§ 12.21 G, and 12.33 G. (Draft EIR, p. 4.11.d-13.)

The Project increase in population and associated demand on recreational facilities and open space over existing conditions would be small, and the Project’s contribution to use of recreational facilities and open space would not require the construction or expansion of recreational facilities that would result in adverse physical effects on the environment. (Draft EIR, p. 4.11.d-13.)

The Project would provide approximately 26,416 sq. ft. or approximately 0.6 acre of common outdoor space, resulting in 0.91 acres per 1,000 residents of common outdoor space. Thus, the Project would not meet the Los Angeles Department of Recreation and Parks’ long-range standard of two acres per 1,000 residents for neighborhood parks with a service radius of 0.5 miles and two acres per 1,000 residents for community parks with a service radius of two miles. It should be noted that these standards are Citywide goals and are not intended to be requirements for individual development projects (City of Los Angeles Department of City Planning, 2018a, Public Recreation Plan Element, p. 3). The City’s Public Recreation Plan (PRP) provides more attainable short-term/intermediate-range standards of: one acre per 1,000 persons within a one-mile service radius for neighborhood and community parks, or two acres per 1,000 persons within a two-mile radius for community parks (City of Los Angeles Department of City Planning, 2018a, Public Recreation Plan Element, p. 3). However, as stated above, these standards are Citywide goals and are not intended to be requirements for individual development projects (City of Los Angeles Department of City

Planning, 2018a, Public Recreation Plan Element, p. 3). When subtracting the private open space square footage from the Project total recreational space, the Project provides approximately 0.79 acres of outdoor/indoor space for an approximate population of 656 persons, which meets the City's standard of one acre per 1,000 persons within a one-mile radius for neighborhood parks. (Draft EIR, p. 4.11.d-13—4.11.d-14.)

Furthermore, the two-mile study area around the Project Site provides access to approximately 4.9 acres of total park and recreation space and 1.7 acres of neighborhood and community park acreage per 1000 people. The Project is located adjacent to Rose Hill Park and the Rose Hill Recreation Center, approximately 0.27 mile from Ernest E. Debs Regional Park, and within a two mile radius of numerous other parks and open space facilities. These facilities would support demand for the Project's residential demand for parks and recreational, in addition to that provided by the proposed onsite recreational facilities and open space. The Project related increase in population and associated demand on parks over existing conditions would be small, and the Project's contribution to park use would not cause substantial degradation of existing facilities or require new or expanded public parks. Additionally, the Project would not conflict with the Community Plan's goal to provide sufficient open space. The Project would be consistent with this goal because the Project would not eliminate existing views in hillside areas and would not remove existing open space resources. (Draft EIR, p. 4.11.d-14.)

As discussed above, the Project will comply with Park Fee Ordinance No. 184505 and LAMC §§ 12.21 G, and 12.33 G. In addition, the Project provides park and recreational spaces onsite. In addition, Project Design Feature Recreation and Parks PDF-1 would implement public involvement and a mutually beneficial partnership between park programs, operations, and improvements in the community. **Therefore, operational impacts related to recreation and parks would be less than significant.** (Draft EIR, p. 4.11.d-14.)

3. Construction of New Facilities

Threshold: Would the Project include recreational facilities or require the construction or expansion of recreational facilities which have an adverse physical effect on the environment?

Finding: Less than significant. (Draft EIR, pp. 4.11.d-11—4.11.d-14.)

Explanation: **Project Operation**

The Project would provide 185 units which is anticipated to result in an approximate Project population of 656 residents. This would result in an increase of 85 housing units and 435 more residents, compared to current (January, 2019) conditions, which could increase the demand for park and recreational facilities. (Draft EIR, p. 4.11.d-12.)

The Project would be subject to fees such as school, parks/recreation, library, and sewer impact fees. Where applicable, the Project applicant will apply for exemptions and/or reduced fees. The response to the information request letter sent to the City of Los Angeles Department of Recreation and Parks (refer to Appendix N3 of the Draft EIR) indicates that the additional population of the Project "could add to a burdened system" (Ford, 2018). In response to what mitigation is recommended for potential Project impacts, the letter states: "We encourage the applicant to link with nearby recreation and park facilities and consider mutually beneficial partnerships between park programs, operations, and improvements" (Ford, 2018). (Draft EIR, p. 4.11.d-12.)

The Project would provide several courtyards, each with a unique design theme and use. Outdoor space adjacent to the community building would offer places for outdoor social gatherings, and special events and neighborhood celebrations, with shaded areas seating and BBQ grills for outdoor dining. Areas designed for use by children would feature tot lots for use by children from 2 12 years of age. There would be play areas for children, from tot lots to hard surface play, experiential play elements that encourage interaction and group play. The landscape design would create a park like setting for residents. (Draft EIR, p. 4.11.d-12.)

The proposed Project is expected to result in an increase in the number of residents living on the Project Site by approximately 435 people. This increase in the residential population would increase the use of recreational facilities, however, the Project would include common indoor space (lobbies in buildings A and B, and the Community Center), common outdoor space (courtyards and play areas), and private open space (private patios), as well as landscaped area. The Project will comply with Park Fee Ordinance No. 184505 and LAMC §§ 12.21 G, and 12.33 G. (Draft EIR, p. 4.11.d-13.)

The Project increase in population and associated demand on recreational facilities and open space over existing conditions would be small, and the Project's contribution to use of recreational facilities and open space would not require the construction or expansion of recreational facilities that would result in adverse physical effects on the environment. (Draft EIR, p. 4.11.d-13.)

The Project would provide approximately 26,416 sq. ft. or approximately 0.6 acre of common outdoor space, resulting in 0.91 acres per 1,000 residents of common outdoor space. Thus, the Project would not meet the Los Angeles Department of Recreation and Parks' long-range standard of two acres per 1,000 residents for neighborhood parks with a service radius of 0.5 miles and two acres per 1,000 residents for community parks with a service radius of two miles. It should be noted that these standards are Citywide goals and are not intended to be requirements for individual development projects (City of Los Angeles Department of City Planning, 2018a, Public Recreation Plan Element, p. 3). The City's Public Recreation Plan (PRP) provides more attainable short-term/intermediate-range standards of: one acre per 1,000 persons

within a one-mile service radius for neighborhood and community parks, or two acres per 1,000 persons within a two-mile radius for community parks (City of Los Angeles Department of City Planning, 2018a, Public Recreation Plan Element, p. 3). However, as stated above, these standards are Citywide goals and are not intended to be requirements for individual development projects (City of Los Angeles Department of City Planning, 2018a, Public Recreation Plan Element, p. 3). When subtracting the private open space square footage from the Project total recreational space, the Project provides approximately 0.79 acres of outdoor/indoor space for an approximate population of 656 persons, which meets the City's standard of one acre per 1,000 persons within a one-mile radius for neighborhood parks. (Draft EIR, p. 4.11.d-13—4.11.d-14.)

Furthermore, the two-mile study area around the Project Site provides access to approximately 4.9 acres of total park and recreation space and 1.7 acres of neighborhood and community park acreage per 1000 people. The Project is located adjacent to Rose Hill Park and the Rose Hill Recreation Center, approximately 0.27 mile from Ernest E. Debs Regional Park, and within a two mile radius of numerous other parks and open space facilities. These facilities would support demand for the Project's residential demand for parks and recreational, in addition to that provided by the proposed onsite recreational facilities and open space. The Project related increase in population and associated demand on parks over existing conditions would be small, and the Project's contribution to park use would not cause substantial degradation of existing facilities or require new or expanded public parks. Additionally, the Project would not conflict with the Community Plan's goal to provide sufficient open space. The Project would be consistent with this goal because the Project would not eliminate existing views in hillside areas and would not remove existing open space resources. (Draft EIR, p. 4.11.d-14.)

The Project will comply with Park Fee Ordinance No. 184505 and LAMC §§ 12.21 G, and 12.33 G. In addition, the Project provides park and recreational spaces onsite. In addition, Project Design Feature Recreation and Parks PDF-1 would implement public involvement and a mutually beneficial partnership between park programs, operations, and improvements in the community. **Therefore, operational impacts related to recreation and parks would be less than significant.** (Draft EIR, p. 4.11.d-14.)

4. Libraries

Threshold: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for libraries?

Finding: Less than significant. (Draft EIR, pp. 4.11.e-4—4.11.e-6.)

Explanation: **Project Construction**

Construction of the Project would result in construction jobs and therefore, construction workers on the Project Site. However, construction jobs created by the Project would not result in substantial population growth in the Project area because construction jobs are temporary in nature. It is anticipated that persons filling construction jobs would be from the local area and as such, construction workers would not move or relocate to the Project area during Project construction. Therefore, Project related construction workers would not result in an increase in the population within the service area of the three libraries (i.e., Arroyo Seco Regional, El Sereno and Lincoln Heights branch libraries) located within two miles of the Project Site. Additionally, construction workers are likely to use library facilities near their place of residence. It is highly unlikely that the construction workers would use the libraries in the Project vicinity during lunch hours or before the start of their work day or after the end of their work day. Therefore, any increase in the use of library facilities during the construction phase of the Project would be temporary and negligible. (Draft EIR, p. 4.11.e-4—4.11.e-5.)

During Phase I of Project construction, fewer persons would be living at the Project Site, compared to existing conditions; however, no impact on library facilities would occur during either Phase I or II of Project construction. (Draft EIR, p. 4.11.e-5.)

Therefore, construction of the Project would not result in the need for new or expanded library facilities and project construction would result in less than significant impacts on library facilities. (Draft EIR, p. 4.11.e-5.)

Project Operation

The Project would develop 89 units in the first phase of development and 96 units in the second phase of development, resulting in a total of 185 units with an anticipated total population of 656 residents, of which there would be 435 more residents, compared to January 2019 conditions. These residents could generate an increased demand for library facilities and services from libraries in the Project area. In response to the information request letter sent to the Los Angeles Public Library (Refer to Appendix N4), Ms. Aurial Granger provided a letter which states: "…any increase in the residential and/or commuter adjusted population that is in close proximity to a library has a direct impact on library services with increased demands for library staffing, materials, computers, and information services. Therefore, mitigation measures may be necessary in order to lessen the impact on these services to a level that is appropriate for a given service population in accordance to the February 8, 2007 Board of Library Commissioners approved Branch Facilities Plan."(Draft EIR, p. 4.11.e-5.)

As described above in Section 4.11.e.2 above, the LAPL Facilities Plan includes criteria for new Libraries, which recommends new size standards for the provision of LAPL facilities – 12,500 square feet for a community with less than 45,000 population and 14,500 square feet for a community with more than 45,000 populations. It also recommends that when a community reaches a population of 90,000, an additional branch library should be considered for the area. (Draft EIR, p. 4.11.e-5.)

The two branch libraries and the regional branch library are all relatively close to the Project Site. The nearest library, the El Sereno Branch Library, is 10,500 square feet in size. While smaller than the 12,500 square foot size standard recommended in the LAPL Branch Facilities Plan, this library is operating at below the design capacity criterion for this facility at less than 45,000 while the current service population of this facility is 23,254. Assuming that all of the Project's 435 net new residents would utilize the El Sereno Branch Library rather than being distributed among all three nearby libraries, the service population of the El Sereno Branch would increase to 23,689. This would still be below the design capacity criterion for this facility and would not trigger the LAPL Branch Facilities Plan threshold (e.g., a service population of 90,000) for requiring a new branch library. (Draft EIR, p. 4.11.e-5.)

Furthermore, new development generates tax revenues for the City, a portion of which goes to fund City library facilities and services. Also, while LAPL recommends an ad hoc fee of $200 per capita for the population associated with new development be used for staff, books, computers, and other library materials (Granger, 2018 and Appendix N4), none of the per capita ad hoc fees requested by LAPL would be applied to the provision of new or physically altered facilities, the construction of which would cause significant environmental effects. Regarding public services, CEQA asks "Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, construction of which could cause significant environmental impacts." As discussed above, the Project's projected population would not exceed the design capacity criterion for LAPL, and as such, would not require a new branch library to be built. (Draft EIR, p. 4.11.e-5—4.11.e-6.)

While it is likely that closest LAPL branches currently serving the Project Site would be used by the future residents, it is not expected that any one library or branch would be the focus of the demand. **The Project increase in population and associated demand on existing libraries over existing conditions would be small, and the Project's contribution to library use would not cause substantial degradation of existing facilities or require new or expanded libraries. Impacts related to libraries would be less than significant.** (Draft EIR, p. 4.11.e-6.)

P. TRANSPORTATION / TRAFFIC

1. Plans, Policies, and Ordinances

Threshold: Would the Project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Finding: Less than significant. (Draft EIR, pp. 4.12-25—4.12-30.)

Explanation: **Existing With Project Conditions**

This section describes existing traffic conditions at the signalized study intersections with the addition of project generated traffic. Traffic volumes for these conditions were derived by adding Project trips to the existing traffic volumes. Since the Project will involve closing Victorine at McKenzie Avenue, observed westbound trips at the intersection of McKenzie Avenue and Browne Avenue were diverted to adjacent intersections as part of this scenario (KOA, 2019, p. 17). All of the study intersections would continue to operate at LOS D or better during both AM and PM peak hours (KOA, 2019, p. 17). (Draft EIR, p. 4.12-25.)

Project Traffic Impacts – Existing With Project Conditions

Traffic impacts created by the Project were determined by comparing the existing scenario conditions to the Existing With Project scenario conditions. As shown in Table 9 in KOA's traffic report, **the Project would not create significant traffic impacts at any of the study intersections under Existing With Project conditions. Therefore, mitigation measures are not recommended under this scenario** (KOA, 2019, pp. 26 27). (Draft EIR, p. 4.12-25.)

Future With-Project Conditions

This section describes future traffic conditions at the signalized study intersections with the addition of project generated traffic. Traffic volumes for these conditions were derived by adding Project trips to the future Without Project scenario volumes. Table 10 in KOA's traffic report summarizes the V/C and LOS values at the study intersections under this scenario. The intersection of Monterey Road and Huntington Drive would continue to operate at LOS E during the AM peak hour. (Draft EIR, p. 4.12-26.)

Project Traffic Impacts – Future With Project Conditions

Table 4.12 9 provides a summary of Project impacts under future conditions. Traffic impacts created by the Project were determined by comparing the Future Pre Project conditions to the Future With Project (post-project) conditions. (Draft EIR, p. 4.12-26.)

Under future with-Project conditions, the proposed Project would not create any significant traffic impacts at the study intersections.

Therefore, mitigation measures are not recommended under the future period (KOA, 2019, p. 27). (Draft EIR, p. 4.12-26.)

Neighborhood Intersections

The four intersections included in KOA's traffic study for the examination of potential neighborhood traffic impacts of the Project are either adjacent to the Project Site, or on the route between the site and the nearest arterial. These intersections were analyzed in generally the same manner as the primary study intersections, but these locations are not controlled by traffic signals but by stop signs on the minor approaches. The Highway Capacity Manual unsignalized method was applied, and traffic counts, ambient background growth, area/cumulative project trips, and Project trips were applied in the same manner (KOA, 2019, p. 28). (Draft EIR, p. 4.12-25.)

Table 11 in KOA's traffic report for the proposed Project summarizes the analysis of the included neighborhood intersections. For post-Project conditions, projected westbound trips at the intersection of McKenzie Avenue and Browne Avenue were diverted to adjacent intersections in order to account for the planned closure of Victorine (KOA, 2019, p. 28). (Draft EIR, p. 4.12-25—4.12-26.)

The delay values in the table are based on average vehicle delay at the minor approaches at the partially-controlled intersection of Huntington Drive North and Mercury Avenue and on average vehicle delay at all approaches for the all-way stop control configurations at the other three intersections (KOA, 2019, p. 28). (Draft EIR, p. 4.12-26.)

As the vehicle delay at these intersections does not reach LOS E or F in the future without- Project or future with-Project periods, additional signal warrant analysis was not conducted. No further analysis of these intersections is necessary (KOA, 2019, p. 29). (Draft EIR, p. 4.12-26.)

Public Transit Service

Public transit services in the vicinity of the Project Site are provided by Metro. As seen in Table 4.12 1 of the Draft EIR, Metro bus Lines 78, 79, 378, 252, and 256 operate in the Project area. Metro Line 252 is located adjacent to the Project Site, along Mercury Avenue, with bus stops near the intersections of Mercury Avenue and McKenzie Avenue and Mercury Avenue and Boundary Avenue (Google Earth Pro, 2018). The existing bus stop at the northeast corner of the intersection of Boundary Avenue and Mercury Avenue is anticipated to be protected during Project construction. (Draft EIR, p. 4.12-26.)

All bus stops in the Project vicinity are for Metro Line 252. (Draft EIR, p. 4.12-27.)

Public Transit Service-During Project Operation

The Project proposes 174 parking spaces and is estimated to result in a net increase of 435 people, compared to existing conditions. As detailed above, five different bus lines operate in the Project area, with Metro Line 252 located adjacent to the Project Site. (Draft EIR, p. 4.12-27.)

Metro Line 252 runs Monday- Friday in the north bound and south bound direction starting at 4:20 a.m. and runs until 9:15 p.m. for the Huntington and Monterey bus stop, near the Project Site. During the weekdays this bus line along stops at the Huntington and Monterey stop 35 times in the north bound direction and 31 times in the southbound direction (Metro Line 252 Schedule, 2019). (Draft EIR, p. 4.12-27.)

The line runs on Saturday in the north bound and south bound direction starting at 5:44 a.m. and runs until 9:15 p.m. for the Huntington and Monterey bus stop, near the Project Site. On Saturdays this bus line along stops at the Huntington and Monterey stop 22 times in the north bound and 22 times in the south bound direction. (Metro Line 252 Schedule, 2019). (Draft EIR, p. 4.12-27.)

The line runs on Sundays and Holidays in the north bound and south bound direction starting at 5:47 a.m. and runs until 9:15 p.m. for the Huntington and Monterey bus stop, near the Project Site. On Sundays and holidays this bus line along stops at the Huntington and Monterey stop 22 times in the northbound direction and 22 times in the southbound direction (Metro Line 252 Schedule, 2019). (Draft EIR, p. 4.12-27—4.12-28.)

In total, Metro Line 252, which is only one of the five bus lines to operate in the Project area, stops 66 times at the Huntington and Monterey stop Monday-Friday and 44 times a day on Saturdays, Sundays, and holidays. Due to the numerous stops this line makes, in addition to the stops that the other four lines in the Project vicinity make, the addition of approximately 435 people would not create a significant increase in transit demand because the persons from the Project Site using the Metro bus lines would utilize multiple bus lines and a variety of different hours, which would distribute the demand on the bus line such that not all 435 people would need to use the nearest bus stop at any one time. (Draft EIR, p. 4.12-28.)

The Project also proposes alternative transportation by providing long-term and short-term bicycle parking, as described earlier in this section. Therefore, based on the above, **operation of the Project would not affect the transit route or bus facilities, and not conflict with any plans or policies related to these travel modes. After Project construction is complete, the Project would not conflict with existing policies, plans, or programs supporting alternative transportation.** (Draft EIR, p. 4.12-28.)

Parking

Although CEQA Appendix G does not have a threshold for parking impacts, in response to comments during the public scoping period, a discussion of potential parking impacts is included in this section. (Draft EIR, p. 4.12-28.)

Project Operation Parking

Under existing conditions, the Rose Hill Courts development has 80 spaces onsite along Victorine for the existing 100 units. For onsite parking this equates to approximately 0.80 parking space per unit. Each new building would have dedicated parking. The Project proposes a total of 174 parking spaces and 185 dwelling units. For onsite parking, this equates to approximately 0.94 parking space per unit.Phase I will construct 55 parking spaces and 89 units, which equates to approximately 0.62 parking space per unit. Phase II will have 119 spaces and 96 units, which equates to 1.24 parking spaces per unit. (Draft EIR, p. 4.12-28.)

It is estimated that under existing conditions there are between 230 and 261 parking spaces (including onsite and offsite parking) and under the proposed Project there would be between 315 and 344 parking spaces (including onsite and offsite parking).The applicable LAMC § 12.21 A.4 parking space requirements for apartment land uses are: 2.0 parking spaces for dwelling units with more than three habitable rooms; 1.5 parking spaces for dwelling units with three habitable rooms; 1.0 parking space for dwelling units with less than three habitable rooms (City of LA Municipal Code, 2018). Per LAMC § 12.21, General Provisions, § 12.21A, the Project is allowed a 30% reduction in required parking spaces. The proposed Project will increase the number of onsite parking spaces per unit from 0.80 parking spaces per unit to 0.94 parking spaces per unit, which will be an increase of 0.14 parking spaces per unit available onsite. Furthermore, **the proposed Project would increase the total number of onsite parking spaces available. There would be a net increase of 94 parking spaces. Since the number of onsite parking spaces per unit will increase after construction, which is a beneficial impact, the proposed Project would have no adverse impacts to parking during operation.** (Draft EIR, p. 4.12-29.)

2. VMT

Threshold: Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Finding: Less than significant. (Draft EIR, p. 4.12-30.)

Explanation: Section 15064.3, Determining the Significance of Transportation Impacts, of the CEQA Guidelines describes specific considerations for evaluating a project's transportation impacts. Section 15064.3, subdivision (b) includes criteria for analyzing transportation impacts. For land use projects, "Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within 0.5 mile of

either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact" (CEQA Guidelines § 15064.3). (Draft EIR, p. 4.12-30.)

The analysis provided in the traffic report prepared for the Project utilizes volume to capacity ratios and level of service standards to determine Project significance because the requirement to use vehicle miles traveled was not mandatory at the time the traffic report was written. However, Draft EIR, Section 4.15, Energy, discusses vehicles miles traveled (VMT) during both the construction and operational phases. Onroad VMT for each construction subphase and each of the three trip types were calculated from results of the CalEEMod modeling. As detailed in Table 4.15 2 of the Draft EIR, total VMT are projected to increase by about 1,181,329 vehicle-miles per year. However, VMT per capita are projected to decrease substantially as result of the project. Per capita VMT will be about 37% lower. As a result, per-capita consumption of gasoline and diesel fuels will decrease by a comparable amount. Refer to Section 4.15 for details. **Because the Project is located within a high-quality transit corridor and public transportation would still be available to the residences at the site, impacts to transportation based on vehicle miles traveled are expected to be less than significant**. (Draft EIR, p. 4.12-30.)

3. Congestion Management Programs

Threshold: 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?

Finding: Less than significant. (Draft EIR, p. 4.12-31.)

Explanation: The nearest Congestion Management Program (CMP) arterial monitoring intersection is approximately 1.8 miles from the Project Site, located at the intersection of the northbound I-710 freeway off-ramp and Valley Boulevard (KOA, 2019, p. 30). Based on the trip generation defined in Table 4.12-8 of Draft EIR, it is not expected that 50 or more new Project trips per hour would be added at this CMP intersection. Therefore, no further analysis of potential CMP impacts is required. (Draft EIR, p. 4.12-31.)

The nearest freeway monitoring station is located on the SR-110 freeway, at Pasadena Avenue, which is about 1.2 miles from the Project Site (KOA, 2019, p. 30). Based on the trip generation defined in Table 4.12-8 of the Draft EIR, the Project is not expected to add more than 150 trips at this location. Therefore, no further analysis of potential CMP impacts is required. (Draft EIR, p. 4.12-31.)

Metro Bus Line 252 has stops on Mercury Avenue, at the south side of the Project Site. Metro Bus Line 256 has stops in the vicinity of the Monterey Road/Huntington Drive intersection, at an approximate 1,200-foot walking distance (or approximately one-quarter of a mile) from the Project Site. The Metro bus service on Huntington Drive, provided by joint local and limited-service line 78/79/378, is the closest CMP transit route as designated by Metro to the site (KOA, 2019, p. 30-31). (Draft EIR, p. 4.12-31.)

The Project trip generation without trip generation credits is 762 daily trips, including 93 vehicle trips during the AM peak hour and 63 vehicle trips during the PM peak hour. The Project trip generation was adjusted by values defined by the CMP to calculate estimated transit trips. The CMP defines transit mode splits for developments located near or adjacent to a CMP transit corridor, which is defined by stops on a CMP transit line. For residential developments, this rate is defined at 5 percent (KOA, 2019, p. 31). (Draft EIR, p. 4.12-31.)

The following calculations were made, based on the defined CMP methodology:

- Project person trips (1.4 times vehicle trips) would be 1,067 on a daily basis, including 130 trips in the AM peak hour and 88 trips in the PM peak hour.

- Applying a five percent mode split for residential uses near CMP transit to the person trips, the Project transit trips would be 53 daily trips, including seven trips in the AM peak hour and four trips in the PM peak hour.

It is anticipated that the existing transit service in the Project area would be able to accommodate the Project generated transit trips, based on the multiple transit lines available in the area and the low overall transit trip demand of seven or fewer peak-hour trips anticipated for the proposed project. **Therefore, given the number of transit trips generated by the Project and the existing transit routes in the Project vicinity, it is concluded that the existing public transit system would not be significantly impacted by the proposed Project** (KOA, 2019, p. 31). (Draft EIR, p. 4.12-32.)

4. Design Feature Hazards

Threshold: Does the Project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Finding: No impact. (Draft EIR, p. 4.12-32.)

Explanation: Access to the Project Site would be provided via two driveways along Mercury Avenue, one driveway along Mackenzie Avenue, and three driveways along Florizel Street. The Project would comply with all

applicable requirements of the City of Los Angeles regarding traffic-related design features and would be designed to provide adequate lines of sight, proper emergency access, and vehicle flow within the Project Site. **Therefore, the Project would not increase hazards due to a design feature, and no impact would occur**. (Draft EIR, p. 4.12-32.)

5. Emergency Access

Threshold: Does the Project result in inadequate emergency access?

Finding: No impact. (Draft EIR, p. 4.12-32.)

Explanation: **Emergency Access – Project Operation**

The Project site plan will be reviewed by the Los Angeles Fire Department and the Project complies with all emergency access and sight line requirements. **Therefore, the Project would not result in inadequate emergency access during operation and no impacts would occur.** (Draft EIR, p. 4.12-32.)

Q. TRIBAL CULTURAL RESOURCES

1. Tribal Cultural Resources

Threshold: 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:

- 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 section 5020.1(k), or
- 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 section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe?

Finding: Less than significant. (Draft EIR, pp. 4.13-10—4.13-12.)

Explanation: **Direct Impacts**

Previous cultural resources surveys within the half mile buffer zone resulted in no archaeological sites or isolates or tribal cultural resources being recorded and no prehistoric or historic archaeological resources or tribal cultural resources were observed during the pedestrian field survey. The fully built environment of the project site and elevation relative to

adjacent roads suggests that ground here has been significantly cut and filled, with no original surface soil remaining. There were no cultural resources identified, as defined by PRC § 21074. Additionally, the site has not been recommended for historic designation for prehistoric and TCRs. Outreach to local tribal organizations for the Cultural Resources Inventory report resulted in requests from both the Gabrielino Band of Mission Indians – Kizh Nation and the Gabrieleno/Tongva San Gabriel Band of Mission Indians to have a tribal monitor supplement the archeological monitor during ground disturbing construction activity. The Gabrieleno Kizh Nation and the San Gabriel Band believe the project lies in a sensitive area regarded as the ancestral and traditional territories of both tribes. No traditional cultural sites were documented in the NAHC's SLF search. (Draft EIR, p. 4.13-10.)

Based on the Phase I Cultural Resources Phase I Survey report which includes a records search at the CHRIS Southern Central Coastal Information Center of survey reports and site records, the pedestrian site survey, results of the SLF search by the NAHC, information provided by Gabrieleño Kizh Nation, as well as the fact there was extensive construction on the project site during the 1940s, the probability for significant impacts to TCRs is low at the Project site. Given the presence of Native Americans in the Americas for more than 12,000 years, and in particular Southern California, HACLA recognizes it is likely that there would have been prehistoric people in the general vicinity of the project area for many generations. While the precise location of the village of Otsungna is unknown, it was likely located somewhere in a wide space along the canyon connecting Mission San Gabriel with old downtown Los Angeles, which now contains Mission Road, at the eastern edge of El Sereno and northwest of the CSU Los Angeles campus. This location is approximately 1.5 to 2.25 miles southwest of the Rose Hill Courts Project site. **Therefore, impacts to TCRs would be less than significant.** (Draft EIR, pp. 4.13-10—4.13-11.)

Nonetheless, in an effort to cooperate with Gabrieleno Kizh Nation, the project will be subject to the following condition of approval as an additional means of protection for the inadvertent discovery of TCRs:

Condition of Approval – Tribal Cultural Resource Inadvertent Discovery (TCR-COA-1)

The process for addressing inadvertent discoveries of objects or artifacts that may be tribal cultural resources during construction of the Rose Hill Courts Redevelopment Project is as follows:

- Prior to commencement of any ground disturbing activities, the Project contractor (including construction workers and foreman) will receive Workers Environmental Awareness Program ("WEAP") training that: a) describes and illustrates potential regional cultural resources; b) emphasizes cultural sensitivity regarding the continued presence of local Native Americans and their concerns; and c) describes legal and regulatory requirements for the preservation of tribal cultural resources and the responsibility of the contractor to comply with these

requirements. "Ground disturbing" activities will include the following: foundation demolition and removal, excavation, grading, utilities installation, foundation work, pile driving (foundation, shoring, etc.). The training will instruct the workers on how to recognize potential tribal cultural resources if inadvertently discovered and promptly report them to their immediate supervisors. The foreman will receive training on when and how to contact HACLA concerning any potential tribal cultural resource finds.

- The WEAP training will be conducted by a Registered Professional Archaeologist retained by HACLA and paid for by the developer. At least three calendar days prior to the WEAP training, HACLA will notify the Gabrieleño Band of Mission Indians – Kizh Nation of the WEAP training via electronic correspondence to the address provided by the tribe and invite the tribe to have a qualified Native American Monitor present during the WEAP training. The Native American Monitor, if present, will be retained by HACLA and paid for by the developer at a reasonable hourly rate agreed upon by the parties.

- At least three calendar days prior to ground disturbing activities, HACLA shall notify the Gabrieleño Band of Mission Indians – Kizh Nation of the planned activities via electronic correspondence to the address provided by the tribe. A Native American Monitor designated by the Gabrieleño Band of Mission Indians – Kizh Nation shall be allowed to be present on-site with the Archaeological Monitor (both of whom are to be retained by HACLA and paid for by the developer) during ground disturbing activities. The Native American Monitor shall confirm whether he/she intends to be present at least twenty-four hours prior to the commencement of the planned activities noticed by HACLA and will be compensated at a reasonable hourly rate only for time spent monitoring the planned activities noticed by HACLA. The absence of the Native American Monitor shall not preclude any planned activities from proceeding.

- The Archaeological Monitor and the Native American Monitor under the supervision of the Project Archaeologist (a Registered Professional Archaeologist) shall be present according to a schedule agreed upon by the Project Archaeologist, until the Project Archaeologist determines that ground disturbing activities are no longer occurring.

- Upon discovery of a potential tribal cultural resource, the developer will immediately stop all ground disturbing activities in the area of the find, defined as a radius of no more than 10 feet, and contact the following: (1) all California Native American tribes that have informed the City of Los Angeles Department of City Planning they are traditionally and culturally affiliated with the geographic area of the proposed project and (2) HACLA at (213) 252-6120.

- If HACLA, in consultation with the Project Archaeologist and the Native American Monitor, determines pursuant to Public Resources

Code section 21074(a)(2) that the object or artifact appears to be a tribal cultural resource, HACLA will provide any affected tribe a reasonable period of time, up to 15 calendar days after notification, to conduct a site visit and make recommendations to the developer and HACLA regarding the monitoring of future ground disturbing activities, as well as treatment and disposition of any discovered tribal cultural resources.

- The developer will implement the affected tribe's recommendations if the Project Archaeologist, in their professional opinion, concludes that the affected tribe's recommendations are reasonable and feasible.

- The developer will submit a cultural resources monitoring plan (CRMP) prepared by the Project Archaeologist to HACLA that includes all recommendations from HACLA and any affected tribes that have been reviewed and determined by the Project Archaeologist to be reasonable and feasible. The developer will not be allowed to recommence ground disturbing activities in the find area until this plan is approved by HACLA.

- If the developer does not accept a particular recommendation determined to be reasonable and feasible by the Project Archaeologist, the developer may request mediation by a mediator agreed to by the developer and HACLA who has the requisite professional qualifications and experience to mediate such a dispute. The developer will pay any costs associated with the mediation.

- While the find assessment and CRMP are being prepared, the developer may recommence ground disturbing activities outside of a specific radius of the tribal cultural resource discovery site, so long as this radius has been reviewed by the Project Archaeologist and determined to be reasonable and appropriate.

- Copies of any subsequent cultural resource report (a study as provided for in the CRMP containing analysis and report on any finds), tribal cultural resources study or report detailing the nature of any tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources will be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton within 60 calendar days following the conclusion of the monitoring by the Project Archaeologist (or within the time period established in the CRMP based on the nature of any discoveries of potential tribal cultural resources).

- Notwithstanding the above, any information determined to be confidential in nature, by HACLA, will be excluded from submission to the SCCIC or the general public under the applicable provisions of the California Public Records Act and/or the California Public Resources Code.

(Draft EIR, p. 4.13-13.)

R. UTILITIES AND SERVICE SYSTEMS

1. RWQCB Requirements

Threshold: Would the Project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board (RWQCB)?

Finding: Less than significant. (IS, p. 4.18-1—4.18-2.)

Explanation: 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). (IS, p. 4.18-1—4.18-2.)

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**. (IS, p. 4.18-2.)

2. Water Supplies

Threshold: 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?

Finding: Less than significant. (IS, p. 4.18-2—4.18-3.)

Explanation: 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. (IS, p. 4.18-2.)

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). (IS, p. 4.18-2.)

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). (IS, p. 4.18-2.)

The project proposes 191 units, including one, two, three, and four-bedroom units. 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. (IS, p. 4.18-2.)

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. (IS, p. 4.18-3.)**Thus, the project will have less than a significant impact.**

3. Wastewater Capacity

Threshold: 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?

Finding: Less than significant. (IS, p. 4.18-3.)

Explanation: The City's storm drain 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. (IS, p. 4.18-.3)

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.) (IS, p. 4.18-4.)

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**. (IS, p. 4.18-4.)

4. Water Supplies

Threshold: Would the Project have sufficient water supplies available to serve the Project from existing entitlements and resources, or are new or expanded entitlements needed?

Finding: Less than significant. (IS, p. 4.18-4.)

Explanation: 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. (IS, p. 4.18-4.)

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.). (IS, p. 4.18-4.)

The project site is developed with a public housing complex containing 100 multi-family units. Table 4.18-2 of the Initial Study displays the estimated increase in potable water demand as a result of the project. 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. (IS, p. 4.18-4.)

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. (IS, p. 4.18-5.)

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 percent5 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. (IS, p. 4.18-5.)

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 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. (IS, pp. 4.18-5—4.18-6.)

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**. (IS, p. 4.18-6.)

5. Wastewater Capacity

Threshold: 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?

Finding: Less than significant impact. (IS, p. 4.18-6.)

Explanation: 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. 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**. (IS, p. 4.18-6.)

6. Solid Waste

Threshold: Would the Project be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs?

Finding: Less than significant. (IS, p. 4.18-6)

Explanation: 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). (IS, p. 4.18-6.)

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 63,4006 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). (IS, p. 4.18-7.)

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). (IS, p. 4.18-7.)

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, of the Initial Study, provides an estimated generation rate of 127 pounds per square foot for multi-family demolition waste (EPA, 2003, p. 13). (IS, p. 4.18-7.)

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.** (IS, p. 4.18-7.)

Table 4.18-3 of the Draft EIR shows the estimated amount of waste to be generated from demolition of the existing Rose Hill Courts and construction of the project. It is anticipated that demolition and construction for the project would generate approximately 4,567 tons of debris. (IS, p. 4.18-7.)

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. (IS, p. 4.18-8.)

The project would increase the number of housing units and population at the project site. 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). 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.** (IS, pp. 4.18-8—4.18-9.)

7. Solid Waste Laws

Threshold: Will the Project comply with federal, state, and local statutes and regulations related to solid waste?

Finding: Less than significant. (IS, p. 4.18-9.)

Explanation: 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). (IS, p. 4.18-9.)

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). (IS, p. 4.18-9.)

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). (IS, p. 4.18-9.)

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.** (IS, p. 4.18-9.)

S. WILDFIRE

1. Response Plans

Threshold: Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?

Finding: Less than significant. (Draft EIR, 4.14-10—4.14-12.)

Explanation: Review of Los Angeles County Disaster Routes Map for the City of Los Angeles (Los Angeles County Department of Public Works, 2013) shows that the project site is not directly accessed by a road designated as a disaster route. However, a portion of Huntington Drive, located within 1,000 feet southeast of the project site, is a designated disaster route. (Draft EIR, p. 4.14-10.)

Project Construction

Construction activities for the project would be primarily confined to the project site and would only include minor offsite improvements in the public right of way for utilities such as water, sewer, and electricity. These offsite improvements would be limited to only the public right of way in the streets surrounding the project site; Florizel Street, Boundary Avenue, McKenzie Avenue, and Mercury Avenue. (Draft EIR, p. 4.14-10.)

In addition, a Construction Management Plan will be implemented during construction of the project to ensure that adequate and safe access remains available within and near the project site during construction activities. The Construction Management Plan will detail how parking will be managed during Phase I and Phase II of project construction. The parking management plan will specify where onsite and offsite parking will be available during both phases of project construction. The Construction Management Plan will include a street closure plan that details how vehicle traffic (including bus traffic, and potential temporary bus stop closure or relocation along Mercury Avenue), pedestrian traffic, and bicycle traffic will flow during temporary street closures during both Phase I and Phase II of project construction. (Draft EIR, p. 4.14-10.)

The project site is not adjacent to nor accessed by a road designated as a disaster route. The project would also comply with all applicable codes and ordinances for emergency access. Therefore, with adherence to regulatory requirements and implementation of a Construction Management Plan, construction of the project would not impair implementation of, or physically interfere with, any adopted or onsite emergency response or evacuation plans. (Draft EIR, p. 4.14-10.)

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

Project Operation

During operation, the project would not involve any activities that would impede public access or travel along the public right-of-way or interfere with an adopted emergency response or evacuation plan. The project site plan will be reviewed by the Los Angeles Fire Department and the project complies with all emergency access and sight line requirements. Therefore, the project would not result in inadequate emergency access during operation and no impacts would occur. In addition, the increase in traffic generated by the project would not significantly impact emergency vehicle response to the project site and surrounding uses, including along City-designated disaster routes since the drivers of emergency vehicles are able to avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. **Therefore, there would be no impacts associated with emergency response and emergency evacuation plans.** (Draft EIR, p. 4.14-12.)

Furthermore, the project would not include a land use that would constitute a potential hazard to the community (such as an airport, oil refinery, or chemicals plant), nor would it close any existing streets or otherwise represent a significant impediment to emergency response and evacuation of the local area. **Therefore, the project's proposed land uses would not require a new, or interfere with an existing risk management, emergency response, or evacuation plan, and no impacts are anticipated.** (Draft EIR, p. 4.14-12.)

2. Pollutant Concentrations

Threshold: Would the Project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of wildfire?

Finding: Less than significant. (Draft EIR, 4.14-12—4.14-13.)

Explanation: The project would not exacerbate wildfire risks because the project would include required fire suppression design features (i.e., fire-resistant building materials, where appropriate, smoke detection and fire alarm systems, automatic sprinkler systems (in compliance with all applicable City and Fire codes), portable fire extinguishers, and emergency signage in all buildings, and required brush clearance), identified in the latest edition of the California Building Code. The project would not require the installation or maintenance of infrastructure that may exacerbate fire risk because it is an infill development project in an already urban and developed portion of the City of Los Angeles. (Draft EIR, p. 4.14-12.)

The landscape design for Rose Hill Courts would include plant materials that are both drought tolerant and fire resistant. Plants adjacent to

buildings would be spaced further apart, and trees would be smaller to medium sized. Consideration has been given to "firewise landscaping", which factors in; plant selection, plant placement, and maintenance. Plant spacing near the buildings would be increased to mitigate fire from spreading horizontally. Trees would be selected for their fire resistant characteristics and would be planted away from buildings. A permanent automatic irrigation system would be installed onsite. The landscaping onsite would be maintained on a regular schedule. Landscaping would be trimmed, cleared, and all dead material would be removed. Additionally, all grass and weeds within 200 feet of structures would either be removed or cut back and native shrubs would be trimmed and be kept 18 feet from any structure or other native shrubs. All trellis structures would be made of steel so as not to be flammable. (Draft EIR, p. 4.14-12.)

The existing buildings onsite have aging termite infested wood frames and no fire suppression sprinklers. The new buildings would be built to current codes and would include fire suppression sprinklers and safety features. The project would be required to comply with City of Los Angeles Building Code and safety regulations pertaining to development in a very high fire hazard severity zone. Per the 2017 Los Angeles City Fire Code, Section 301, the provisions of that chapter shall govern the occupancy and maintenance of all structures and premises for precautions against fire and the spread of fire and general requirements of fire safety (ICC Public Access, 2018). The project is required to comply with all applicable chapters of the City of Los Angeles Fire Code, including but not limited to Section 315, General Storage, regarding storage of combustible materials; Chapter 6, Building Services and Systems; Chapter 7, Fire and Smoke Protection Features; and Chapter 9, Fire Protection Systems (ICC Public Access, 2018). Therefore, the new buildings would include materials and fire safety features that would be more fire resistant and safer than the existing buildings. **Therefore, with compliance with all applicable regulations, the project would have less than significant impacts related to risk of loss, injury or death involving wildland fires**. (Draft EIR, p. 4.14-13.)

3. Infrastructure Risks

Threshold: Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Finding: Less than significant. (Draft EIR, 4.14-13.)

Explanation: The proposed project includes offsite utility improvements in the public right of way for water, sewer, and electricity. No installation of fuel breaks or emergency water sources would be required. The new water, power, and sewer lines would be installed where the existing aging utilities are currently located. The proposed utility upgrades would improve the service and longevity of those utilities, which would be constructed in compliance with all applicable City and Fire codes identified in the latest

edition of the California Building Code. The project is an infill development project in an already urban and developed portion of the City of Los Angeles, and therefore would not require installation of infrastructure that would exacerbate fire risks or result in temporary or ongoing impacts to the environment. Furthermore, the impacts from installation of new utilities would only be temporary during construction. **Therefore, impacts regarding this threshold would be less than significant.** (Draft EIR, p. 4.14-13.)

4. Runoff Risks

Threshold: Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Finding: No impact. (Draft EIR, p. 4.14-13.)

Explanation: The project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides related to post fire instability because the project site is not located on a steep slope or hillside and has been designed with the topography of the site and surrounding areas in mind. **Therefore, there would be no impacts regarding this threshold and no further analysis is required**. (Draft EIR, p. 4.14-13.)

T. ENERGY

1. Wasteful Use of Energy

Threshold: Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Finding: Less than significant. (Draft EIR, 4.5-11—4.5-15.)

Explanation: According to the CEQA Guidelines, "[u]ses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified." Therefore, the purpose of this analysis is to identify any significant irreversible environmental effects of project implementation that cannot be avoided. (Draft EIR, p. 4.15-12.)

In evaluating potential energy impacts, it is necessary to take into account certain project design features that would reduce energy use. In general, they include (Draft EIR, p. 4.15-12.):

GHG-PDF-1: Exceeding Title 24, Part 6, California Energy Code baseline standard requirements for energy efficiency, based on the 2016 Building Energy Efficiency Standards requirements.

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

Seven water conservation measures (**GHG-PDF-3** through **GHG-PDF-6** and **GHG PDF-8** through **GHG-PDF-10**): reducing water use cuts down on the energy needed to treat water, transport it to the residences, and treat it after it is disposed.

GHG-PDF-7: Prohibiting the use of fossil-fueled fireplaces in the proposed residential units.

These design features will help ensure that the project will not have "wasteful, inefficient, or unnecessary consumption of energy resources," during project construction or operation.

Both construction and operation of the project would lead to the consumption of limited, slowly renewable, and non-renewable resources, committing such resources to uses that future generations would be unable to reverse. The new development would require the commitment of resources that include: (1) building materials; (2) fuel and operational materials/resources; and (3) the transportation of goods and people to and from the project.

Construction

Electricity

During project construction, energy would be consumed in the form of electricity associated with the conveyance and treatment of water used for dust control and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. (Draft EIR, p. 4.15-12.)

Electricity use for project construction was estimated by the methods described in Section 4.15.3.2 of the Draft EIR. The analysis did not include electricity from the onsite electrical generator. Due to the fact that electricity usage associated with lighting and construction equipment that utilizes electricity is not easily quantifiable or readily available, the estimated electricity usage during project construction is speculative. During project construction, which includes a demolition phase, the amount of energy used onsite would incrementally decrease because the existing units/buildings that use electricity would be removed from the project site during the demolition phase. (Draft EIR, p. 4.15-12—4.15-13.)

Lighting used during project construction would comply with Title 24 standards/requirements (such as wattage limitations). This compliance will ensure that electricity use during project construction would not result in the wasteful, inefficient, or unnecessary use of energy. Lighting will be used in compliance with all City of Los Angeles Municipal Code requirements to create enough light for safety. As shown in Table 4.15-1 below, 3,238 kWh of electricity are anticipated to be consumed during project construction. **Therefore, the proposed Project is anticipated to have a less than significant impact related to the demand for electricity during project construction**. (Draft EIR, p. 4.15-13.)

Natural Gas

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Therefore, the proposed Project is not anticipated to have a demand for natural gas during project construction. (Draft EIR, p. 4.15-13.)

Transportation Energy

Project construction would consume energy in the form of petroleum-based fuels associated with the use of offroad construction vehicles and equipment on the Project site, construction worker travel to and from the project site, and delivery and haul truck trips hauling solid waste from and delivering building materials to the project site. As shown in Table 4.15-1, 12,443 gallons of gasoline and 49,941 gallons of diesel fuel are estimated to be consumed during construction. (Draft EIR, p. 4.15-14.)

During project construction, trucks and construction equipment would be required to comply with ARB's anti-idling regulations. ARB's In-Use Off-Road Diesel-Fueled Fleets regulation would also apply. Vehicles driven to or from the project site (delivery trucks, construction employee vehicles, etc.) are subject to fuel efficiency standards requirements established by the Federal Government. **Therefore, Project construction activities regarding fuel use would not result in wasteful, inefficient, or unnecessary use of energy and impacts would be less than significant**. (Draft EIR, p. 4.15-14.)

Operation

During project operations, energy would be consumed for space and water heating, water conveyance, solid waste disposal, and vehicle trips. Estimated project operation energy usage, which was estimated by CalEEMod as part of the greenhouse gas emissions analysis, is shown in Table 4.15-2 of the Draft EIR. (Draft EIR, p. 4.15-14.)

Electricity

Under the Project, all the existing buildings will be demolished and 185 new housing units will be built, along with a community building, landscaping, and recreational amenities. The project would comply with all applicable regulations and codes that require achievement of various levels of energy efficiency in building construction, design and operation. Electricity use per resident is predicted to decrease by about 32%. (Draft EIR, p. 4.15-14.)

Natural Gas

There would be an approximately 25% decrease in per capita natural gas use associated with operations of the proposed Project, compared to existing conditions. This reflects efficiencies achieved by Title 24 and other energy reducing regulations and programs. (Draft EIR, p. 4.15-14.)

Transportation Energy

Total VMT are projected to increase by about 1,181,329 vehicle-miles per year. However, VMT per capita are projected to decrease substantially as result of the project. Per capita VMT will be about 37% lower. As a result, per-capita consumption of gasoline and diesel fuels will decrease by a comparable amount. (Draft EIR, p. 4.15-14—4.15-15.)

Further, the roadway network in the vicinity of the Project site is served by the Los Angeles County Metropolitan Transportation Authority (Metro). Residents, employees, and visitors would be able to access the project site via Metro's public transit system, thereby reducing transportation-related fuel demand. (Draft EIR, p. 4.15-15.)

Regulations and codes described above under Section 4.15.2 limit the amount of energy consumed by new development. Nevertheless, the consumption of such resources would represent a long-term commitment of those resources. The commitment of resources required for the construction and operation of the project would limit the availability of such resources for future generations or for other uses during the life of the project. However, continued use of such resources is consistent with the anticipated growth within the City and the general vicinity and would not result in energy consumption requiring a significant increase in energy production for the energy provider. **Therefore, the energy demand associated with Project operations would be less than significant**. (Draft EIR, p. 4.15-15.)

2. Energy Efficiency Plans

Threshold: Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Finding: Less than significant. (Draft EIR, 4.14-10—4.14-12.)

Explanation: According to the CEQA Guidelines, "[u]ses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified." Therefore, the purpose of this analysis is to identify any significant irreversible environmental effects of project implementation that cannot be avoided. (Draft EIR, p. 4.15-12.)

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GHG-PDF-7: Prohibiting the use of fossil-fueled fireplaces in the proposed residential units.

These design features will help ensure that the project will not have "wasteful, inefficient, or unnecessary consumption of energy resources," during project construction or operation.

Both construction and operation of the project would lead to the consumption of limited, slowly renewable, and non-renewable resources, committing such resources to uses that future generations would be unable to reverse. The new development would require the commitment of resources that include: (1) building materials; (2) fuel and operational materials/resources; and (3) the transportation of goods and people to and from the project.

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construction. (Draft EIR, p. 4.15-14.)

During project construction, trucks and construction equipment would be required to comply with ARB's anti-idling regulations. ARB's In-Use Off-Road Diesel-Fueled Fleets regulation would also apply. Vehicles driven to or from the project site (delivery trucks, construction employee vehicles, etc.) are subject to fuel efficiency standards requirements established by the Federal Government. **Therefore, Project construction activities regarding fuel use would not result in wasteful, inefficient, or unnecessary use of energy and impacts would be less than significant**. (Draft EIR, p. 4.15-14.)

Operation

During project operations, energy would be consumed for space and water heating, water conveyance, solid waste disposal, and vehicle trips. Estimated project operation energy usage, which was estimated by CalEEMod as part of the greenhouse gas emissions analysis, is shown in Table 4.15-2 of the Draft EIR. (Draft EIR, p. 4.15-14.)

Electricity

Under the Project, all the existing buildings will be demolished and 185 new housing units will be built, along with a community building, landscaping, and recreational amenities. The project would comply with all applicable regulations and codes that require achievement of various levels of energy efficiency in building construction, design and operation. Electricity use per resident is predicted to decrease by about 32%. (Draft EIR, p. 4.15-14.)

Natural Gas

There would be an approximately 25% decrease in per capita natural gas use associated with operations of the proposed Project, compared to existing conditions. This reflects efficiencies achieved by Title 24 and other energy reducing regulations and programs. (Draft EIR, p. 4.15-14.)

Transportation Energy

Total VMT are projected to increase by about 1,181,329 vehicle-miles per year. However, VMT per capita are projected to decrease substantially as result of the project. Per capita VMT will be about 37% lower. As a result, per-capita consumption of gasoline and diesel fuels will decrease by a comparable amount. (Draft EIR, p. 4.15-14—4.15-15.)

Further, the roadway network in the vicinity of the Project site is served by the Los Angeles County Metropolitan Transportation Authority (Metro). Residents, employees, and visitors would be able to access the project site via Metro's public transit system, thereby reducing transportation-related fuel demand. (Draft EIR, p. 4.15-15.)

Regulations and codes described above under Section 4.15.2 limit the amount of energy consumed by new development. Nevertheless, the consumption of such resources would represent a long-term commitment of those resources. The commitment of resources required for the construction and operation of the project would limit the availability of such resources for future generations or for other uses during the life of the project. However, continued use of such resources is consistent with the anticipated growth within the City and the general vicinity and would not result in energy consumption requiring a significant increase in energy production

for the energy provider. **Therefore, the energy demand associated with Project operations would be less than significant**. (Draft EIR, p. 4.15-15.)

3. Appendix F of CEQA Guidelines and City of Los Angeles Thresholds Guide

Threshold: Would the Project conflict with or obstruct the eight specific energy criteria specified in CEQA Guidelines, Appendix F, and the City of Los Angeles Thresholds Guide?

Finding: Less than significant. (Draft EIR, 4.15-17—4.14-19.)

Explanation: The Project was also reviewed against the eight specific energy significance criteria specified in CEQA Guidelines, Appendix F and the City of Los Angeles Thresholds Guide. The results of the review are as follows.

1. The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project, including construction, operation, maintenance and/or removal. If appropriate, the energy intensiveness of materials may be discussed.

As detailed in the preceding subsections, project construction will require relatively little electricity and no natural gas. Gasoline and diesel fuel use for onsite construction will be limited by increasing stringent requirements on engine efficiency and idling times. During project operations (when the new units are occupied), it is demonstrated in Table 4.15-2 that per-capita consumption of electricity, natural gas, and transportation fuels will decrease, due to adherence to efficiency standards, project design features that go beyond regulatory requirements, and increasing density on the project site. The amount of electrical energy and transportation fuel required is not wasteful and can easily be satisfied by existing capacities of electrical energy and motor fuels. As a result, the Project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. (Draft EIR, p. 4.15-17.)

2. The effects of the project on local and regional energy supplies and on requirements for additional capacity.

LADWP supplies 26 million megawatt-hours of electricity to its residential and industrial customers annually. The Project will result in an increase of 364,947 kilowatt-hours of electrical demand. This will represent an 0.0014% increase in demand. This is far below the amount necessary to have a significant impact on the LADWP's ability to supply electricity in the region. No additional capacity will be needed. (Draft EIR, p. 4.15-17.)

Residential customers in Los Angeles County used 1.12 x 1014 BTU of natural gas in 2017. The Project site's natural gas use will increase by 1,300,088 BTU after the project is built. Thus, the demand will increase by about 0.0000012%. This is far below the amount necessary to have a significant impact on SoCalGas' ability to supply natural gas in the region.

No additional capacity will be needed. (Draft EIR, p. 4.15-17.)

In 2018, onroad motor vehicles in Los Angeles County used 3.38 billion gallons of gasoline and 561 million gallons of diesel fuel. The project is estimated to increase gasoline and diesel fuel use by 22,364 and 5,881 gallons per year, respectively. These increases are 0.0007% and 0.0010%, respectively. This is far below the amount necessary to have a significant impact on motor fuel distributors ability to supply gasoline and diesel fuel in the region. No additional capacity will be needed. (Draft EIR, p. 4.15-17.)

As energy consumption during project construction would be relatively negligible, the Project would not have a significant effect on regional energy consumption during the construction phase. During project operation, it is anticipated that the LADWP, SoCalGas, and motor fuel suppliers will have adequate supplies to meet project energy demands, without the need to expand their capacities. (Draft EIR, p. 4.15-18.)

3. The effects of the project on peak and base period demands for electricity and other forms of energy.

The Project would continue to have the same pattern of energy use. As noted in the analysis for the previous criterion, the project will contribute a very small amount to annual demands for energy use, and its proportionate demand for baseline and peak periods would similarly be negligible. (Draft EIR, p. 4.15-18.)

4. The degree to which the project complies with existing energy standards.

As noted above, the Project would comply with all applicable regulations and codes which require achievement of various levels of energy efficiency in building construction, design and operation. In addition, the project design features described above, will result in savings beyond those required by the regulations and codes. (Draft EIR, p. 4.15-18.)

5. The effects of the project on energy resources.

To the extent that the Project consumes fossil fuels, it will permanently decrease the world's energy resources. However, the project would comply with all applicable regulations and codes which require achievement of various levels of energy efficiency in building construction, design and operation, so that use of all energy sources (including fossil fuels) will be lower than they would be without the regulations. In addition, the statewide and City specific regulations and plans will make it easier to use renewable energy resources and therefore slow the depletion of fossil fuel resources. (Draft EIR, p. 4.15-18.)

6. The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

As discussed under the second criterion above, the Project's transportation energy requirements are relatively small, and per-capita fuel use will decrease. In addition, residents will be able to use readily available and nearby public transit services, to further reduce energy use. (Draft EIR, p. 4.15-18.)

7. The degree to which the project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements.

Project design features that incorporate energy conservation measures were presented above. (Draft EIR, p. 4.15-18.)

8. Whether the project conflicts with adopted conservation plans.

The project will not conflict with any adopted conservation plan. Building design will comply with applicable provisions of the City of Los Angeles Green Building Code. In addition, the Project is compatible with the 2016-2040 RTP/SCS because it will decrease per-capita VMT. It is also located in a high-quality transit area, so that Metro buses are a real alternative to passenger car travel. The project's energy saving features result in decreases in per capita consumption, blunting the energy impacts of population growth. (Draft EIR, p. 4.15-18—4.15-19.)

Based on the information provided above, the proposed Project would have a less than significant impact regarding wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. The Project would also have a less than significant impact regarding conflict with or obstruction of a state or local plan for renewable energy or energy efficiency. (Draft EIR, p. 4.15-19.)

SECTION III
IMPACTS THAT ARE LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

The Board of Commissioners hereby finds that Mitigation Measures have been identified in the EIR that will avoid or substantially lessen the following potentially significant environmental impacts to a less than significant level. The potentially significant impacts, and the Mitigation Measures that will reduce them to a less than significant level, are as follows:

A. BIOLOGICAL RESOURCES

1. Sensitive or Special Status Species

Threshold: Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Finding: Less than significant with mitigation. (Draft EIR, pp. 4.3-14—4.3-15.)

Explanation: The Project Site is located in a highly-urbanized setting which provides low habitat value for special status plant and wildlife species. The literature review and reconnaissance biological survey conducted in May 2018 assessed that the Project Site contains structures, sidewalks, and multiple paved surface areas with impervious surfaces that lacks suitable soils, biological resources, and physical features to support any candidate, sensitive, or special-status plant and animal species. The Special Status Plants and Wildlife Occurrence Potential table within the BRE also indicates that there is no potential for these special status species to occur within the Project Site (due to lack of suitable habitat). Additionally, no special-status plants or wildlife were observed within the Project Site during site surveys. A preliminary tree survey was conducted in December 2016 by Jan C. Scow, Arborist, on the grounds of Rose Hill Courts. Five Quercus suber (cork oak) were identified onsite, which are not a protected species of oak. There are no protected trees onsite (Scow, 2016). **Therefore, no direct or indirect impacts on special-status plant or animal species would occur as a result of the Project activities.** (Draft EIR, p. 4.3-14.)

Native bird species such as the mourning doves, California towhee (Melozone crissalis), house finch (Haemorhous mexicanus), etc. 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. The Project Site contains ornamental vegetation and building structures that could potentially provide cover and nesting habitat for common bird species that have adapted to urban areas, such as rock pigeons (Columba livia) and mourning doves (Zenaida macroura). Indirect impacts on nesting birds could occur from increased noise, vibration, and dust during construction, which could adversely affect the breeding behavior of some birds, and lead to the loss (take) of eggs and chicks, or nest abandonment. The Project would remove all vegetation and demolish building structures currently onsite; as a result, the Project has the potential to impact migratory non-game breeding birds, and their nests, young and eggs. Mitigation measures **BR-1** and **BR-2** is required to reduce potential impacts regarding this threshold to less than significant. (Draft EIR, p. 4.3-14.)

In compliance with the MBTA, in vegetation removal, ground disturbance, or any other construction activity is scheduled to begin during the nesting bird season (generally February 1 – August 31), mitigation measures BR-1 and BR-2 would be implemented, and impacts on nesting bird species protected by the MBTA would be less than significant. (Draft EIR, p. 4.3-14.)

With the implementation of mitigation measures BR 1 and BR 2, potential impacts on biological resources would be reduced to less than significant levels. (Draft EIR, p. 4.3-15.)

BR-1: ***Nesting Bird Surveys***

If Project activities begin during nesting bird season (generally February 1 – August 31), no earlier than one week prior to ground-disturbing activities, a qualified biologist shall conduct preconstruction nesting bird clearance surveys within the Project Site and within a 100-foot buffer around the Project Site for nesting birds, and other sensitive species.

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

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

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

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

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

BR-2: ***Biological Monitor***

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

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

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

A. GEOLOGY AND SOILS

2. Faults, Ground Shaking, Liquefaction, and Landslides

Threshold: Would the Project expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:

- Strong seismic ground shaking?
- Seismic-related ground failure, including liquefaction?

Finding: Less than significant with mitigation. (Draft EIR, pp. 4.5-28—4.5-31.)

Explanation: **Strong seismic ground shaking?**

The Project Site is located within a seismically active region and could be subjected to strong ground shaking in the event of an earthquake. However, according to the Geotechnical Investigation prepared for the Project, this hazard is common in Southern California and the effects of ground shaking can be mitigated if the proposed structures are designed and constructed in conformance with current building codes and engineering practices. (Draft EIR, p. 4.5-29.)

The Project would be constructed in accordance with applicable CBC adopted by the legislature and used throughout the state, and requirements from State of California's Department of General Services, Division of the State Architect. Furthermore, as with other development projects in the City, the Project would comply with the Los Angeles Building Code, which incorporates current seismic design provisions of the CBC, with City amendments, to minimize seismic impacts. The CBC incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and maximize earthquake safety. (Draft EIR, p. 4.5-29.)

The Los Angeles Department of Building and Safety is responsible for implementing the provisions of the Los Angeles Building Code, and thus the Project would be required to comply with the plan review and permitting requirements of the Los Angeles Department of Building and Safety, including the recommendations provided in a final, site-specific geotechnical report subject to review and approval by the Los Angeles Department of Building and Safety, as set forth below in mitigation measure **GEO-1**. The final geotechnical report would include the recommendations of the Geotechnical Investigation, and its final recommendations would be enforced by the Los Angeles Department of Building and Safety for the construction of the Project. Through compliance with regulatory requirements, site-specific geotechnical recommendations contained in a final design-level geotechnical engineering report required by mitigation measure **GEO-1** below, the Project would not exacerbate existing environmental conditions or cause or accelerate geologic hazards related to strong seismic ground shaking, which could result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. **Therefore, impacts related to this threshold would be less than significant.** (Draft EIR, p. 4.5-29.)

Seismic-related ground failure, including liquefaction?

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. As discussed in the Geotechnical Investigation, a liquefaction analysis was performed for borings B1 and B2 at the Project Site for both the Design Earthquake level and the Maximum Considered Earthquake level. For a Design Earthquake level, a historic high groundwater table of 20 feet below the ground surface, a magnitude 6.62 earthquake, and a peak horizontal acceleration of 0.702g (which is ⅔ of the Maximum Considered Earthquake peak ground

acceleration or PGAM) were used for the liquefaction analysis. The results indicate that the alluvial soils below the historic high groundwater level are not susceptible to liquefaction settlement during Design Earthquake ground motion. For a Maximum Considered Earthquake level, a historic high groundwater table of 20 feet below the ground surface, a magnitude 6.61 earthquake, and a peak horizontal acceleration of 1.053g (PGAM) were used for the liquefaction analysis. The results indicate that the alluvial soils below the historic high groundwater level are also not susceptible to liquefaction settlement during Maximum Considered Earthquake ground motion. (Draft EIR, pp. 4.5-29—4.5-30.)

Seismically-induced settlement may occur if an earthquake causes the dynamic compaction of dry and loose sands. Typically, settlements occur in thick beds of such soils. As detailed in the Geotechnical Investigation Report, a seismically-induced settlement analysis was performed in accordance with the American Society of Civil Engineers, Technical Engineering and Design Guides as adapted from the US Army Corps of Engineers, No. 9. The calculations for borings B1 and B2 indicate that the soil above the historic high groundwater level of 20 feet could be susceptible to approximately 0.11 and 0.14 inch, respectively, of settlement as a result of the Design Earthquake level peak ground acceleration (⅔PGAM) and could be susceptible to approximately 0.39 and 0.38 inches, respectively, of settlement as a result of the Maximum Considered Earthquake level peak ground acceleration (PGAM). Differential settlement at the foundation level is anticipated to be less than 0.1 inch over a distance of 20 feet (Geocon, 2019, p. 9 and 11). (Draft EIR, p. 4.5-30.)

According to the Geotechnical Investigation Report, the existing fill at the Project Site, in its present condition, is not suitable for direct support of proposed foundations or slabs. Furthermore, paving constructed over existing uncertified fill or unsuitable soils may experience increased settlement and/or cracking, and may therefore have a shorter design life. As recommended in the Geotechnical Investigation, the upper 5 feet of existing earth materials in the building footprint areas would be excavated and properly compacted for foundation and slab support. Deeper excavations would be conducted as needed to remove any encountered fill or soft soils as necessary at the direction of the Geotechnical Engineer. Proposed building foundations would be underlain by a minimum of 3 feet of newly placed engineered fill. For paved areas, at a minimum, the upper 12 inches of soil would be scarified and properly compacted. (Draft EIR, p. 4.5-30.)

As required by the California State Building Code (Title 24), the structural engineer would evaluate the proposed structure for the anticipated seismically-induced settlements and verify that anticipated deformations would not cause the foundation system to lose the ability to support the gravity loads and/or cause collapse of the structure. Seismic building code requirements such as this utilize information gained by many institutional, state, and federal agencies since the 1994 Northridge Earthquake and subsequent earthquakes and, **when implemented,**

reduce potential impacts due to settlement to less than significant. (Draft EIR, p. 4.5-30.)

The Project would be required to comply with the plan review and permitting requirements of the Los Angeles Department of Building and Safety, including the recommendations provided in a final, site-specific geotechnical report subject to review and approval by the Los Angeles Department of Building and Safety, as set forth below in mitigation measure **GEO-1**. The final recommendations from that report would be enforced for the construction of the Project. The Project would also be required to comply with the permitting requirements of the Los Angeles Building Code, which incorporates current seismic design provisions of the CBC, with City amendments, to minimize seismic impacts. **Therefore, with implementation of mitigation measure GEO-1, the Project would have a less-than-significant impact regarding seismic-related ground failure including liquefaction**. (Draft EIR, p. 4.5-30—4.5-31.)

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

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

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

- ***All excavations shall be observed and approved in writing by the Geotechnical Engineer. Prior to placing any fill, the excavation***

bottom shall be proof-rolled with heavy equipment in the presence of the Geotechnical Engineer.

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

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

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

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

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

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

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

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

- ***All surface water shall be diverted away from excavations.***

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

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

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

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

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

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

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

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

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

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

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

3. Unstable Soils

Threshold: 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?

Finding: Less than significant with mitigation. (Draft EIR, pp. 4.5-32—4.5-34.)

Explanation: Slope Stability/Landslide: The topography within the Project Site is relatively flat. Topography at the site slopes to the southeast at a gradient flatter than 5:1 (H:V). The Project Site is located within a City of Los Angeles Hillside Grading Area and a Hillside Ordinance Area (City of Los Angeles, 2018). However, the site is not located within an area identified as having a potential for seismic slope instability by the State of California (CDMG, 1999; CGS, 2017), and there are no known landslides near the site, nor is the site in the path of any known or potential landslides (Geocon, 2019). **Therefore, the probability of slope stability hazards (i.e., landslides) affecting the site is less than significant (Geocon, 2019, p. 9).** (Draft EIR, p. 4.5-32.)

Lateral Spreading: Lateral spreading is the downslope movement of surface sediment due to liquefaction in a subsurface layer. The downslope movement is due to gravity and earthquake shaking combined. Lateral spreading of the ground surface during a seismic activity usually occurs along the weak shear zones within a liquefiable soil layer and has been observed to generally take place toward a free face (i.e., retaining wall, slope, or channel) and to lesser extent on ground surfaces with a very gentle slope. **Results of the tests conducted on the soils contained in the onsite borings indicate that the potential for liquefaction is less than significant** (Geocon, 2019, p. 8). **Therefore, impacts due to lateral spreading would also be less than significant**. (Draft EIR, p. 4.5-32.)

Subsidence: Subsidence occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. Soils that are particularly subject to subsidence include those with high silt or clay content. The site is not located within an area of known ground subsidence. No known large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at the site or in the general site vicinity. **Therefore, the potential for ground subsidence due to withdrawal of fluids or gases at the site is considered low and**

impacts due to subsidence would be less than significant (Geocon, 2019, p. 10). (Draft EIR, p. 4.5-32.)

Liquefaction Settlement: The Project's potential impacts associated with liquefaction are addressed above. Liquefaction is a phenomenon in which loose, saturated, relatively cohesionless soil deposits lose shear strength during strong ground motions. Primary factors controlling liquefaction include intensity and duration of ground motion, gradation characteristics of the subsurface soils, in-situ stress conditions, and the depth to groundwater. Liquefaction is typified by a loss of shear strength in the liquefied layers due to rapid increases in pore water pressure generated by earthquake accelerations (Geocon, 2019, p. 7). Results of the liquefaction analysis indicated that the alluvial soils below the historic high groundwater level are not susceptible to liquefaction settlement during either Design Earthquake ground motion or Maximum Considered Earthquake ground motion. (Draft EIR, p. 4.5-32.)

Seismically-induced settlement. Seismically-induced settlement may occur if an earthquake causes the dynamic compaction of dry and loose sands. The seismically-induced settlement analysis indicated that the soil above the historic high groundwater level of 20 feet could be susceptible to approximately 0.11 and 0.14 inch, respectively, of settlement as a result of the Design Earthquake level peak ground acceleration and could be susceptible to approximately 0.39 and 0.38 inches, respectively, of settlement as a result of the Maximum Considered Earthquake level peak ground acceleration. Differential settlement at the foundation level is anticipated to be less than 0.1 inch over a distance of 20 feet (Geocon, 2019, p. 9 and 11). (Draft EIR, pp. 4.5-32—4.5-33.)

According to the Geotechnical Investigation Report, the existing fill at the Project Site, in its present condition, is not suitable for direct support of proposed foundations or slabs. Furthermore, paving constructed over existing uncertified fill or unsuitable soils may experience increased settlement and/or cracking, and may therefore have a shorter design life. As recommended in the Geotechnical Investigation, the upper 5 feet of existing earth materials in the building footprint areas would be excavated and properly compacted for foundation and slab support. Deeper excavations would be conducted as needed to remove any encountered fill or soft soils as necessary at the direction of the Geotechnical Engineer. Proposed building foundations would be underlain by a minimum of 3 feet of newly placed engineered fill. For paved areas, at a minimum, the upper 12 inches of soil would be scarified and properly compacted. (Draft EIR, p. 4.5-33.)

The Project would be required to comply with the plan review and permitting requirements of the Los Angeles Department of Building and Safety, including the recommendations provided in a final, site-specific geotechnical report subject to review and approval by the Los Angeles Department of Building and Safety, as set forth below in mitigation measure **GEO-1**. The final recommendations from that report would be enforced for the construction of the Project. The Project would also be

required to comply with the permitting requirements of the Los Angeles Building Code, which incorporates current seismic design provisions of the CBC, with City amendments, to minimize seismic impacts. As such, with the implementation of mitigation measure **GEO-1**, impacts associated with liquefaction settlement or seismically-induced settlement would be reduced to a less than significant level. (Draft EIR, p. 4.5-33.)

Collapsible Soils. Collapsible soils consist of loose, dry, low-density materials that collapse and compact under the addition of water or excessive loading. Soil collapse occurs when the land surface is saturated at depths greater than those reached by typical rain events. As discussed above, the majority of the Project Site is on soils mapped as Urban land Ballona Typic Xerorthents, fine substratum complex, 0 to 5 percent slopes. This soil complex is typically found on alluvial fans, but consists mainly of discontinuous human transported material over young alluvium derived from sedimentary rock (Soil Survey Staff, 2018). As discussed in the Geotechnical Investigation Report, the site is underlain by artificial fill, Pleistocene age alluvial valley deposits, and Miocene age sedimentary bedrock of the Puente Formation. The artificial fill generally consists of silty sand, sandy silt, and clayey silt. Pleistocene age-old alluvial valley deposits consist primarily of clayey silt, silt, sandy silt, silt with sand, sand with silt, and silty sand. The alluvial soils are mostly fine-grained and characterized as dry to wet, firm to hard or medium dense to very dense. Based on the type and density of the soils underlying the Project Site, the Project Site soils would not be considered collapsible soils. The historically highest groundwater level in the area is approximately 20 feet beneath the ground surface but Perched groundwater was encountered in borings B1, B2, and B17 at depths of 15, 40, and 15 feet below ground surface respectively. The groundwater is interpreted to be perched on top of the less permeable Puente Formation bedrock. Based on the presence of only perched groundwater in the soil borings, the reported historic high ground water level in the area (CDMG, 1998), and the depth of the proposed construction, it is unlikely that groundwater will be encountered during construction. However, it is common for groundwater to seasonally occur in the area or for groundwater conditions to develop where none previously existed, especially in impermeable fine-grained soils which are heavily irrigated or after seasonal rainfall. In addition, recent requirements for stormwater infiltration could result in shallower seepage conditions in the immediate site vicinity. Proper surface drainage of irrigation and precipitation will be critical for future performance of the project. Recommendations for drainage were provided in the Geotechnical Investigation Report. (Draft EIR, pp. 4.5-33—4.5-34.)

The Project would be required to comply with the plan review and permitting requirements of the Los Angeles Department of Building and Safety, including the recommendations provided in a final, site-specific geotechnical report subject to review and approval by the Los Angeles Department of Building and Safety, as set forth below in mitigation measure **GEO-1.** The final recommendations from that report would be enforced for the construction of the Project. The Project would also be

required to comply with the permitting requirements of the Los Angeles Building Code, which incorporates current seismic design provisions of the CBC, with City amendments, to minimize seismic impacts. **As such, with the implementation of mitigation measure GEO-1, impacts associated with potential collapse would be reduced to a less than significant level**. (Draft EIR, p. 4.5-34.)

Based on the discussion above, and with the implementation of mitigation measure GEO-1, Project impacts regarding location on unstable soils, landslides, lateral spreading, subsidence, liquefaction or collapse would be less than significant. (Draft EIR, p. 4.5-34.)

4. Expansive Soils

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

Finding: Less than significant with mitigation. (Draft EIR, pp. 4.5-34—4.5-35.)

Explanation: Expansive soils shrink and swell with changes in soil moisture. Soil moisture may change from landscape irrigation, rainfall, and utility leakage. The upper 5 feet of soils encountered during the geotechnical investigation are considered to have a "low" to "moderate" (EI = 37 and 69) expansive potential and are classified as "expansive" based on the 2016 CBC § 1803.5.3 (Geocon, 2019, p. 13). (Draft EIR, p. 4.5-34.)

According to the Geotechnical Investigation Report, the existing fill at the Project Site, in its present condition, is not suitable for direct support of proposed foundations or slabs. Furthermore, paving constructed over existing uncertified fill or unsuitable soils may experience increased settlement and/or cracking, and may therefore have a shorter design life. As recommended in the Geotechnical Investigation, the upper 5 feet of existing earth materials in the building footprint areas would be excavated and properly compacted for foundation and slab support. Deeper excavations would be conducted as needed to remove any encountered fill or soft soils as necessary at the direction of the Geotechnical Engineer. Proposed building foundations would be underlain by a minimum of 3 feet of newly placed engineered fill. For paved areas, at a minimum, the upper 12 inches of soil would be scarified and properly compacted. Due to the expansive potential of the subgrade soils, the moisture content in the slab and foundation subgrade should be maintained at 2 percent above optimum moisture content prior to and at the time of concrete placement. (Draft EIR, p. 4.5-34.)

The 2016 CBC § 1808.6 specifies design requirements for buildings constructed on expansive soils. To be in compliance with the 2016 CBC and gain approval of Project building plans, the Project applicant would be required by the City of Los Angeles to design all building foundations as required by CBC § 1808.6. As stated above, the Project would be

required to comply with the plan review and permitting requirements of the Los Angeles Department of Building and Safety and Los Angeles Building Code, including the recommendations provided in a final, site-specific geotechnical report subject to review and approval by the Los Angeles Department of Building and Safety, as set forth below in mitigation measure **GEO-1**. The final recommendations from that report would be enforced for the construction of the Project, and in doing so direct and indirect impacts related to expansive soils would be reduced to less than significant. **Therefore, with implementation of mitigation measure GEO-1, Project impacts associated with location on expansive soils would be less than significant.** (Draft EIR, pp. 4.5-34—4.5-35.)

5. Unique Paleontological Resource/Site or Geologic Features

Threshold: Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Finding: Less than significant with mitigation. (Draft EIR, pp. 4.5-35—4.5-36.)

Explanation: The potential for encountering paleontological resources at the Project Site is dependent on the geological deposits that might be exposed. The geologic map of the Los Angeles 7.5' quadrangle by Yerkes (1997) shows the central and eastern portion of the Project Site as underlain with Older alluvium (Late Pleistocene)-soil deposits, and the far western edge with Upper Miocene Puente Formation (Yerkes, 1997). This is in agreement with both the geotechnical report which identified the upper layer of soil as Alluvium and that below the alluvium the borings encountered Puente Formation "Siltstone" (Geocon 2018). McLeod (2019) described the same two geologic deposits for the Project. The geologic map of the Los Angeles quadrangle can be recognized as the underlying source for the invertebrate fossil sensitivity map (Figure 4.5-6), on which the area marked for "surface sediments with unknown fossils potential" can be correlated with Qao (Older alluvium) soils, and the area marked for "bedrock where fossils are likely to be found" can be correlated to the Tpn1 (Puente Formation). (Draft EIR, p. 4.5-35.)

According to the LACM, Department of Vertebrate Paleontology (McLeod, 2019:1), shallow excavations in the younger Quaternary Alluvium in the western portion of the Project Site are unlikely to uncover any significant vertebrate fossils. However, deeper excavations that extend down into the Puente Formation, or any excavations in the Puente Formation exposed in the elevated terrain in the eastern portion of the Project Site may encounter significant to highly significant vertebrate fossil remains (McLeod 2019:3). (Draft EIR, p. 4.5-35.)

The geotechnical investigation encountered artificial fill extending from the surface to depths reaching 2½ feet to a maximum of 6 feet deep in nine of the 20 borings collected at the Project Site. Of the 20 borings collected, 11 of them did not have artificial fill but had Pleistocene-age old alluvial valley deposits at the surface. For the borings with artificial fill at

the surface, the alluvium was encountered below the artificial fill. Miocene-age sedimentary bedrock of the Puente Formation was encountered starting at depths from 11.5 to 47 feet below the Quaternary Alluvium at four of the boring sites on the Project Site (Geocon, 2019). According to the geological investigation report (Geocon, 2019: 12), excavations up to 12 feet in vertical height may be required for construction of structures tucked into existing slopes, including foundation and would require sloping and/or shoring measures in order to provide a stable excavation. (Draft EIR, p. 4.5-35.)

According to the Excavation Study for the Project (Fuscoe Engineering, 2019), the maximum depths of excavation for the Project would range from 8.7 feet for construction of Building E (in the southwestern portion of the Project Site) and for the infiltration gallery (at the northeast portion of the Project Site) to 29.8 feet for construction of Building C (at the northwest portion of the Project Site). As seen on Figure 2 of the geological investigation report (Geocon, 2019), boring sample B14 is located between proposed buildings B and C. The Puente Formation was encountered at 11.5 feet in B14 and the maximum excavation depths for construction of buildings B and C are 16.7 feet and 29.8 feet, respectively. The Puente Formation was also encountered at 15 feet in boring samples B1 and B17 in the eastern portion of the Project Site. Based on the planned depths of excavation on the Project Site and the potential for significant to highly significant vertebrate fossil remains to be encountered within the Puente Formation, construction of the proposed Project may result in potentially significant impacts to paleontological resources. Based on these findings, McLeod provided the following recommendations to mitigate potential Project impacts:

> …any substantial excavations in the proposed project area, therefore, should be monitored closely to quickly and professionally recover any fossil remains discovered while not impeding development. Also, sediment samples should be collected and processed to determine their small fossil potential. Any fossils recovered during mitigation should be deposited in an accredited and permanent scientific institution for the benefit of current and future generations. (McLeod, 2019) (Draft EIR, p. 4.5-36.)

With the implementation of recommended mitigation measure **PALEO-1**, impacts to paleontological resources from construction of the Project would be reduced to less than significant. (Draft EIR, p. 4.5-36.)

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

- ***Prior to the earth-moving activities, the paleontologist shall develop a site-specific Paleontological Resources Impact Mitigation Program (PRIMP) to be implemented in support of the Project in order to mitigate potential adverse impacts to paleontological resources. The PRIMP shall follow guidelines developed by the Society for Vertebrate Paleontology and shall include, but not be limited to, monitoring of ground disturbance activities in sediments that are likely to include paleontological resources, specimen recovery, and screen washing; preparation of any collected specimens to the point of identification; curation of any collected specimens to a museum repository with permanent, retrievable storage; and preparation of a final compliance report that would provide details of monitoring, fossil identification, and repository arrangements. The Project Applicant shall then comply with the recommendations of the Project paleontologist and requirements of the PRIMP.***

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

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

B. HAZARDS AND HAZARDOUS MATERIALS

1. Accident or Update

Threshold: Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident

conditions involving the release of hazardous materials into the environment?

Finding: Less than significant with mitigation. (Draft EIR, pp. 4.7-11—4.7-12.)

Explanation: **Recognized Environmental Conditions**

The following Recognized Environmental Conditions (i.e., ACM, LBP, lead, and radon gas) were identified on the Project Site (Altec, 2018).

Lead in soil. Lead was identified to be present along existing building foundations/perimeters. The most protective screening level for lead in residential soil in California is 80 mg/kg. Therefore, Altec recommends using this level for residential properties. Lead is present at concentrations above 80 mg/kg in the foundation/dripline soil around Buildings #2, #6, #7, #9, #11, #12, #13, and #14. A less conservative screening or clearance level of 1,000 mg/kg (published in California Code of Regulations Title 17 § 35036) was used for a soil removal effort performed at Rose Hill Courts in 2008; however, the Project indicated that the target property will be remediated to 80 mg/kg (Altec, 2018, p. 51) as required by HSC § 5708. For details of the lead test results, see the Revised Report for Limited Lead Testing performed by Altec, which covered paint sampling and soil sampling performed June 7, 2016 and December 5, 2016 (Altec, 2016b). (Draft EIR, p. 4.7-11.)

Although the environmental site assessment cited in Section 4.7 of the Draft EIR found lead in soils near the driplines of several existing buildings, it was assumed conservatively that lead would be present in soils up to five feet out from the building walls, and that the contaminated zone would be two feet deep. The volume of contaminated soil in the areas adjacent to building walls was estimated to be about 1,600 cubic yards. To take extra precaution, it was also assumed that aerially deposited lead was present at excessive concentrations in soils that are five feet in from sidewalks surrounding the site. The volume of this soil was estimated to be about 700 cubic yards. The total volume to be removed and transported offsite would thus be about 2,300 cubic yards. (Final EIR, p. III-4.)

Emissions of criteria pollutants and greenhouse gases (GHG) from lead-contaminated soil removal and transport were estimated with the CalEEMod emissions model, version 2016.3.2. They were then incorporated in the analysis of maximum daily project emissions and annual GHG emissions. Pertinent tables and text in Sections 4.2 and 4.8 of the Draft EIR were revised accordingly. Incorporation of the contaminated soil management into the air quality and GHG emissions analyses showed only small increases of criteria pollutants and GHG. (Final EIR, p. III-4.) **With the implementation of mitigation measure HAZ-1, potential impacts related to lead in soil would be less than significant.** See Section 4.7.7 of the Draft EIR. (Draft EIR, p. 4.7-11.)

Indoor radon gas. The CGS map of Indoor Radon Potential indicates that the Project is in an area with moderate potential for indoor radon gas levels at 4.0 pCi/L (CGS, 2005; Altec, 2018, p. 51). Due to the potential for indoor radon gas levels in excess of the USEPA standard of 4.0 pCi/L, mitigation will be required to reduce this potentially significant impacts related to indoor levels of radon gas upon completion of the Project. The Project will incorporate foundation design measures to prevent radon present from entering the new residences. Proposed building plans would be reviewed by the City of Los Angeles to determine if additional precautions are needed to mitigate potential radon gas impacts. **Implementation of mitigation measure HAZ-2 would reduce potential impacts from radon**. (Draft EIR, p. 4.7-12.)

Lead is present at concentrations above 80 mg/kg in the foundation/dripline soil around Buildings #2, #6, #7, #9, #11, #12, #13, and #14. Additionally, the Project Site is in an area that has a moderate potential for indoor radon gas levels at 4.0 pCi/L (CGS, 2005; Altec, 2018, p. 51). The Lead Agency will consult with the South Coast Air Quality Management District's Engineering and Permitting staff to determine what permits, plans or additional compliance measures need to be incorporated in the SMP. (Final EIR, p. III-5.) Due to the presence of lead in the soils and the potential for indoor radon gas levels in excess of the USEPA standard of 4.0 pCi/L, the following mitigation will be required to reduce potentially significant impacts of lead and radon. (Draft EIR, p. 4.7-15.)

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

- ***The recommendations of the HHMD and LAFD.***

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

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

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

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

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

C. PARKS AND RECREATION

1. Parks

Threshold: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks?

Finding: Less than significant with mitigation. (Draft EIR, pp. 4.11.d-11—4.11.d-14.)

Explanation: **Project Construction**

Construction of the Project would introduce construction jobs and therefore construction workers on the Project Site. However, construction jobs created by the Project would not result in substantial population growth in the Project area because construction jobs are temporary in nature. It is anticipated that the persons filling the construction jobs would be from the local area and would not result in an increase in population in the Project vicinity. (Draft EIR, p. 4.11.d-11—4.11.d-12.)

During Project construction, the construction workers could potentially visit nearby parks, such as Rose Hill Park directly north of the Project Site. It is expected they could potentially visit these parks only during their lunch breaks during the weekdays and not in the evening or on the weekends when they would not be working at the Project Site. However, less than significant impacts would occur during Project construction because construction workers would cease to visit nearby parks after the completion of construction. Additionally, due to the scope of the proposed

Project, there would not be a large number of construction workers on the Project Site. (Draft EIR, p. 4.11.d-12.)

During construction of the Project, there is the potential for short term impacts associated with air quality, noise and traffic; however, these typically do not result in physical impact on the parks or accelerate deterioration of parks. (Draft EIR, p. 4.11.d-12.)

The response to the information request letter sent to the City of Los Angeles Department of Recreation and Parks states: "Given the proximity of the project to Rose Hill Recreation Center and Ernest E. Debs Regional Parks extraordinary care should be taken to limit construction impacts and protect access to the parks" (Ford, 2018). Mitigation measure **PS 3** is recommended to reduce potential impacts on nearby park/recreation access to a less than significant level.(Draft EIR, p. 4.11.d-12.)

PS 3 ***Public Services (Access to Existing Park/Recreation Facilities During Construction)***

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

2. Deterioration

Threshold: 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?

Finding: Less than significant with mitigation. (Draft EIR, pp. 4.11.d-11—4.11.d-14.)

Explanation: **Project Construction**

Construction of the Project would introduce construction jobs and therefore construction workers on the Project Site. However, construction jobs created by the Project would not result in substantial population growth in the Project area because construction jobs are temporary in nature. It is anticipated that the persons filling the construction jobs would be from the local area and would not result in an increase in population in the Project vicinity. (Draft EIR, p. 4.11.d-11—4.11.d-12.)

During Project construction, the construction workers could potentially visit nearby parks, such as Rose Hill Park directly north of the Project Site. It is expected they could potentially visit these parks only during their lunch breaks during the weekdays and not in the evening or on the

weekends when they would not be working at the Project Site. However, less than significant impacts would occur during Project construction because construction workers would cease to visit nearby parks after the completion of construction. Additionally, due to the scope of the proposed Project, there would not be a large number of construction workers on the Project Site. (Draft EIR, p. 4.11.d-12.)

During construction of the Project, there is the potential for short term impacts associated with air quality, noise and traffic; however, these typically do not result in physical impact on the parks or accelerate deterioration of parks. (Draft EIR, p. 4.11.d-12.)

The response to the information request letter sent to the City of Los Angeles Department of Recreation and Parks states: "Given the proximity of the project to Rose Hill Recreation Center and Ernest E. Debs Regional Parks extraordinary care should be taken to limit construction impacts and protect access to the parks" (Ford, 2018). **Mitigation measure PS 3 (provided in Section 4.11.d.5 of Draft EIR) is recommended to reduce potential impacts on nearby park/recreation access to a less than significant level**.(Draft EIR, p. 4.11.d-12.)

3. Construction of New Facilities

Threshold: Would the Project include recreational facilities or require the construction or expansion of recreational facilities which have an adverse physical effect on the environment?

Finding: Less than significant with mitigation. (Draft EIR, pp. 4.11.d-11—4.11.d-14.)

Explanation: **Project Construction**

Construction of the Project would introduce construction jobs and therefore construction workers on the Project Site. However, construction jobs created by the Project would not result in substantial population growth in the Project area because construction jobs are temporary in nature. It is anticipated that the persons filling the construction jobs would be from the local area and would not result in an increase in population in the Project vicinity. (Draft EIR, p. 4.11.d-11—4.11.d-12.)

During Project construction, the construction workers could potentially visit nearby parks, such as Rose Hill Park directly north of the Project Site. It is expected they could potentially visit these parks only during their lunch breaks during the weekdays and not in the evening or on the weekends when they would not be working at the Project Site. However, less than significant impacts would occur during Project construction because construction workers would cease to visit nearby parks after the completion of construction. Additionally, due to the scope of the proposed Project, there would not be a large number of construction workers on the Project Site. (Draft EIR, p. 4.11.d-12.)

During construction of the Project, there is the potential for short term impacts associated with air quality, noise and traffic; however, these typically do not result in physical impact on the parks or accelerate deterioration of parks. (Draft EIR, p. 4.11.d-12.)

The response to the information request letter sent to the City of Los Angeles Department of Recreation and Parks states: "Given the proximity of the project to Rose Hill Recreation Center and Ernest E. Debs Regional Parks extraordinary care should be taken to limit construction impacts and protect access to the parks" (Ford, 2018). **Mitigation measure PS 3 is recommended to reduce potential impacts on nearby park/recreation access to a less than significant level**.(Draft EIR, p. 4.11.d-12.)

D. PUBLIC SERVICES

1. Police Protection

Threshold: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection?

Finding: Less than significant with mitigation. (Draft EIR, pp. 4.11.b-4—4.11.b-5.)

Explanation: **Project Construction**

The Project Site is located in the Central Bureau, Hollenbeck Division, 402 RD (LAPD, 2018b). Project construction would not generate a permanent population on the Project Site that would substantially increase the police service population in the Hollenbeck Division area. However, construction sites, if not properly secured, have the potential to generate a temporary increase in the demand for police protection services. There is an increased possibility for trespassing, vandalism, and unattractive nuisances during the construction phase of the Project. Security measures such as temporary fencing, lighting and locked entry, implemented during the construction phase are generally sufficient to feasibly deter activities related to theft and vandalism on construction sites. (Draft EIR, pp. 4.11.b-4—4.11.b-5.)

Project construction activities and construction staging areas would be contained within the boundary of the Project Site. Additionally, emergency vehicles normally have a variety of options for avoiding traffic, such as the use of sirens to clear a path of travel or for driving in lanes of opposing traffic. Therefore, the Project would not have a significant impact on the police response times or the provision of police protection services in the vicinity of the Project Site, during the construction phase. (Draft EIR, p. 4.11.b-5.)

Implementation of mitigation measure PS 1 would reduce temporary construction impacts on police protection services to a less than significant level. (Draft EIR, p. 4.11.b-5.)

Project Operation

The Project Site is served by the Hollenbeck Community Police Station. The officer to population ratio is of approximately one officer to 571 residents. The response to the information request letter sent to the City of Los Angeles Police Department indicates that the Project "could have a minor impact on police services in the Hollenbeck Area" (Davenport, 2018). The Project is expected to result in a net increase of 435 residents, compared to existing conditions. The Project would increase the Hollenbeck Division police service population to a population of roughly 200,435 and would result in an officer to population service ratio of approximately one officer to 573 residents. Therefore, the Project will not result in a substantial increase in the population and housing of the Project area, nor is it expected to significantly affect the existing service capacity of the LAPD. The increase in residences, visitors, employee and traffic in the area would not likely significantly increase the need for additional law enforcement services. Additionally, the Project would include exterior lighting that will be located on the buildings in addition to street, sidewalk and pathway lighting located across the entire site. The site will have security features including; cameras, controlled access to midrise buildings, and potentially controlled access to some of the parking areas. Ground rules will be established by the property management company (Related Management Company). (Draft EIR, p. 4.11.b-5.)

In response to public comments, implementation of mitigation measure PS 2 would enhance the safety of the Project Site and would result in less than significant impacts on police protection and law enforcement services.(Draft EIR, p. 4.11.b-5.)

PS 1 ***Public Services (Police – Demolition/Construction Sites)***

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

PS 2 ***Public Services (Police)***

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

measures shall be approved by the City of Los Angeles Police Department prior to the issuance of building permits.

E. TRANSPORTATION / TRAFFIC

1. Plans, Policies, and Ordinances

Threshold: Would the Project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Finding: Less than significant with mitigation. (Draft EIR, pp. 4.12-25—4.12-30.)

Explanation: **Construction Impacts**

During Project demolition and construction activities, delivery truck trips and construction employee commuting could significantly contribute to traffic within the study area. For this reason, an analysis of potential traffic impacts during the Project construction period was analyzed, based on the anticipated number of hauling/delivery trucks and employee vehicle trips (KOA, 2019, p.29). The construction of the proposed Project will occur in two phases, up to the planned Project completion year of 2025. The construction trip generation intensities will vary based on the construction phase, truck hauling patterns, and construction employment intensities. During the peak traffic period some locations in the study area may be affected by construction traffic, especially the intersection of Monterey Road and Huntington Drive, where for future conditions without the proposed Project the AM peak-hour LOS is E and the PM peak-hour LOS is D (KOA, 2019, p. 29). Mitigation Measure **TRANS-1** is recommended to reduce potential construction-phase impacts to a less than significant level. (Draft EIR, p. 4.12-25.)

Public Transit Service-During Project Construction

Construction of the Project may result in temporary relocation of bus stops or rerouting of bus Line 252, as well as temporary lane closures, which would affect vehicle flow in the vicinity of the Project Site. **Mitigation measure TRANS-2 is recommended to reduce potential construction-related impacts on transit services to a less than significant level.** (Draft EIR, p. 4.12-27.)

Project Construction Parking

During Project construction the Project is anticipated to temporarily reduce the number of on-street parking spaces available. Parking for construction workers would be either onsite or offsite and would only occur during construction hours in the day. It is anticipated that on-street by parking by construction workers would not be prohibited. To ensure that the Project would have less than significant impacts to parking availability during the construction phase, prior to construction activities, the Project applicant will prepare a construction parking management

plan that details how parking will be managed during Phase I and Phase II of Project construction. The parking management plan will specify where onsite and offsite parking will be available during both phases of Project construction. **Mitigation measure TRANS-2 is recommended to ensure that temporary Project construction impacts on street parking are reduced to a less than significant level via implementation of a construction parking management plan**. (Draft EIR, p. 4.12-28.)

Bicycle and Pedestrian Access

As stated above regarding existing conditions, no bike lanes are located on any of the streets adjacent to the Project Site. Additionally, there are no existing, funded, or proposed bicycle paths, lanes, or routes adjacent to or near the Project Site. **The Project would have no impact on the nearest bicycle route**, which is located along Griffin Avenue, approximately 1.4 miles west of the Project Site (Google Earth Pro, 2018). (Draft EIR, p. 4.12-29.)

The existing pedestrian access to and from the Project Site (the sidewalks along McKenzie Avenue, Florizel Street, Boundary Avenue and Mercury Avenue) would not be affected by the project. Curb cuts would be added for the driveways proposed along Mercury Avenue (two driveways), Florizel Street (three driveways), and McKenzie Avenue (one driveway), however, pedestrian access would not be significantly affected, as sidewalks would not be removed as part of the project. The crosswalk located along the sidewalk along McKenzie Avenue to Mercury Avenue would not be altered. (Draft EIR, p. 4.12-29.)

After Project construction is complete, with the exception of curb cuts necessary for driveways, the Project would not adversely affect sidewalks adjacent to the Project Site. **Therefore, pedestrian access to the Project Site would not be significantly affected upon Project completion.** (Draft EIR, pp. 4.12-29—4.12-30.)

Vision Zero Los Angeles is the City of Los Angeles' commitment to eliminate all traffic deaths by 2025. LADOT has identified a network of streets, the HIN, where strategic investments will have the biggest impact in reducing deaths and severe injuries. The nearest HIN intersection to the Project Site is North Broadway and Mission Road, approximately 0.8 mile southwest of the Project Site (City of Los Angeles Vision Zero, 2018). Approximately 25 percent (approximately 89 daily trips) would be distributed along North Broadway. The Project would be required to conform to City sight line standards and sidewalk design, and other similar requirements to ensure pedestrian safety. The Project does not propose any bus, van, or shuttle loading facilities. Improving bus transit for the Project Site (i.e. Shuttle/Access, DASH, and Metro Bus Route 252) is outside the scope of the project. The Project Site has no publicly accessible throughways, and no bicycle paths are directly adjacent to the site (Google Earth Pro, 2018). **During construction activities, the Project has the potential to affect sidewalk accessibility. However,**

with implementation of mitigation measure TRANS-3, impacts would be reduced to a less than significant level. Therefore, with mitigation the Project would not conflict with policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities and impacts would be less than significant. (Draft EIR, p. 4.12-30.)

TRANS 1 ***Prior to the commencement of Project construction, the Project Applicant for the Project will submit a detailed Construction Management Plan (with copy to HACLA) to be reviewed and approved by LADOT. In the Construction Management Plan, it will specify that the Construction Manager will schedule truck traffic and employee shifts to avoid creating trips during the peak traffic periods, as is feasible for construction operations. All measures including identified truck routes and designated employee parking areas must be included in the Construction Management Plan.***

TRANS-2 ***Prior to issuance of a demolition permit, the Project applicant shall submit a construction parking management plan to the City of Los Angeles (with copy to HACLA) that details how parking will be managed during Phase I and Phase II of Project construction. The parking management plan shall specify where onsite and offsite parking will be available during both phases of Project construction. This plan shall be made available to the City in both hard copy and electronic format so that it can be disseminated to persons who request this information during construction of the project.***

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

2. Emergency Access

Threshold: Does the Project result in inadequate emergency access?

Finding: Less than significant with mitigation. (Draft EIR, p. 4.12-32.)

Explanation: **Emergency Access – Project Construction**

Based on the number of trips estimated to be generated during Project demolition and construction activities, delivery truck trips and construction employee commuting could significantly contribute to traffic within the study area (KOA, 2019, p. 29), which could in turn impact emergency access to the Project Site. The construction trip generation intensities will vary based on the construction phase, truck hauling patterns, and construction employment intensities. During the peak traffic period some

locations in the study area may be affected by construction traffic, especially the intersection of Monterey Road and Huntington Drive, where for future conditions without the proposed Project the AM peak-hour LOS is E and the PM peak-hour LOS is D (KOA, 2019, p. 29). (Draft EIR, p. 4.12-32.)

The TIA prepared for the Proposed Project states: "It is recommended that the construction manager schedules truck traffic and employee shifts to avoid creating trips during the peak traffic periods, as is feasible for construction operations. All measures including identified truck routes and designated employee parking areas must be detailed within a Construction Management Plan to be reviewed and approved by LADOT before the start of construction. These measures would reduce construction impacts on the area roadway network (KOA, 2019, p. 29). Mitigation Measure **TRANS-1** pertains to the scheduling of truck traffic and employee shifts to avoid creating trips during the peak traffic periods. Mitigation Measure **TRANS-1** would reduce construction impacts on the area roadway network (KOA, 2019, p. 29). **Mitigation measure TRANS 1 would reduce this potential impact to the intersection of Monterey Road and Huntington Drive to a less than significant level**. (Draft EIR, p. 4.12-32.)

Emergency Access – Project Operation

The Project site plan will be reviewed by the Los Angeles Fire Department and the Project complies with all emergency access and sight line requirements. **Therefore, the Project would not result in inadequate emergency access during operation and no impacts would occur.** (Draft EIR, p. 4.12-32.)

SECTION IV
IMPACTS THAN CANNOT BE FULLY MITIGATED TO A LESS THAN SIGNIFICANT LEVEL

The Board of Commissioners finds that, despite the incorporation of Mitigation Measures identified in the EIR and in this Resolution, the following environmental impacts cannot be fully mitigated to a less than significant level and a Statement of Overriding Considerations is therefore included herein:

A. AESTHETICS

1. Scenic Resources

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

Finding: Significant and unavoidable. (Draft EIR, p. 4.1-14.)

Explanation: Rose Hill Courts originated as a public housing complex developed by HACLA in 1942. The complex was formally determined eligible for listing in the National Register of Historic Places (NRHP) as a historic district in

2003 through the federal review process under Section 106 of the National Historic Preservation Act. As such, it was automatically listed in the California Register of Historical Resources (CRHR). Properties that are listed in the CRHR are defined by CEQA as historic resources. Since the existing Rose Hill Courts complex is listed in the CRHR because the buildings are historic, the historic building complex is therefore considered to be a scenic resource. (Draft EIR, p. 4.1-14.)

The Project Site is not located along or within a state scenic highway. The closest officially designated scenic highway is State Route 110 (Arroyo Seco Historic Parkway) located approximately one mile to the east of the Project Site. Furthermore, the Project Site is surrounded by steep hills to the east and the northeast, which obstruct views to and from the Arroyo Seco Scenic Parkway. As such, the existing historic buildings on the site are not considered a scenic resource within a state scenic highway. The Project would be consistent with the City's General Plan (2035) and Zoning Ordinances which impose development guidelines and standards to preserve scenic resources and reduce the obstruction of public views from locally designated scenic highways. Therefore, no impact would occur to scenic resources specifically within a state scenic highway and no mitigation would be required for impacts to scenic resources within a state scenic highway. (Draft EIR, p. 4.1-14.)

However, although the Project Site is not located within a state scenic highway, it is considered a scenic resource since the buildings are historic. The proposed demolition of the existing buildings would substantially damage a scenic resource, which would be considered a significant adverse impact. Mitigation measures **CUL-1** and **CUL-2** would be implemented to comply with CEQA regarding historic cultural resources. However, in most circumstances, the demolition of a historic resource cannot be mitigated to a less than significant level. **Therefore, impacts, after implementation of mitigation measures, to aesthetics with regards to the historic buildings (and thus a scenic resource) would remain significant and unavoidable.** (Draft EIR, p. 4.1-14; Final EIR, p. III-11.)

CUL 1: ***The Project Applicant shall prepare an interpretive display and install it in the new community building on the redeveloped Rose Hill Courts property. The interpretive display shall be completed to coincide with the opening of the community building once construction is complete. It shall include a brief history of the historic property, its significance in the contexts of public and defense worker housing in Los Angeles during the Second World War and public housing design related to the Garden City and Modern movements, and a description of the Undertaking which led to the demolition of the historic property. The display shall be professionally written, illustrated, and designed. The content shall be prepared by persons meeting the Secretary of the Interior's (SOI) Professional Qualifications Standards for History or Architectural History. HCID shall ensure that the Project Applicant has satisfactorily completed the interpretive display as described in this***

stipulation and submit the draft content to SHPO for review and approval. SHPO shall have 30 days to review the interpretive display content before it is produced and installed. (This is Project PA Stipulation I.A.)

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

B. CULTURAL RESOURCES

1. Historical Resources

Threshold: Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

Finding: Significant and unavoidable. (Draft EIR, pp. 4.4-28—4.4-31.)

Explanation: The Rose Hill Courts apartment complex itself was formally determined eligible for listing on the NRHP as a historic district in 2003, and therefore it was automatically listed in the CRHR (Grimes, 2015). Properties that are listed in the CRHR are historical resources as defined by CEQA. An assessment of potential adverse effects to the property has been prepared separately (GPA Consulting, 2018), and recommendations to mitigate the adverse effect of the project to this historic property have been made by GPA (2018:32-33). (Draft EIR, p. 4.4-28.)

The project will involve the demolition of the existing Rose Hill Courts public housing complex. In most circumstances, the demolition of a historical resource cannot be mitigated to a less than significant level. Therefore, the project would have a significant adverse impact on this historical resource. (Draft EIR, p. 4.4-28.)

The GSA Historic Resource Technical Report determined that "…there is no potential for the Project to result in indirect impacts on historical resources in the vicinity" (2018:29). This determination was made on the basis that, while the Rose Hill Courts is surrounded on all four sides by a

number of structures and features including Earnest E. Debs Regional Park, Rose Hill Recreation Center, Our Lady of Guadalupe School, as well as single family and multi-family residential developments, none of these properties have been previously identified or recorded as significant in a historical resources survey (2018:29). (Draft EIR, p. 4.4-28.)

As the Project would involve the demolition of the existing Rose Hill Courts public housing complex, the significance of Rose Hill Courts would be materially impaired by the Project because it would no longer be listed in the CRHR or eligible for listing in the NRHP if it were demolished. **Therefore, the Project would have a significant adverse impact on this historical resource.** (Draft EIR, p. 4.4-28.)

The Project PA approved by SHPO implements stipulations to take into account the effect of the project on potential historic properties, and outlines actions to be taken if historical or cultural deposits are discovered during project construction. These stipulations are summarized below: (Draft EIR, p. 4.4-28; Final EIR, pp. III-6 to III-10.)

Stipulation I. ADDRESSING ADVERSE EFFECTS OF THE UNDERTAKING ON HISTORIC ARCHITECTURAL PROPERTIES (Draft EIR, p. 4.4-29.)

A. Related shall prepare an interpretive display and install it in the new community building on the redeveloped Rose Hill Courts property. The interpretive display shall be completed to coincide with the opening of the community building once construction is complete.

B. HACLA shall add to its existing website a section dedicated to the history of HACLA and public housing in Los Angeles within six (6) months from the issuance of the Certificate of Occupancy for the Project..

Stipulation II. STANDARDS FOR ARCHAEOLOGY AND HISTORIC PRESERVATION (Draft EIR, p. 4.4-29.)

All actions prescribed by this Project PA that involve the identification, evaluation, analysis, recordation, treatment, monitoring, and disposition of historic properties and that involve the reporting and documentation of such actions in the form of reports, forms or other records, shall be carried out by or under the direct supervision of a person or persons meeting, at a minimum, the Secretary of the Interior's Professional Qualifications Standards (PQS), for the appropriate discipline (48 FR 44739, September 29, 1983). Tribal consultants who are available to perform monitoring duties are assigned and approved by each Tribal Organization. All preservation activities carried out pursuant to this Project PA shall meet the Secretary of the Interior's Standards for Archeology and Historic Preservation (48 FR 44716-44740, September 29, 1983).

Stipulation III. ARCHAEOLOGICAL TESTING AND EVALUATION PROGRAM (Draft EIR, pp. 4.4-29—4.4-30.).

A. The archaeological testing and evaluation program shall be conducted in accordance with the Archaeological Testing Plan (ATP), which is included as Attachment A to this Project PA..

B. The purpose of the ATP will be to determine the extent and possible presence/absence of archaeological resources and to identify whether the resources constitute an historical property using the criteria of the NRHP.

C. At the completion of the ATP, the Project Archaeologist and Staff Archaeologists shall submit a written report of the findings.

D. If the Project Archaeologist determines that a significant archaeological resource is present and that the resource could be adversely affected by the project, at the discretion of the project sponsors either:

- The proposed project shall be re-designed as to avoid any adverse effects; or
- A data recovery program shall be implemented.

E. Archaeological Data Recovery Program

- The scope of the ADRP shall include the following elements:
  - Field Methods and Procedures.
  - Cataloguing and Laboratory Analysis.
  - Discard and Deaccession Policy.
  - Interpretive Program.
  - Security Measures.
  - Final Report.
  - Curation.

F. Evaluation of Archaeological Resources. HCID shall use the NRHP criteria for evaluating the significance of the archaeological properties. If resources are discovered that the Project Archaeologist determines meet the significance criteria of NRHP Criterion D, and if preservation in place is not feasible, an ADRP shall be implemented in accordance with this PA. If resources are found to meet NRHP criteria A and/or B and/or C, then representatives of the appropriate descent community or the appropriate community members shall be notified upon the determination.

G. Archaeological Monitoring Program (AMP). The Project Archaeologist shall determine what project activities shall be archaeologically monitored. Archaeological Monitor(s), including a Native American Monitor under the supervision of the Project Archaeologist, shall be present and reasonably compensated for their monitoring services on the project site according to a schedule agreed upon by the Project Archaeologist until the Project Archaeologist determines that ground-disturbing activities are complete.

H. Final Archaeological Resources Report.

- The report shall evaluate the historical significance of any discovered archaeological remains and shall describe the research methods employed in the testing, monitoring, and data recovery programs undertaken. Information that may put at risk any archaeological resource shall be provided in a separate removable insert within the final report.

- Once approved by the Project Archaeologist, SHPO, and the project sponsors, copies of the FARR shall be distributed to local repositories.

Stipulation IV. CONSULTATION WITH DESCENDANT COMMUNITIES (Draft EIR, pp. 4.4-30—4.4-31.)

On discovery of archaeological material associated with descendant Native Americans or other potentially interested descendant group(s), appropriate representatives of the descendant groups and the Project Archaeologist shall be contacted. Representative(s) of the descendant group(s) shall be given the opportunity to monitor archaeological field investigations of the material and to consult with the Project Archaeologist regarding appropriate treatment of the material, of the recovered data, and, if applicable, any analysis, interpretative treatment, cataloguing, curation, reporting, and/or repatriation of the archaeological material.

Stipulation V. TREATMENT OF HUMAN REMAINS OF NATIVE AMERICAN ORIGIN (Draft EIR, p. 4.4-31.)

If human remains are discovered at any time during the implementation of the Undertaking, HCID, the Project Archaeologist and the project sponsors shall follow the provisions of California Health and Human Safety Code § 7050.5. This includes immediate notification of the Los Angeles County Coroner, and in the event of the Coroner's determination that the human remains are prehistoric Native American remains, notification of the California State NAHC.

Stipulation VI. DISCOVERIES AND UNANTICIPATED EFFECTS (Draft EIR, p.4.4-31.)

If HCID determines after construction of the Undertaking has commenced, that the project will affect a previously unidentified property

or affect a known historic property in an unanticipated manner, HCID will address the discovery or unanticipated effect in accordance with 36 CFR §800.13(b)(3).

Based on the analysis above, impacts on historical resources from the proposed project would be significant and unavoidable. Rose Hill Courts is a historical resource because it was formally determined eligible for listing in the NRHP and therefore is automatically listed in the CRHR. Demolition of the existing Rose Hill Courts would cause a substantial adverse change in the significance of a historical resource. Furthermore, after implementation of mitigation measures CUL-1 and CUL-2, impacts on historical resources would remain significant and unavoidable. Though the above measures in the Programmatic Agreement would reduce impacts related to demolition of Rose Hill Courts, no mitigation measures are available for the proposed project that would fully reduce impacts on historical resources to a less than significant level. Therefore, this impact would be significant. (Draft EIR, p. 4.4-31.)

C. NOISE

1. Noise Standards

Threshold: Would the Project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Finding: Significant and unavoidable. (Draft EIR, pp. 4.9-16—4.9-17.)

Explanation: **Construction Impacts**

Noise impacts associated with the housing Project demolition and construction include short term impacts. Noise impacts associated with Project operations would be long term impacts. Construction activities, especially heavy equipment operation, would create noise effects on and adjacent to the construction site. Long term noise impacts include Project generated onsite and offsite operational noise sources. Onsite (stationary) noise sources would include operation of mechanical equipment such as air conditioners, landscape and building maintenance. Offsite noise would be attributable to Project induced traffic, which would cause an incremental increase in noise levels within and near the Project vicinity. (Draft EIR, p. 4.9-16.)

The combinations of pieces of equipment in all subphases of construction would result in short term increases in exposures of nearby sensitive receivers of more than 5 dBA. In Phase I, the increase over ambient would range from 13.1 to 37.3 dBA Leq. In Phase II, the increase would range from 23.3 to 40.2. These increases would exceed the 5-dBA

significance threshold at all receptors for both phases. (Draft EIR, p. 4.9-16.)

Mitigation measures N-1 through N-5 would result in an appreciable decrease in exposures, but these short term exposures would still be significant sometimes during construction. Therefore, Project impacts related to increased noise levels during construction would be significant and unavoidable after mitigation. (Draft EIR, p. 4.9-16.)

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

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

- ***Use of noise producing equipment will be limited to the interval from 8:00 a.m. to 5:00 p.m., Monday through Friday.***

- ***For all noise producing equipment, use types and models that have the lowest horsepower and the lowest noise generating potential practical for their intended use.***

- ***The construction contractor will ensure that all construction equipment, fixed or mobile, is properly operating (tuned up) and lubricated, and that mufflers are working adequately.***

- ***Have only necessary equipment on site.***

- ***Use manually adjustable or ambient sensitive backup alarms.***

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

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

- ***Temporarily enclose localized and stationary noise sources.***

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

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

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

SECTION V
CUMULATIVE IMPACTS

The Board of Commissioners finds as follows:

A. AESTHETICS

There are seven related projects that were considered in the cumulative analysis for the proposed Project. The related projects generally consist of infill development including apartments, single family homes, mixed use, retail, office and school uses (KOA, 2019). Similar to the proposed Project, the cumulative projects would be required to comply with relevant policies and regulations related to aesthetics and would be subject to CEQA review. Although there are no known related projects involving historical resources within a similar context or property type as Rose Hill Courts, it is reasonably foreseeable that HACLA could redevelop, partially redevelop, or significantly rehabilitate other public housing complexes in the future. If those public housing projects were historical resources, the project could potentially contribute to cumulative impacts on historical resources (GPA Consulting, 2018, p. 1). Because historical buildings are considered scenic aesthetic resources, the proposed Project, when considered with other potential projects, would have a significant cumulative impact on historical resources. HACLA will implement mitigation measures **CUL-1** and **CUL-2** to comply with CEQA regarding historic cultural resources. But the mitigation measures would not reduce potentially significant impacts on built environment resources to a less than significant level. As a result, impacts after implementation of mitigation measures to aesthetics with regards to the historic buildings would remain significant and unavoidable. **Therefore, implementation of the proposed Project along with the cumulative projects considered for the purpose of this analysis would have cumulatively significant aesthetic impacts regarding historical resources**. (Draft EIR, p. 4.1-18.)

B. AGRICULTURE AND FORESTRY RESOURCES

The project would have no impact on agriculture and forestry resources, as neither resource is located within the Project site. (IS, pp. 4.2-1—4.2-3.) **No cumulative impact would occur.**

C. AIR QUALITY

According to the CEQA Guidelines, a lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved air quality attainment or maintenance plan. The Project would not exceed any of the SCAQMD daily criteria pollutant thresholds. In general, cumulative regional impacts of construction and operation of all projects in the SCAB at any given time are accounted for in the AQMP. The proposed Project is compliant with the AQMP, so **the incremental contribution of the project would not be cumulatively considerable**. (Draft EIR, p. 4.2-30—4.2-31.)

Based on SCAQMD guidance, individual construction projects that exceed the recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment. As shown above, construction-related daily emissions at the Project Site would not exceed any of SCAQMD's regional or localized significance thresholds including NOX, CO, PM10 and PM2.5 **Therefore, the Project's contribution to cumulative air quality impacts due to localized emissions would not be cumulatively considerable and, therefore, would be less than significant.** (Draft EIR, p. 4.2-31.)

While diesel particulate matter and other TACs are emitted during construction, the duration of exposure would not be sufficient to result in a significant cancer risk or noncancer health risk. TAC emissions from operations would be negligible. **The incremental contribution of the Project would not be cumulatively considerable.** (Draft EIR, p. 4.2-31.)

Finally, odors from project operations will be typical of those from residential areas, and will not differ from those under baseline conditions. **The incremental contribution of the Project would not be cumulatively considerable**. (Draft EIR, p. 4.2-31.)

D. BIOLOGICAL RESOURCES

The Project Site is located in a highly urbanized setting which provides low habitat value for special status plant and wildlife species. The literature review and reconnaissance biological survey conducted in May 2018 assessed that the Project Site contains structures, sidewalks, and multiple paved surface areas with impervious surfaces that lacks suitable soils, biological resources, and physical features to support any candidate, sensitive, or special status plant and animal species. The Project has the potential to impact migratory non game breeding birds, and their nests, young and eggs. With implementation of mitigation measures **BR 1** and **BR 2**, potential impacts would be reduced to less than significant levels. After implementation of mitigation, cumulative impacts on nesting birds would be less than significant. (Draft EIR, p. 4.3-16.)

E. CULTURAL RESOURCES

Historic Architectural Resources

The project would involve the demolition of the existing Rose Hill Courts public housing complex. Rose Hill Courts is a historical resource because it was formally determined eligible for listing in the National Register and is listed in the California Register. After implementation of Programmatic Agreement Stipulation I, the project would have a significant and unavoidable impact on historical resources. (Draft EIR, p. 4.4-33.)

No prehistoric or historic archaeological resources were observed during the pedestrian field survey. The previous cultural resources surveys within the half mile buffer zone resulted in no archaeological sites or isolates being recorded and one historic structure outside the Project Site. The fully built environment of the Project Site and elevation relative to adjacent roads suggests that ground here has been significantly cut and fill, with little original surface soil remaining. (Draft EIR, p. 4.4-33.)

The potential for cumulative impacts from the Project were also considered. (Draft EIR, p. 4.4-33.)

GPA determined that, "including Rose Hill Courts, there are at least 34 public and private garden apartment complexes in Los Angeles, … (and that many) of the complexes are listed or identified as eligible for listing in a historical resources survey" (2018:30). Rose Hill Courts was one of the first ten projects constructed by HACLA, the others being Ramona Gardens, Pico Gardens, Pueblo del Rio, Rancho San Pedro, Aliso Village, Estrada Courts, William Mead Homes, Avalon Gardens, and Hacienda Village (now Gonzaque Village). HACLA currently has no planned projects for its other garden apartment complexes. Its "Vision Plan" identifies several for possible redevelopment and significant rehabilitation/partial redevelopment based upon the scoring criteria. As the Vision Plan is a long-range plan to preserve and expand affordable housing over the next 25 years, it is reasonably foreseeable that one or more of the HACLA complexes … could be redeveloped, partially redeveloped, and/or significantly rehabilitated" (GPA 2018:30). (Draft EIR, p. 4.4-33.)

GPA Consulting (2018:1) concluded that the proposed project when considered with other potential projects would have a significant cumulative impact on historical resources. Although, as stated above, there are no known related projects involving historical resources within a similar context or property type as Rose Hill Courts, it is reasonably foreseeable that HACLA could redevelop, partially redevelop, or significantly rehabilitate other public housing complexes in the future. If those public housing projects were historical resources, the project could potentially contribute to cumulative impacts on historical resources (GPA Consulting, 2018, p. 1). **Therefore, impacts on historical resources would be significant and cumulatively considerable**. (Draft EIR, p. 4.4-33.)

Archaeological Resources

With regard to potential cumulative impacts related to archaeological resources and human remains, the Project is located in an urbanized area that has been disturbed and developed over time. In the event that archaeological resources are uncovered, each related project would be required to comply with applicable regulatory requirements. In addition, as part of the environmental review process for the related projects, it is expected that mitigation measures would be established as necessary to address the potential for uncovering archaeological resources. **Therefore, cumulative impacts on archaeological resources would be less than significant and would not be cumulatively considerable**. (Draft EIR, p. 4.4-33—4.4-34.)

Human Remains

No known traditional burial sites or other type of cemetery usage has been identified within the Project Site or in the vicinity. In addition, as previously indicated, the Project Site is developed with 15 buildings. The planned development would require some excavation that would extend into native soils. Thus, the potential exists to encounter human remains during

excavation activities. Any of the related projects requiring excavation would also raise the potential to encounter human remains. A number of regulatory provisions address the handling of human remains inadvertently uncovered during excavation activities. These include State Health and Safety Code § 7050.5, PRC § 5097.98, and State CEQA Guidelines § 15064.5(e). Implementation of these provisions in the event of the inadvertent discovery of human remains would reduce potential impacts on a less than significant level. **Since the Project is required to comply with these provisions, its cumulative impacts on human remains would be less than significant**. (Draft EIR, p. 4.4-33.)

F. GEOLOGY AND SOILS

Geology and Soils

There are seven related projects that were considered in the cumulative analysis for the proposed Project. The related projects generally consist of infill development including apartments, single family homes, mixed use, retail, office and school uses (KOA, 2019). Similar to the proposed Project, the related projects would be required to be designed and constructed in conformance with current building codes and engineering practices including City building and foundation design regulations such as California State Building Code (Title 24) and requirements from State of California's Department of General Services, Division of the State Architect (DSA). As required by the California State Building Code (Title 24), related projects would also require a structural engineer to evaluate any proposed structures for anticipated seismically-induced settlements and deformations to ensure they would support potential gravity loads. Seismic building code requirements such as this would be implemented to reduce potential impacts due to settlement and seismic activity to less than significant. (Draft EIR, p. 4.5-36.)

Construction and implementation of the Project has the potential to temporarily increase erosion of soils through ground disturbance. However, this impact is anticipated to be short term and minor, due to the implementation of erosion and sediment control BMPs. The Project also has the potential to expose a greater number of people to a seismically hazardous area by allowing a larger population to live on the Project site (compared to existing conditions); however, this potential risk is ubiquitous throughout southern California and construction and implementation of the Project would not add to the cumulative potential impacts on the population, from exposure to seismic hazards. With implementation of mitigation measure **GEO-1**, Project impacts associated with geology and soils would be less than significant. Construction and implementation of the Project is not anticipated to add to the cumulative potential risks of geologic hazards to the people within the region. **Therefore, no cumulative impacts related to geology and soils are anticipated**. (Draft EIR, pp. 4.5-36—4.5-37.)

Paleontological Resources

Ground-disturbing activities such as grading and excavation during construction of the proposed Project may result in adverse impacts to paleontological resources if they were encountered during construction. All related projects would be subject to the same requirements of CEQA and relevant legislation that affords protection to paleontological resources. With implementation of mitigation measure **PALEO-1**, the proposed Project would have a less-than-significant impact to paleontological resources and **therefore, a less-than-significant cumulative impact to paleontological resources**. (Draft EIR, p. 4.5-37.)

G. GHG EMISSIONS

It is widely recognized that no single project could generate enough GHG emissions to noticeably change the global climate. However, the combination of GHG emissions from past, present, and future projects could contribute substantially to global climate change. Thus, Project specific GHG emissions should be evaluated in terms of whether they would result in a cumulatively significant impact on global climate change. Climate change impacts may include an increase in extreme heat days, higher concentrations of air pollutants, sea level rise, impacts on water supply and water quality, public health impacts, impacts on ecosystems, impacts on agriculture, and other environmental impacts. (Draft EIR, pp. 4.6-29—4.6-30.)

The Project will result in lower GHG emissions per capita than it has now. In addition, the Project is consistent with state and local plans and programs to reduce state and regional GHG emissions, including the ARB's AB 32 Scoping Plan (and updates thereto), the 2016 2040 Regional Transportation Plan/Sustainable Communities Strategy, and the LA Green Plan/ClimateLA. The Project's incremental contribution to GHG emissions and their effects on climate change would not be cumulatively considerable. **For these reasons, the Project's cumulative contribution to global climate change is less than significant**. (Draft EIR, p. 4.6-30.)

H. HAZARDS AND HAZARDOUS MATERIALS

Construction and operation of the Project would involve transport, storage, and use of chemical agents, solvents, paints, and other hazardous materials. Chemical transport, storage, and use would comply with RCRA; CERCLA; OSHA; California hazardous waste control law; Division of OSHA; SCAQMD; Los Angeles County Department of Public Health; and City of LAFD requirements. Construction, onsite maintenance, and operation of the Project would involve storage and use of small amounts of commercially available janitorial and landscaping supplies. These materials would be used, stored, handled, and disposed of in accordance with applicable regulations. It is anticipated that future projects would be required to comply with these applicable regulations and thus cumulative impacts regarding hazardous materials from future projects wouldn't be cumulatively considerable. With implementation of mitigation and compliance with applicable laws, the Project would result in less than significant impacts regarding hazards and hazardous materials and the Project's contribution would be cumulatively less than considerable. **Therefore, the Project would have less than significant cumulative impacts regarding hazards and hazardous materials**. (Draft EIR, pp. 4.7-14—4.7-15.)

I. HYDROLOGY AND WATER QUALITY

The project will have less than significant impacts on hydrology and water. (IS, pp. 4.9-1—4.9-2.) **Therefore, cumulative impacts to hydrology and water quality would not be cumulatively considerable**.

J. LAND USE AND PLANNING

There are seven related projects that were considered in the cumulative analysis for the Project. The related projects generally consist of infill development including apartments, single family homes, mixed use, retail, office and school uses (KOA, 2019). Similar to the Project, the cumulative projects would be required to comply with relevant land use policies and regulations and would be subject to CEQA review. The Project would be consistent with goals, objectives and policies contained in existing planning documents that regulate land use and development in the Project area. The Project would not incrementally contribute to cumulative inconsistencies with respect to land use plans and development standards. Implementation of the Project along

with the cumulative projects considered for the purpose of this analysis would not have cumulatively significant land use impacts. **Therefore, cumulative impacts related to land use and planning would be less than significant and would not be cumulatively considerable.** (Draft EIR, pp. 4.8-39—4.8-40.)

K. MINERAL RESOURCES

The project would not result in the loss of availability of any known mineral resources. (IS, pp. 4.11-1—4.11-4.) **Therefore no cumulative impact would occur**.

L. NOISE

Cumulative construction impacts could occur if other construction projects were active concurrently with development of the proposed Project, and near enough so that noise from two or more projects were perceived by the same sensitive receivers. However, the area surrounding the Project Site is almost completely built out, and there is limited space for new development. Currently, there are no planned or reasonably foreseeable future projects that could generate additional construction noise in the immediate Project vicinity. **Therefore, cumulative construction noise impacts would be less than significant.** (Draft EIR, p. 4.9-20.)

M. POPULATION AND HOUSING

To determine the cumulative effects of the Project, this section includes a review of past, present, and reasonably foreseeable future projects in the vicinity of the Project area and provides an analysis of their short and long term incremental effects on the local environment. The combined, incremental effects of human activity, referred to as cumulative impacts, accumulate over time, from one or more sources, and can result in the degradation of important resources. The cumulative projects taken into consideration are those that were accounted for in the traffic impact analysis for the Project. Figure 4.10-1 of the Draft EIR shows the location of cumulative projects. Those projects are included as Attachment E to Appendix O of the Draft EIR document. (Draft EIR, p. 4.10-10.)

The estimated population resulting from the cumulative projects listed above was calculated using the Citywide Person Per Household factor of 2.83 as published in Census Quickfacts for the City of Los Angeles (2013-2017) (Census Quickfacts, 2019). Based on the table above, there are a total of 157 dwelling units. 157 units multiplied by 2.83 persons per household results in an estimated cumulative increase in population of approximately 435 persons. This number of persons was accounted for in the City of Los Angeles General Plan and therefore, the Project's anticipated population combined with the anticipated population of cumulative projects would be less than significant. (Draft EIR, p. 4.10-10.)

The Project is located in an urban and developed area. The Project Site can be accessed using the existing street system and the Project Site is served by existing utilities and infrastructure. The Project would nearly double the number of housing units onsite (100 existing compared to 185 proposed) and would not require the construction of replacement housing elsewhere due to temporary relocation of tenants. Before any tenant relocation occurs, HACLA must approve the Project's relocation plan, which is currently under development (49 CFR 24 Subpart C). Consistent with HUD regulations for the treatment of itinerants, current residents who are in good standing will have the option to return to the property after construction is

complete. **Therefore, the Project would have less than significant cumulative impacts related to population and housing.** (Draft EIR, p. 4.10-10.)

N. PUBLIC SERVICES AND FIRE PROTECTION

There are seven related projects that were considered in the cumulative analysis for the proposed Project. The related projects generally consist of infill development including apartments, single family homes, mixed use, retail, office and school uses (KOA, 2019). Similar to the proposed Project, the cumulative projects would be required to comply with relevant land use policies and regulations and would be subject to CEQA review. The Project would be consistent with applicable federal, state and local standards and regulations related to fire protection services and facilities in the City of Los Angeles. (Draft EIR, p. 4.11.a-7.)

Implementation of the proposed Project along with the cumulative projects considered for the purpose of this analysis would not have cumulatively significant impacts related to fire protection services and facilities. **Therefore, cumulative impacts related to fire protection services would be less than significant and would not be cumulatively considerable**. (Draft EIR, p. 4.11.a-7.)

O. POLICE PROTECTION

There are seven related projects that were considered in the cumulative analysis for the proposed Project. The related projects generally consist of infill development including apartments, single family homes, mixed use, retail, office and school uses (KOA, 2019). Similar to the proposed Project, the cumulative projects would be required to comply with relevant federal, state and local standards, policies and regulations and would be subject to CEQA review. The Project would be consistent with applicable standards and regulations that regulate the provision of police protection services and facilities in the City of Los Angeles. (Draft EIR, p. 4.11.b-5.)

In response to public comments regarding safety, security and crime prevention, implementation of mitigation measures **PS 1** and **PS-2** would enhance the safety of the Project Site and would result in less than significant impacts on police protection and law enforcement services. (Draft EIR, p. 4.11.b-6.)

Implementation of the proposed Project along with the cumulative projects considered for the purpose of this analysis would not have cumulatively significant impacts related to police protection services. **Therefore, cumulative impacts related to police services would be less than significant and would not be cumulatively considerable**. (Draft EIR, p. 4.11.b-6.)

P. SCHOOLS

There are seven related projects that were considered in the cumulative analysis for the proposed project. Of the seven related projects, none were identified as being located within the attendance boundaries of Glen Alta Elementary School and six were identified as being within the attendance boundaries of Abraham Lincoln Senior High School and Woodrow Wilson Senior High School. Therefore, these six related projects are considered in this cumulative analysis as these related projects would have the potential to combine with the Project and cumulatively generate new students who would attend Abraham Lincoln High School and Woodrow Wilson Senior High School. (Draft EIR, p. 4.11.c-14.)

As shown in Table 4.11.c-4 of the Draft EIR, the seven cumulative projects located within the attendance boundaries of the same schools that would serve the Project could potentially generate no Glen Alta Elementary School students, 70 Abraham Lincoln High School students and 70 Woodrow Wilson Senior High School students, based on the rates provided by LAUSD staff in the 2018 LAUSD Developer Fee Justification Study for LAUSD. The Project would generate approximately 39 net new students consisting of 21elementary school students, six middle school students, and 12 high school students. Therefore, the Project in combination with the seven cumulative projects would have the potential to generate a cumulative total of 27 Glen Alta Elementary School students and 152 high school students. (Draft EIR, p. 4.11.c-18.)

Based on existing enrollment and capacity data from LAUSD, the schools serving the Project and the seven cumulative projects would not have adequate capacity. Specifically, with the addition of students generated by the Project in combination with the seven related projects, Glen Alta Elementary School would have a seating shortage of 70 students (i.e., existing seating shortage of 43 students in addition to a net increase of 27 students from the proposed project). The cumulative (i.e. related) projects would not generate new students because none of the seven projects fall within the attendance boundaries for Glen Alta Elementary School. Wilson High School and Abraham Lincoln High School would have a seating shortage of 825 students (i.e. existing seating shortage of 673 seats in addition to the Project's 12 students, plus related project's student generation of 140 students. (Draft EIR, p. 4.11.c-18.)

With regard to projected future capacity, Glen Alta Elementary School would have a seating shortage of 47 students (i.e., future seating shortage of 20 students in addition to the 27 students generated by the Project) but no additional students are anticipated from the related projects. Abraham Lincoln High School would not have a seating shortage and Woodrow Wilson Senior High School would not have a seating shortage. Therefore, the students generated by the Project in combination with the seven cumulative projects located within the school attendance boundaries would not cause a shortage when compared to existing conditions and projected school capacity at Glen Alta Elementary School, Abraham Lincoln High School, and Woodrow Wilson Senior High School. (Draft EIR, p. 4.11.c-18.)

Cumulative growth would increase the demand for LAUSD school services in the vicinity of the Project Site. However, the Project is estimated to comprise a small percentage (approximately 6.7 percent) of the total estimated cumulative growth in students. Pursuant to SB 50, future development, including cumulative/related projects, would be required to pay development impact fees for schools to the LAUSD. Pursuant to Government Code § 65995, the payment of school impact fees would be considered full and complete mitigation of school impacts generated by cumulative/related projects. Therefore, the Project-level and cumulative impacts related to schools would be less than significant. Therefore, no mitigation measures for schools would be necessary. (Draft EIR, p. 4.11.c-18.)

There are seven related projects that were considered in the cumulative analysis for the proposed project. The related projects generally consist of infill development including apartments, single family homes, mixed use, retail, office and school uses (KOA, 2019, Attachment F). Similar to the proposed project, the cumulative projects would be required to comply with relevant land use policies and regulations and would be subject to CEQA review. (Draft EIR, p. 4.11.c-18.)

Implementation of the proposed project along with the cumulative projects considered for the purpose of this analysis would not have cumulatively significant impacts related to schools.

Therefore, cumulative impacts related to schools would be less than significant and would not be cumulatively considerable. (Draft EIR, p. 4.11.c-18.)

Q. RECREATION AND PARKS

There are seven related projects that were considered in the cumulative analysis for the proposed Project. The related projects generally consist of infill development including apartments, single family homes, mixed use, retail, office and school uses (KOA, 2019). Similar to the proposed Project, the cumulative projects would be required to comply with relevant land use policies and regulations and would be subject to CEQA review. The Project would be consistent with standards and regulations contained in existing planning documents that regulate the provision of parks and recreation facilities in the City of Los Angeles. (Draft EIR, p. 4.11.d-14.)

Given the proximity of the Project to Rose Hill Recreation Center and Ernest E. Debs Regional Park, extraordinary care would be taken to limit construction impacts and protect access to those parks. Mitigation Measure **PS 3** would reduce potential impacts on nearby park/recreation access to a less than significant level. (Draft EIR, p. 4.11.d-14.)

Implementation of the proposed Project along with the cumulative projects considered for the purpose of this analysis would not have cumulatively significant impacts related to park and recreation services. **Therefore, cumulative impacts related to recreation and parks facilities would be less than significant and would not be cumulatively considerable**. (Draft EIR, p. 4.11.d-15.)

R. LIBRARIES

There are seven cumulative projects that were considered in the cumulative analysis for the proposed Project. The cumulative projects generally consist of infill development including apartments, single family homes, mixed use, retail, office and school uses (KOA, 2019). As mentioned in the response letter received from LAPL, any increase in the residential population that is in close proximity to a library has a direct impact on library services. The LAPL does not specify any facilities criteria based on employment in a library's service area. Employees generated by the non-residential cumulative projects would be more likely to use library facilities near their places of residence. Students and staff generated by the educational cumulative projects would be more likely to utilize library services provided by the educational facilities. Therefore, the non-residential cumulative projects would not substantially contribute to the Project's cumulative demand for library services. (Draft EIR, p. 4.11.e-6.)

The estimated population resulting from the cumulative projects was calculated using the Citywide Person Per Household factor of 2.83 as published in Census Quickfacts for the City of Los Angeles (2013-2017) (Census Quickfacts, 2019). Based on the cumulative projects considered for cumulative impact analysis in the draft EIR, a total of 157 dwelling units are proposed near the Project Site, in the future. 157 units multiplied by 2.83 persons per household (Census Quickfacts, 2019) results in an estimated cumulative increase in population of approximately 435 persons. When combined with the proposed Project's estimated 435 net new residents, the cumulative projects and the Project would add a total of 880 persons to the Project area. Realistically, the new residents would utilize one of the three libraries (refer to Table 4.11.e-1 above) based on the location of the cumulative project sites relative to the location of the three libraries. Taking a more conservative approach for the purpose of this analysis, and assuming that all the 880 new residents would utilize the El Sereno Branch Library

(which is located closest to the Project Site), rather than being distributed among all three nearby libraries, the service population of the El Sereno Branch library would increase to 24,134. This would still be below the design capacity criterion for the El Sereno Branch library facility and would not trigger the LAPL Branch Facilities Plan threshold (e.g., a service population of 90,000) for requiring a new branch library. (Draft EIR, p. 4.11.e-6.)

Similar to the proposed Project, the cumulative projects would be required to comply with relevant policies and regulations and would be subject to CEQA review. The cumulative projects would also generate tax revenues for the City, a portion of which goes to fund City library facilities and services. The cumulative projects would also be required to pay the ad hoc fee of $200 per capita for the population associated with new development, to be used for staff, books, computers, and other library materials (Granger, 2018). (Draft EIR, p. 4.11.e-6.)

For the reasons discussed above, implementation of the proposed Project along with the cumulative projects considered for the purpose of this analysis would not have cumulatively significant impacts related to library facilities. **Therefore, cumulative impacts related to libraries would be less than significant**. (Draft EIR, p. 4.11.e-7.)

S. TRANSPORTATION

Construction

Other projects proposed in the City of Los Angeles would be required to implement mitigation measures (as warranted) for potential short-term construction impacts regarding potential conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Cumulative projects would be required to reduce potential construction-phase impacts regarding conflict with plans/programs. **Therefore, Project impacts would be less than cumulatively considerable.** (Draft EIR, p. 4.12-32.)

Operation

Other projects proposed in the City of Los Angeles would be required to implement mitigation measures (as warranted) for potential long-term construction impacts regarding conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Cumulative projects would be required to reduce potential operational impacts regarding conflict with plans/programs. **Therefore, Project impacts would be less than cumulatively considerable**. (Draft EIR, p. 4.12-33.)

Emergency Access

The proposed Project as well as other projects proposed in the City of Los Angeles would be required to implement mitigation measures (as warranted) for potential short-term and long-term impacts from projects. It is anticipated that cumulative projects, just as with the proposed Project, would be required to provide adequate emergency vehicle access to project sites both during the short-term construction period and long-term operational phases. **Therefore, impacts would not be cumulatively considerable**. (Draft EIR, p. 4.12-33.)

T. TRIBAL CULTURAL RESOURCES

No tribal cultural resources have been identified within the Project Site or within the vicinity of the Project Site. The Environmental Setting of the Draft EIR indicates a total of seven

related projects in the vicinity of the Project Site. The Project and related projects are located within an urbanized area of the City of Los Angeles that have been disturbed and developed over the decades. Should tribal cultural resources be uncovered during construction of these projects, each related project would be required to comply with the applicable laws and regulations regarding tribal cultural resources, and as developed for the Rose Hill Courts project described above. Additionally, related projects would be required to comply with the consultation requirements of AB 52 to determine and mitigate any potential impacts to TCRs. Thus, cumulative impacts to tribal cultural resources would be less than significant and would not be cumulatively considerable. **No cumulative tribal cultural resource impacts would occur with the implementation of the project.** (Draft EIR, p. 4.13-13.)

U. UTILITIES AND SERVICE SYSTEMS

The project would have less than significant impacts on utilities and service systems. (IS, pp. 4.18-1—4.18-9.)**Therefore no cumulative impact would occur**.

V. WILDFIRE

The project would not require the installation or maintenance of infrastructure that may exacerbate fire risk because it is an infill development project in an already urban and developed portion of the City of Los Angeles, and therefore would not require installation of infrastructure that would exacerbate fire risks. It is assumed that any current and future projects would be required to comply with City of Los Angeles Building Code and safety regulations pertaining to development in a very high fire hazard severity zone. The project site is not located in or near a WUI area and it is not located next to a designated disaster route. The project would be required to comply with City of Los Angeles Building Code and safety regulations pertaining to development in a very high fire hazard severity zone. The new buildings would include materials and fire safety features that would be more fire resistant and safer than the existing buildings. With compliance with all applicable regulations, the project would have less than significant impacts related to risk of loss, injury or death involving wildland fires. **Therefore, cumulative impacts regarding wildfire as a result of the project would be less than significant and would not be cumulatively considerable.** (Draft EIR, pp. 4.14-13—4.14-14.)

W. ENERGY

Wasteful Use of Energy

Cumulative impacts are defined by the CEQA Guidelines Section 15355 as “two or more individual effects, which when considered together, are considerable or which compound or increase other environmental impacts.” Additionally, CEQA Guidelines Section 15355(b) states that “The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.” As detailed in Section 3.0 of this document, seven related projects are located in the vicinity of the proposed Project. The geographic area for which cumulative impacts would occur for both electricity and gas would be the service areas for the electricity provider (Los Angeles Department of Water and Power) and natural gas provider (Southern California Gas Company). (Draft EIR, p. 4.15-19.)

Electricity

The commitment of resources required for the construction and operation of the project would limit the availability of such resources for future generations or for other uses during the life of the project. However, continued use of such resources is consistent with the anticipated growth within the City and the general vicinity and would not result in energy consumption requiring a significant increase in energy production for the energy provider. Additionally, as is the case with the proposed Project, current and future cumulative projects would be required to incorporate energy conservation measures into project design, such as CALGreen regulations and California Energy Standards per title 24, as well as mitigation measures, as warranted, to reduce potential energy impacts. Therefore, the energy demand associated with the project in conjunction with cumulative projects would be less than significant. (Draft EIR, p. 4.15-19.)

The proposed Project's contribution to cumulative energy impacts from electricity use would not result in a cumulatively considerable impact regarding wasteful, inefficient, and unnecessary consumption of energy during either the construction or operational phase. Impacts from the Project's electricity use would not be cumulatively considerable. Therefore, impacts in this regard would be less than significant. (Draft EIR, p. 4.15-19.)

Natural Gas

The proposed Project would increase the amount of natural gas used onsite upon project operation due to the increased number of dwelling units, compared to existing conditions. However, the use of natural gas would be on a small scale (an additional 85 units compared to existing conditions). Additionally, as discussed above, Southern California Gas Company utilizes several different sources for obtaining natural gas for its customers. (Draft EIR, pp. 4.15-19—4.15-20.)

The 2018 California Gas Report presents a comprehensive outlook for natural gas requirements and supplies for California through the year 2035 (California Gas and Electric Utilities, 2018, p. 2). Additionally, the California Gas Report states that "California natural gas demand, including volumes not served by utility systems, is expected to decrease at a rate of 0.5 percent per year from 2018 to 2035… Residential gas demand is expected to decrease at an annual average rate of 1.4 percent" (California Gas and Electric Utilities, 2018, p. 4). Regarding energy supply, "California's existing gas supply portfolio is regionally diverse and includes supplies from California sources (onshore and offshore), Southwestern U.S. supply sources (the Permian, Anadarko, and San Juan basins), the Rocky Mountains, and Canada. The Ruby Pipeline came online in 2010, bringing up to 1.5 billion cubic feet per day of additional gas to California (via Malin) from the Rocky Mountains. The Energía Costa Azul LNG (Liquefied Natural Gas) receiving terminal in Baja California provides yet another source of supply for California and also Mexico" (California Gas and Electric Utilities, 2018, p. 12). (Draft EIR, p. 4.15-20.)

The proposed Project's contribution to cumulative energy impacts from natural gas use would not result in a cumulatively considerable impact regarding wasteful, inefficient, and unnecessary consumption of energy during either the construction or operational phase. Impacts from the Project's natural gas use would not be cumulatively considerable. Therefore, impacts in this regard would be less than significant. (Draft EIR, p. 4.15-20.)

Transportation Energy

At buildout, the proposed Project's petroleum-based fuel usage is estimated to be 94,932 gallons of gasoline and 10,909 gallons of diesel fuel per year. Los Angeles County remains a

major energy producer - the second largest oil producing county in California after Kern County. There are currently 68 active oil fields in the Los Angeles Basin, and thousands of active and inactive oil and gas wells countywide. Los Angeles County is also home of the two largest refineries in California (the Chevron Refinery in El Segundo and the Tesoro Refinery in Carson), as well as others (e.g., Torrance Refinery) (Our County Energy Briefing, 2018, p. 7). Therefore, transportation related energy is being produced by various sources within the County of Los Angeles. Less than significant cumulative transportation energy impacts are anticipated due to the limited nature of the proposed Project and that its location near existing bus transit stops and, as described in the Transportation section of this document, would not result in a significant transportation impact. (Draft EIR, p. 4.15-20.)

The proposed Project's contribution to cumulative energy impacts from transportation fuel use would not result in a cumulatively considerable impact regarding wasteful, inefficient, and unnecessary consumption of energy during either the construction or operational phase. Impacts from the Project's transportation fuel use would not be cumulatively considerable. Therefore, impacts in this regard would be less than significant. (Draft EIR, p. 4.15-20.)

Conclusion

Based on the discussion above, the proposed Project's contribution to cumulative energy impacts (including electricity, natural gas, and transportation fuel use) would not result in a cumulatively considerable impact regarding wasteful, inefficient, and unnecessary consumption of energy during either the construction or operational phase. Impacts from the Project's energy use would not be cumulatively considerable. Therefore, impacts in this regard would be less than significant. (Draft EIR, pp. 4.15-20—4.15-21.)

Energy Efficiency Plans

Cumulative projects would require energy resources. Each of these projects will undergo review under CEQA, would be required to comply with applicable energy conservation standards (i.e., Title 24 standards) and mitigation measures will be implemented, if required, for each of these cumulative projects. The proposed Project would similarly be constructed in compliance with all applicable regulations regarding energy conservation (i.e., Title 24 standards). (Draft EIR, p. 4.15-21.)

Conclusion

Based on the discussion above, the proposed Project would not have a cumulative impact regarding conflict with or obstruction with a state or local plan for renewable energy or energy efficiency. Therefore, the proposed Project, in conjunction with other projects would not have a cumulatively considerable impact regarding conflict with or obstruction with a state or local plan for renewable energy or energy efficiency. Cumulative impacts regarding energy would be less than significant. (Draft EIR, pp. 4.15-21.)

SECTION VI
FINDINGS REGARDING SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES AND ENERGY USE

Significant Irreversible Environmental Changes

The State CEQA Guidelines require that EIRs reveal the significant environmental changes that would occur as a result of a proposed project. Generally, a project would result in significant irreversible environmental changes if any of the following would occur:

- The project would involve a large commitment of non-renewable resources;
- The primary and secondary impacts of the project would generally commit future generations to similar uses;
- The project involves uses in which irreversible damage could result from any potential environmental accidents; or
- The proposed consumption of resources is not justified.

In the case of the proposed project, its implementation would involve the commitment of building materials, human resources (Labor) and energy, commensurate with that of other projects of similar nature and magnitude.

Construction and operation of the Project would require an irretrievable commitment of resources that are limited, slowly renewable, or non-renewable, and consequently limit the availability of these resources, including the Project Site, for other uses or for future generations. However, the consumption of these resources for the Project would not be considered substantial and would be consistent with regional and local growth forecasts and development goals for the area. These resources would not be used in a wasteful manner and would not be depleted much quicker than existing conditions. Therefore, although the Project would result in irreversible environmental changes, those changes would be less than significant. Considering that the Project would consume an inconsequential amount of natural resources, and it is replacing an existing urban use on a redevelopment site, the limited use of nonrenewable resources is considered justified. (Draft EIR, pp. 6-6—6-10.)

SECTION VII
GROWTH-INDUCING IMPACTS

Section 15126.2(d) of the State CEQA Guidelines requires a Draft EIR to discuss the ways the project could foster economic or population growth or the construction of additional housing, directly or indirectly, in the surrounding environment. In accordance with State CEQA Guidelines Section 15126.2(d), a project would be considered to have a growth-inducing effect if it would:

- Directly or indirectly foster economic or population growth, or the construction of additional housing in the surrounding environment;
- Remove obstacles to population growth (e.g., construction of an infrastructure expansion to allow for more construction in service areas);
- Tax existing community service facilities, requiring the construction of new facilities that could cause significant environmental effects; or

- Encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.

In addition, CEQA Guidelines provide that growth inducement must not be assumed.

Population and Housing

The Project would develop 183 affordable multifamily units and two market rate manager's units. The Project would generate 286 permanent residents in the first phase of development and 380 permanent residents in the second phase of development, resulting in a total of 656 residents, which is 435 more residents, compared to current (January 2019) conditions. Each phase will have one unrestricted (not affordable) manager's unit. (Draft EIR, p. 6-10.)

Population growth in the City of Los Angeles is expected to increase by over 140,000 persons by the end of the Housing Element Update planning period in 2021, with an expected population of 3,965,433 persons by September 30, 2021. The population of the City of Los Angeles is expected to grow to 4,320,600 persons by 2035 (City of Los Angeles Department of City Planning, 2013, p. 1 4). The Project's estimated 435 residents represent approximately 0.30 percent of the City's anticipated growth by 2021. Therefore, the Project would not induce substantial growth in the City that was not anticipated in the City's General Plan. (Draft EIR, p. 6-10.)

As detailed in the 2016–2040 RTP/SCS, the forecasted population for the City of Los Angeles Subregion in 2016 is approximately 3,954,629 persons (SCAG, 2016). In 2022, the Subregion is anticipated to have a population of approximately 4,118,321 persons (SCAG, 2016). The 435 estimated new residents generated by the Project would represent approximately 0.25 percent of the population growth forecasted by SCAG in the Subregion between 2016 and 2022. The number of new residents generated by the Project would be well within SCAG's population projections in the 2016–2040 RTP/SCS for the Subregion. Therefore, the Project would not result in a significant direct growth-inducing impact. (Draft EIR, p. 6-10—6.11.)

With regard to housing, the number of households in the City of Los Angeles is anticipated to grow by approximately 364,800 compared to 2012 conditions, which equates to an increase of over 27 percent by the year 2040. The 85 new housing units created by the Project would represent approximately 0.023 percent of the household growth forecasted in the City of Los Angeles by 2040. Additionally, as of December 2018, the City of Los Angeles has not currently met their RHNA goals. Therefore, Project-related household growth would be consistent with estimated growth in the region. Accordingly, the Project would not cause housing growth to exceed projected/planned levels for the Project's buildout year. (Draft EIR, p. 6-11.)

Employment

In addition to the residential population generated by the Project, the Project would have the potential to generate indirect population growth in the vicinity of the Project Site as a result of the temporary construction employment opportunities generated by the Project as well as employment opportunities generated upon Project completion. (Draft EIR, p. 6-11.)

The Project would create temporary construction-related jobs. Due to the specialized

nature and expertise of their work, construction workers remain at a job site for the time during which their specific skills are utilized to complete a particular phase of Project construction. Construction workers are not anticipated to relocate to the Project vicinity due to their temporary work on the construction of the Project. Therefore, construction of the Project would not be considered growth inducing from a short-term employment perspective. (Draft EIR, p. 6-11.)

The proposed residential Project is anticipated to generate four employees who will perform property management and maintenance activities. The small number of employees anticipated to be employed by the Project would result in a de minimis impact on regional employment levels. Given that some of the Project's employment opportunities could be filled by people already residing in the Project area, the potential growth associated with employees of the Project who may relocate their place of residence would be less than significant. Although it is possible that some of the employment opportunities could be filled by persons moving from outside of the Project area, no new housing would need to be built to meet the employment demands of the Project. Consequently, the Project would be unlikely to create an indirect demand for additional housing or households in the area. The Project would have a less than significant impact in this regard. (Draft EIR, p. 6-11.)

Utility Infrastructure Improvements

The existing Project Site contains infrastructure such as water, sewer, gas, and electrical service to the existing 100 affordable housing units located onsite. The Project involves the development of 185 housing units, which equates to an 85 unit increase compared to existing conditions. The population on the Project Site is anticipated to increase by approximately 435 persons. It is anticipated that some utility improvements for water, sewer, gas, and electricity would need to occur in existing street rights-of-way. (Draft EIR, p. 6-11.)

The Project would not introduce unplanned infrastructure not previously evaluated in the adopted Northeast Los Angeles Community Plan, which applies to the Project Site. The Northeast Los Angeles Community Plan contains policies and goals related to increasing the amount of housing in the planning area through Objective 1-6, which states: To promote and ensure the provision of fair and equal housing opportunities for all persons regardless of income and age groups or ethnic, religious, or racial background. One of the residential opportunities identified in the plan is: Identification of areas most suitable for multiple-family development based on adequacy of infrastructure; services, especially schools; and employment, as well as neighborhood character. The Project would provide adequate infrastructure and plans would be reviewed by the City of Los Angeles Public Works Department to ensure that adequate infrastructure would be provided to the Project Site. (Draft EIR, p. 6-11—6.12.)

The area surrounding the Project Site is currently developed with various land uses including single family and multi-family residential units as well as a school and recreation center. Therefore, the Project would not remove impediments to growth. The Project is located within an urban area that is served by existing utilities and infrastructure. It is anticipated that the Project would require minor local infrastructure upgrades to water, sewer, electricity, and natural gas lines onsite. These improvements may need to occur both on the Project Site as well as in the existing street rights of way. Improvements would be limited to serving the utility demands of the Project and would not result in significant or major local or regional utility infrastructure improvements that have not otherwise been previously established on a regional level. (Draft EIR, p. 6-12.)

Conclusion

The Project would be consistent with the growth forecast for the City of Los Angeles Subregion and would be consistent with regional policies to efficiently utilize existing infrastructure and land, reduce regional congestion, and improve air quality through the reduction of vehicle miles traveled. The Project would not result in major roadway improvements and involves infill development, making use of existing land. Therefore, direct and indirect growth-inducing impacts of the Project would be less than significant. (Draft EIR, p. 6-12.)

SECTION VIII
ALTERNATIVES

A. BACKGROUND

The Draft EIR analyzed three alternatives to the Project as proposed and evaluated these alternatives for their ability to avoid or reduce the Project's significant environmental effects while also meeting the majority of the Project's objectives. The Authority finds that it has considered and rejected as infeasible the alternatives identified in the EIR and described below. This section sets forth the potential alternatives to the Project analyzed in the EIR and evaluates them in light of the project objectives, as required by CEQA.

Where significant impacts are identified, section 15126.6 of the State CEQA Guidelines requires EIRs to consider and discuss alternatives to the proposed actions. Subsection (a) states:

1. An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

Subsection 15126.6(b) states the purpose of the alternatives analysis:

2. Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

In subsection 15126.6(c), the State CEQA Guidelines describe the selection process for a range of reasonable alternatives:

3. The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the Project and could avoid or substantially lessen one or more of the significant effects. The

> EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

The range of alternatives required is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed Project. Alternatives are limited to ones that would avoid or substantially lessen any of the significant effects of the Project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the Project.

B. PROJECT OBJECTIVES

The following objectives have been established for the Project (Draft EIR, p. 2-7.):

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

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

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

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

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

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

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

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

C. ALTERNATIVES CONSIDERED BUT REJECTED FROM DETAILED ANALYSIS

Section 15126.6(c) of the State CEQA Guidelines specifies that an EIR should (1) identify alternatives that were considered by the lead agency but were eliminated from detailed consideration because they were determined to be infeasible during the scoping process; and

(2) briefly explain the reasons underlying the lead agency's determination. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives; (ii) infeasibility; and/or (iii) inability to avoid significant environmental impacts.

The following alternatives were considered but rejected as part of the environmental analysis for the Project.

- **Reduced Density/Partial Historic Preservation Alternative:** In order to eliminate significant impacts to aesthetic and historical resources, this alternative considered removing 7 of the 15 existing multi-family residential buildings on the Project Site, and limit demolition of contributing structures to a portion of the site. The eight other existing buildings would remain and two 3-story multi-family buildings would be constructed. By removing 7 of the 15 buildings, Rose Hills Court would fail to retain sufficient integrity to convey its significance. As a result, while it would somewhat lessen the impact, it would not avoid the Project's significant impact on historical resources because the property would no longer remain eligible for listing in the NRHP. Further, only a portion of the Project site would be provided with new buildings for residents and would result in 65 fewer affordable units would be added as compared to the Project, thus not meeting project objectives of increasing the supply of affordable housing. It would not meet most of the basic Project objectives, and was thus eliminated from further consideration. (Draft EIR, p. 5-5.)

- **Alternative Project Site:** The results of a search to find an alternative site within the Community Plan area on which the Project could be built determined that suitable similar locations are not available to meet the underlying purpose and objectives of the Project to locate new and additional affordable housing within walking distance to existing offsite recreational amenities and public transportation needed for low-income housing. Thus, this alternative was rejected from further consideration. (Draft EIR, p. 5-5.)

Finding: The Authority rejects, without further consideration, both the Reduced Density/Partial Historic Preservation Alternative and the Alternative Project Site Alternative, on the following grounds: (1) failure to meet most of the project objectives; and (2) inability to avoid significant environmental impacts.

D. EVALUATION OF ALTERNATIVES SELECTED FOR ANALYSIS

The alternatives selected for further detailed review within the Draft EIR focus on alternatives that could the project's significant environmental impacts, while still meeting most of the basic project objectives. Those alternatives include:

- Alternative 1: No Project/No Action Alternative (Draft EIR, 5-11 through 5-22)
- Alternative 2: Non-Historically Compliant Rehabilitation Alternative (Draft EIR, 5-22 through 5-36)
- Alternative 3: Historic Rehabilitation Alternative (Draft EIR, 5-36 through 5-50)

1. Alternative 1: No Project/No Action Alternative

Description: 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. (Draft EIR, p. 5-11.)

Impacts: The No Project/No Action Alternative would eliminate the Project's significant and unavoidable impacts to aesthetics and cultural resources (due to impacts to historical resources), and from construction noise. This Alternative would have similar impacts as the Project during operation for biological resources and transportation regarding access and circulation; bicycle, pedestrian, and vehicular safety; and parking. Impacts from this alternative would be more than the Project during operation with regards to hazards and hazardous materials, wildfire, and energy. Impacts associated with the remaining environmental issues would be less than those of the Project. (Draft EIR, p. 5-22.)

Attainment of Project Objectives: Under the No Project/No Action Alternative, no new development would occur. Thus, this alternative would not meet any of the Project's objectives of providing additional safe affordable housing units close to public transit and parks while maximizing accessibility and energy efficiency. (Draft EIR, p. 5-22.)

Finding: The Authority rejects the No Project/No Action Alternative on the following grounds, which individually provides sufficient justification for rejection of this alternative: the alternative would not meet any of the project objectives.

2. Alternative 2: Non-Historically Compliant Rehabilitation Alternative

Description: This alternative would redevelop the existing units at Rose Hill Courts to modernize and upgrade the units and the site and make aesthetic and energy efficiency improvements. This alternative would consist of maintaining the existing 100 units, and providing renovations to restore and modernize the buildings, including (1) comprehensive rehabilitation of the interior and exterior of the units; (2) lead and asbestos remediation; (3) structural and seismic repairs; and (4) replacement of major building systems. (Draft EIR, pp. 5-22—5-23.)

Impacts: The Non-Historically Complaint Rehabilitation Alternative would not avoid the Project's significant and unavoidable impacts to aesthetics and cultural resources (with respect to historical resources). However, it would reduce the Project's short-term significant and unavoidable impacts of onsite and offsite construction noise to a less-than-significant level after mitigation. This alternative would also have a lesser environmental impact than the Project with regards to air quality, geology and soils and paleontological resources, greenhouse gas emissions, land use and planning, population and housing, public services, transportation, tribal cultural resources, wildfire, and energy. Impacts associated with the remaining environmental issues would be similar to those of the Project. (Draft EIR, p. 5-35.)

Attainment of Project Objectives: This alternative would meet the Project objective of providing a site that enhances security and provides for safe and useable open/green space. This alternative would partially meet the following objectives: (i) to design the project in a manner that maximizes accessibility, energy efficiency and contemporary amenities, and (ii) to provide a long-term useful life of buildings to minimize the future

need for investment in affordable housing rehabilitation and repairs. The alternative would not meet any other objective. (Draft EIR, p. 5-36.)

Finding: The Authority rejects the Non-Historically Compliant Rehabilitation Alternative on the following grounds, each of which individually provides sufficient justification for rejection of this alternative: (1) the alternative fails to avoid the Project's significant and unavoidable impacts to aesthetics and cultural resources (with respect to historical resources); (2) the alternative would only marginally fulfill the project objectives.

3. Alternative 3: Historic Rehabilitation Alternative

Description: This alternative would redevelop the existing units at Rose Hill Courts in a way that would preserve the historic integrity of the property. This alternative would rehabilitate the planning and design principles of the Garden City and Modern movements utilized in the Rose Hill Courts development, including but not limited to, low-slung buildings, large open spaces, and recreation amenities. The Historic Rehabilitation Alternative would retain the existing 100 units on the Project Site and update the existing units with (1) lead and asbestos remediation; (2) structural and seismic repairs; and (3) replacement of major building systems. (Draft EIR, p. 5-36.)

Impacts: The Historic Rehabilitation Alternative would avoid the Project's significant and unavoidable impacts to aesthetics (with respect to historical resources) and historical resources since the rehabilitation of the buildings would be done so as to preserve the historical characteristics of the buildings. This alternative would also reduce the Project's short-term significant and unavoidable impacts of noise to a less than significant level during construction. Furthermore, this alternative would have a lesser environmental impact than the Project with regards to air quality, geology and soils and paleontological resources, greenhouse gas emissions, land use and planning, public services, transportation, tribal cultural resources, wildfire, and energy. Impacts associated with the remaining environmental issues would be similar to those of the Project. (Draft EIR, p. 5-49.)

Attainment of Project Objectives: Under this alternative, none of the objectives would be fully met. The only objectives that will be partially met are: (i) to design the project in a manner that maximizes accessibility, energy efficiency and contemporary amenities; (ii) to provide a site that enhances security and provides for safe and useable open/green space; and (iii) to provide a long-term useful life of buildings to minimize the future need for investment in affordable housing rehabilitation and repairs. The alternative would not meet any other project objective. (Draft EIR, p. 5-49.)

Finding: The Authority rejects the Historic Rehabilitation Alternative on the following grounds, which individually provides sufficient justification for rejection of this alternative: the alternative would only marginally fulfill the project objectives.

E. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 15126.6(e)(2) of the State CEQA Guidelines indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR.

Of the alternatives analyzed, Alternative 1, the No Project/No Action Alternative is the

environmentally superior alternative. However, State CEQA Guidelines Section 15126.6(e)(2) indicates that where the no project alternative is environmentally superior, the Draft EIR "shall also identify an environmentally superior alternative among the other alternatives." Alternative 3, the Historic Rehabilitation Alternative, would be the environmentally superior alternative due to the elimination of significant and unavoidable impacts to aesthetics and cultural resources (with respect to historical resources) since the rehabilitation of the buildings would be done so as to preserve the historical characteristics of the buildings. Alternative 3 would also reduce the Project's short-term significant and unavoidable impacts of noise to a less-than-significant level during construction. Alternative 3 would also reduce many of the Project's less-than-significant impacts compared to the other alternatives. Thus, of the range of alternatives analyzed, Alternative 3 would be the Environmentally Superior Alternative. (Draft EIR, pp. 5-50—5-51.)

However, none of the Project objectives would be fully met, only three of the eight objectives would be partially met, and five of the eight Project's objectives would not be met at all. Alternative 3 would not be able to provide the region wide economic, legal, social, technological, or other benefits to the low-income population that the objectives of the Project would provide. Therefore, even though Alternative 3 is the Environmentally Superior Alternative, it would not provide the greatest benefits to the low-income population that HACLA is mandated to serve. (Draft EIR, p. 5-51.)

CEQA does not require the Authority to choose the environmentally superior alternative. Instead CEQA requires the Authority to consider environmentally superior alternatives, explain the considerations that led it to conclude that those alternatives were infeasible from a policy standpoint, weigh those considerations against the environmental impacts of the proposed Project, and make findings that the benefits of those considerations outweighed the harm. However, because the Project would not result in any significant and unavoidable impacts, the City is under no obligation to consider or adopt any alternative to the Project, even if that alternative would reduce the already less than significant impacts further and/or would achieve all of the Project objectives, and the information contained herein is for informational purposes only. (Pub. Res. Code § 21002.)

SECTION IX
ADOPTION OF STATEMENT OF OVERRIDING CONSIDERATIONS

Pursuant to State CEQA Guidelines Section 15093(a), the Board of Commissioners must balance, as applicable, the economic, legal, social, technological, or other benefits of the Project against its unavoidable environmental risks in determining whether to approve the project. If the specific benefits of the project outweigh the unavoidable adverse environmental effects, those environmental effects may be considered acceptable.

Having reduced the adverse significant environmental effects of the Project to the extent feasible by adopting mitigation measures and having considered the entire administrative record on the Project, the Board of Commissioners has weighed the benefits of the Project against its unavoidable adverse impacts after mitigation in regards to aesthetics, cultural (historic archaeological) resources, and noise. While recognizing that the unavoidable adverse impacts are significant under CEQA thresholds, the Board of Commissioners nonetheless finds that the unavoidable adverse impacts that will result from the Project are acceptable and outweighed by specific social, economic and other benefits of the Project.

In making this determination, the factors and public benefits specified below were considered. Any one of these reasons is sufficient to justify approval of the Project. Thus, even if

a court were to conclude that not every reason is supported by substantial evidence, the Board of Commissioners would be able to stand by its determination that each individual reason is sufficient. The substantial evidence supporting the various benefits can be found in the preceding findings, which are incorporated by reference into this section, and in the documents found in the Records of Proceeding.

The Board of Commissioners therefore finds that for each of the significant impacts which are subject to a finding under CEQA Section 21081(a)(3), that each of the following social, economic, and environmental benefits of the Project, independent of the other benefits, outweigh the potential significant unavoidable adverse impacts and render acceptable each and every one of these unavoidable adverse environmental impacts:

1. Implement **Vision Plan People Goal #1** "Revitalize communities & enhance livability" by Improving the quality of life for current and future residents of Rose Hill Courts through the provision of high quality amenities including a 6,366-square-foot Management Office/Community Building and ample open space and recreational amenities to promote continued community outdoor use such as outdoor communal space with shaded seating and grills, children's play areas with tot lots, paved surfaces, and several courtyards.

2. Implement **Vision Plan Place Goal #3** "Preserve existing deeply affordable housing" by creating a one for one replacement of the current housing that will continue to remain deeply affordable, and through new construction extending the useful life of the property.

3. Implement **Vision Plan Place Goal #4**, "Increase the number of affordable housing units in Los Angeles, by contributing to the availability of new permanent affordable units at various levels of affordability and with various housing types," by increasing the number of units on site from 100 to 185, and by providing safe, secure, high quality and deeply affordable housing for a diverse mix of residents of the City of Los Angeles.

4. Implement **Vision Plan Place Goal #5**, "Improve outdated housing stock and affordable housing models" by incorporating current 21st century thinking on community development in the provision of improved site layout, functionality, and appropriate unit mix to accommodate current and future populations and maximizing federal and state funding opportunities, as well as alternative funding sources through partnership with private developers, to further the Authority's commitment to provide high quality affordable housing.

5. Implement the Authority's **Build HOPE Vision Plan ("Vision Plan") Place Strategy #1, "**Stabilize the physical and financial viability of the conventional public housing portfolio" by redeveloping the aging Rose Hill Courts public housing site through fully code compliant new construction with complete mitigation of lead, asbestos and termite issues; and conversion to a more financially stable Section 8 platform.

6. Implement **Vision Plan Place Strategy #7** "Improve sustainability and reduce carbon footprint," by utilizing sustainable planning and building strategies, including increased density, to minimize the impact of housing on the environment while promoting healthy living for residents.

7. Implement **Vision Plan People Strategy #6**, “Enhance resident access to education opportunities, workforce readiness training, and skills development,” by increasing economic opportunity for public housing residents and low income residents of the City of Los Angeles through the payment of federal prevailing wages and through implementation of HACLA’s Section 3 Guide and Compliance Plan at Rose Hill Courts.

8. Implement **Vision Plan People Strategy #12**,”Increase opportunities for use of common open space,” by providing a range of outdoor recreational areas for residents, with new seating, fitness, and play areas for a range of ages.

9. Implement **Vision Plan People Strategy #15**, “Improve the security monitoring at all HACLA sites,” through careful site planning and design features and investing in capital improvements for security (cameras, lighting, on site staff) at Rose Hill Courts.

10. Ensure that redevelopment activities minimize temporary and permanent displacement of residents.