

RECORD OF DECISION AND FINDINGS STATEMENT

FOR THE

ROSE HILL COURTS REDEVELOPMENT PROJECT



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1.0 DESCRIPTION OF THE PROJECT

1.1 Overview

This document is a Record of Decision (ROD) and Findings Statement for the Rose Hill Courts Redevelopment Project (Project). The Project Site is located at 4446 Florizel Street and is within the Northeast Community Plan area, in the El Sereno Community of the City of Los Angeles. The Project Site is generally bounded by Florizel Street to the north, McKenzie Avenue to the east, Mercury Avenue to the south, and Boundary Avenue to the west. This document has been prepared by the Los Angeles Housing and Community Investment Department (HCID), which is the NEPA Lead Agency and the Responsible Entity for the proposed project. The Responsible Agency for this project is the United States Department of Housing and Urban Development (HUD). HCID has been designated as the Responsible Entity by HUD for assumption of its authority and lead agency responsibility under the National Environmental Policy Act (NEPA). This ROD and Findings Statement have been prepared pursuant to NEPA (42 USC §4321 et seq.), the Council on Environmental Quality Regulations for implementing NEPA (40 CFR Parts 1500-1508) and HUD regulations for Environmental Review Procedures for Entities Assuming HUD Environmental Responsibilities (24 CFR Part 58).

This ROD and Findings Statement draws upon facts and conclusions in the Final Environmental Impact Statement (FEIS) approved by HCID, as the Responsible Entity. This ROD and Findings Statement attests to the fact that HCID has complied with all applicable procedural requirements in reviewing this matter, including, but not limited to:

- Preparation and approval of the Draft Scope for the Environmental Impact Statement for public review and comment;
- Holding of public meetings on the Draft Scope;
- Receiving public comments on the Draft Scope;
- Preparation and approval of the Final Scope for the Environmental Impact Statement;
- Preparation and approval of the Draft Environmental Impact Statement (DEIS) for public comment and review;
- Filing and distribution of the DEIS and notices of completion and availability;
- Receiving public comments on the DEIS within the prescribed period;
- Preparation and approval of the FEIS for review;
- Filing and distribution of the FEIS and notices of completion and availability; and
- Preparation of this Record of Decision and Findings Statement.

This ROD and Findings Statement also attests to the fact that HCID has given due consideration to the Draft Scope, Final Scope, DEIS and FEIS and the public comments submitted on the Proposed Action. This ROD and Findings Statement is the final step in the NEPA process.

1.2 Project Purpose and Need

The Project consists of the redevelopment of the Rose Hill Courts apartment complex. Rose Hill Courts is one of the oldest public housing complexes within the City of Los Angeles (City), and it was originally developed by the Housing Authority of the City of Los Angeles (HACLA) in 1942.

The existing apartment complex at the Project Site is comprised of 15 structures, of which 14 structures include 100 multi-family units, and one structure includes an administration building. The buildings throughout the complex are rectangular in design and are generally arranged in parallel groupings. These groupings include:

- Northern Block - the administration building facing Florizel Street;
- Western Block - three rectangular apartment buildings;
- Eastern Block - one rectangular, and four square apartment buildings; and
- Southern Block - six rectangular apartment buildings.

As developer of the Project, The Related Companies of California, LLC (Related) would be responsible for the redevelopment that is proposed to occur. During Project construction, the complex residents would be required to be temporarily relocated. Specific tenant relocation assistance will be provided by Related during Project construction. Residents will be provided relocation counseling, compensation for moving expenses, and provided with decent, safe and sanitary housing choices.

The underlying purpose of the Proposed Action is to provide more affordable housing to meet the City's affordable housing needs and to allow the current residents the right to return after the redevelopment. The Rose Hill Courts Redevelopment would continue to ensure that low- and moderate-income housing units are equitably distributed throughout the Community Plan area on a fair-share basis in relationship to all other planning areas within the City. The Project would provide a total of 185 apartment units onsite, thereby contributing to the maintenance and expansion of low-income housing stock within the Los Angeles region. 183 of the 185 units would be affordable, with two units of the 185 being market-rate manager's units.

1.3 Description of the Proposed Action Alternative

The Rose Hill Courts Redevelopment would demolish all the existing buildings and construct a total of 185 housing units (183 of which are affordable and two of which are manager's units) along with a community building onsite, in two phases.

The proposed two-phase Project includes: the demolition of Rose Hill Courts' existing 15 structures and subsequent construction of 185 housing units onsite (183 of which would be affordable and two units of which would be unrestricted manager's units). The Proposed Action proposes nine buildings that would include a total of 88 one-bedroom units, 59 two-bedroom units, 30 three-bedroom units, and eight four-bedroom units. The Proposed Action would also include a 6,366-square-foot Management Office/Community Building and a "Central park" green space, creating a park-like setting for residents. The Proposed Action would provide a total of 174 parking spaces onsite, with at-grade and tuck-under parking; upgraded lighting, fencing, signage, and security features; and storm drain and utility improvements. The new sustainably-designed buildings would be energy efficient and the landscaping would include water-efficient irrigation. Rose Hill Courts was constructed in 1942 by HACLA as a low-income public housing project. The Rose Hill Courts complex

is located at 4446 Florizel Street, on a 5.24-acre site. The site is located within the Community Plan, in the El Sereno neighborhood area of the City of Los Angeles.

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

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

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

1.3.1 Project Design

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

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

The proposed buildings would be designed in a contemporary style. Projecting balcony decks, horizontal overhangs and canopies would be integrated with other architectural elements, such as balcony railings and shading devices. These architectural elements would provide horizontal and

vertical articulations that would serve to break up the building planes and modulate building massing. The buildings are designed with a variety of exterior finishes, including stucco, composite siding, storefront windows, simulated wood accents, metal railings, integrated signage and lighting.

Access, Circulation Parking

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

Landscaping and Open Space

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

Lighting and Signage

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

Fencing and Signage

Fencing would be located between buildings. The central green area would be fenced from the street, and pedestrian walks accessing perimeter streets would have combination of hedges and fencing to clearly define paths of access. The site will have security features including cameras and controlled access to mid-rise buildings. Ground rules will be established by the property management company (Related Management Company) and onsite maintenance staff will keep the property clean. Secured building entry points and pedestrian security gates are located throughout the Project Site.

Sustainability Features

The proposed Project has been designed based on principles of smart growth and environmental sustainability by increasing the residential density onsite, creating an emphasis on walkability and access to public open space, with proximity to nearby retail, educational and transit amenities. In

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

1.3.2 Project Construction and Scheduling

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

Relocation Plan

As described in more detail in the Relocation Plan adopted by HACLA on November 26, 2019, the Project will involve relocating the current households while the demolition and new construction occurs. A two-phase approach to the redevelopment is being utilized to minimize the amount of time offsite for the residents. Phase I involves the demolition of 20 units, 15 of which are currently occupied (as of January 2019). Once the existing buildings on the Phase II portion of the site are vacated, demolition and construction of Phase II can begin.

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

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

1.4 Project History and Public Participation

HACLA conducted significant outreach before transitioning the redevelopment strategy from substantial rehabilitation to demolition and new construction. HACLA and Related have continually engaged key participants in designing the Project at a scale that is contextual and appropriate for the site and the community. Over 30 meetings were held with current residents, the surrounding community, resident advocates, political stakeholders and others through design charrettes, resident surveys, and interactive meetings on various aspects of the Project including the development program, design features, relocation, environmental review, offsite provisions of sustainable infrastructure and transportation related amenities etc.

1.4.1 NEPA Process

The National Environmental Policy Act (NEPA) requires the preparation of an Environmental Impact Statement (EIS) for major federal actions that may significantly affect the quality of the human environment. The Draft EIS has been prepared by HACLA to describe the potential environmental effects of the Proposed Action, which is the approval of funding and development agreements by HUD for the redevelopment of the 5.24-acre Project Site in the City of Los Angeles, California.

Specifically, the Proposed Action is subject to compliance with NEPA because HACLA is proposing a HUD Section 18 demolition/disposition and 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”).

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 further described under Cultural Resources below.

A Notice of Intent (NOI) was published in the Federal Register on September 20, 2018, to inform agencies and the general public that a DEIS would be prepared for the Proposed Action. HCID also solicited comments concerning the DEIS. A public scoping meeting to gather input from residents and stakeholders regarding the scope and content of the DEIR/DEIS was held from 5:00 p.m. - 7:00 p.m. on Thursday October 4, 2018, at the Rose Hill Courts Community Building at 4446 Florizel Street in Los Angeles, CA 90032. A notice of the scoping meeting was included in the NOP for the proposed project, which was mailed on September 19, 2018, to all current residents of Rose Hill Courts, as well as all property owners and tenants within 500 feet of the site. In addition, the notice was sent to news publications (La Opinión newspaper and the Daily News) as well as interested parties and organizations. Scoping meeting notes summarizing the scoping meeting were prepared and included within Appendix C7 of the DEIR.

The scoping comments were considered in the DEIS, which was completed in September 2019. The Notice of Availability (NOA) of the DEIS for the Rose Hill Courts Redevelopment Project was distributed to federal, state, and local agencies and other interested parties, including Rose Hill Courts residents and neighbors within 500 feet of the site. The Draft EIS portion of the Draft EIR/EIS was made available for public review on September 11, 2019 and was noticed in the Federal Register. The EPA published the DEIS availability in the Federal Register on September 19, 2019. Overall, the review and comment period included approximately 46 days for the DEIS from September 20, 2019 through November 4, 2019. The DEIS was made available to the public throughout the comment period at HACLA’s Office and on the HACLA website at: <http://www.hacla.org/dsprojects/ID/8/Rose-Hill-Courts>. One comment was received from the U.S. Environmental Protection Agency, which stated that the comments it has provided in its scoping letter were addressed in the DEIS.

This FEIS was completed in November 2019 and included responses to substantive comments and a discussion of any revisions made to the EIS in the FEIR. The NOA of the FEIS was distributed to federal, state, and local agencies and other interested parties, including Rose Hill Courts residents and neighbors within 500 feet of the site. The EPA published the FEIS availability in the Federal Register on January 3, 2020, noting the comment period ending on January 23, 2020, which satisfies a shortened 20-day review period, as authorized by EPA per 40 CFR 1506.10(d). The NOA was published in the Los Angeles Daily News on December 20, 2019. The FEIS was made available to the public throughout the comment period and following the comment period at HCID’s Office and on the HCID Notices website page. One comment on the FEIS was received in response to the Notice of

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Availability for the FEIS from Gabrieleno Band of Mission Indians - Kizh Nation requesting consultation. On January 21, 2020, HACLA responded to clarify that it has already concluded consultation with the Gabrieleno Band of Mission Indians - Kizh Nation under CEQA for the Proposed Action. On June 21, 2019, HACLA proposed an amended condition of project approval providing for a Native American Monitor during both the training for construction workers and ground disturbing activities, which the tribe found acceptable.

This ROD and Findings Statement has been issued following a shortened 20-day review period granted by EPA per 40 CFR 1506.10(d), beginning with the publication of the FEIS availability in the Federal Register on January 3, 2020.

2.0 ENVIRONMENTAL IMPACTS AND MITIGATION

The environmental analysis considered the following impact categories: Historic Preservation; Floodplain Management; Wetlands Protection; Coastal Zone Management; Sole Source Aquifers; Endangered Species; Wild and Scenic Rivers; Air Quality; Farmlands Protection; Environmental Justice; Noise Abatement and Control; Toxic/Hazardous/Radioactive Materials, Contamination, Chemicals or Gases; Siting of HUD-Assisted Projects near Hazardous Operations; Airport Clear Zones and Accident Potential Zones Hazards; Land Use; Hazards and Nuisances including Site Safety; Energy Consumption; Socioeconomics; Community Facilities and Services; Natural Features; and Other Factors.

Based on the analysis in the FEIS, the following impact categories would not have significant, adverse impacts and thus did not warrant mitigation: Floodplain Management; Wetlands Protection; Coastal Zone Management; Sole Source Aquifers; Endangered Species; Wild and Scenic Rivers; Air Quality; Farmlands Protection; Environmental Justice; Siting of HUD-Assisted Projects near Hazardous Operations; Airport Clear Zones and Accident Potential Zones Hazards; Hazards and Nuisances including Site Safety; Energy Consumption; Socioeconomics; and Other Factors. Supporting analysis is provided in the FEIS and thus these issues are not discussed further.

Below is a list of the environmental impacts for which mitigation is warranted and a summary of the mitigation proposed that would reduce those impacts to a less than significant level (refer to the Mitigation Monitoring and Reporting Program (MMRP) in **Appendix A** to this document¹):

Biological Resources: Mitigation measures **BR-1** and **BR-2** would reduce the potential indirect impacts on nesting birds and their young from increased noise, vibration, and dust during construction. The Proposed Action has the potential to impact migratory non-game breeding birds, and their nests, young and eggs. Mitigation measures **BR-1** and **BR-2** would reduce potential impacts on biological resources to a less than significant level.

Hazards and Hazardous Materials: With implementation of mitigation measures **HAZ-1** and **HAZ-2**, the Proposed Action would comply with existing local, state, and federal regulations governing removal of lead in the soil and radon exposure, and impacts would be less than significant with mitigation incorporation.

Geology and Soils: With adherence to applicable regulatory requirements and mitigation measure **GEO-1**, project-level impacts related to geology and soils would be less than significant. With the implementation of recommended mitigation measure **PALEO-1**, project-level impacts to paleontological resources would be reduced to less than significant.

Public Services: With implementation of mitigation measures **PS-1** and **PS-2**, there would be less than significant impacts on law enforcement services during both the construction and operational phases of the Proposed Action. With implementation of mitigation measure **PS-3** there would be less than significant impacts regarding access to the Rose Hill Recreation Center, Rose Hill Park, and Ernest E. Debs Regional Park during the construction phase of the Proposed Action.

Transportation: Implementation of mitigation measure **TRANS-1** would result in less than significant construction-traffic related impacts to the intersection of Monterey Road and Huntington

¹ Please note that the MMRP for Attachment A to this ROD document includes all mitigation measures for both the FEIR and the FEIS, so that all mitigation measures are included from both the CEQA and NEPA document.

Drive. With implementation of mitigation measures **TRANS-2** and **TRANS-3**, during the Project construction phase, the Proposed Action would have less than significant temporary construction-related impacts on traffic and transportation.

The Proposed Action would contribute considerably to a significant and adverse impact regarding: Aesthetics; Cultural (Historical and Architectural) Resources; Public Health and Safety; and Noise. Below is a summary of significant and unavoidable impacts of the Proposed Action:

2.1 Aesthetics

As discussed in **Section 4.1**, Aesthetics, of the DEIR, 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. For the purposes of NEPA, NRHP-eligible properties are also considered historic resources. The history of Rose Hill Courts is discussed in further detail in **Section 3.0**, Environmental Setting, and **Section 4.4**, Cultural Resources, of the DEIR. Since the existing Rose Hill Courts complex is listed in the CRHR because the buildings are historic, the historic building complex is therefore considered to be a scenic resource.

The proposed demolition of the existing buildings would substantially damage a scenic resource, which would be considered a significant impact. As discussed in **Section 4.4**, Cultural Resources, of the DEIR, in most circumstances, the demolition of a historical resource cannot be mitigated to a less than significant level. Therefore, the Proposed Action would have a significant adverse impact to the historical buildings on the Project Site and thus would have a significant and unavoidable adverse impact to a scenic resource.

The Proposed Action would be subject to mitigation measures **CUL-1** and **CUL-2** to comply with CEQA and NEPA regarding historic cultural resources. However, the mitigation measures would not reduce potentially significant impacts on built environment resources to a less than significant level. Therefore, impacts on the historic buildings and on aesthetics would remain significant and unavoidable after mitigation.

With regard to cumulative impacts, although there are no known related projects involving historical resources within a similar context or property type as Rose Hill Courts, it is reasonably foreseeable that HACLA could redevelop, partially redevelop, or significantly rehabilitate other public housing complexes in the future. If the other foreseeable public housing projects are historical resources, the Proposed Action could potentially contribute to cumulative impacts on historical resources (GPA Consulting, 2018, p. 1). Therefore, cumulative impacts to aesthetics (due to the loss of the historical resources) would be significant and would be cumulatively considerable.

MM CUL-1: The Project Applicant shall prepare an interpretive display and install it in the new community building on the redeveloped Rose Hill Courts property. The interpretive display shall be completed to coincide with the opening of the community building once construction is complete. It shall include a brief history of the historic property, its significance in the contexts of public and defense worker housing in Los Angeles during the Second World War and public housing design related to the Garden City and Modern movements, and a description of the Undertaking which led to the demolition of the historic property. The display shall be professionally written,

illustrated, and designed. The content shall be prepared by persons meeting the Secretary of the Interior's (SOI) Professional Qualifications Standards for 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 PA Stipulation I.A.)

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

2.2 Cultural (Historical Architectural) Resources

The Proposed Action would involve the demolition of the existing Rose Hill Courts public housing complex. Rose Hill Courts is a historical resource because it was formally determined eligible for listing in the NRHP and therefore, was automatically listed in the CRHR. The significance of Rose Hill Courts would be materially impaired by the Proposed Action because it would no longer be listed in the CRHR or eligible for listing in the NRHP if it were demolished. Therefore, impacts associated with historical resources would be significant.

Since the Proposed Action involves funding from HUD, it qualifies as an “undertaking” subject to a Programmatic Agreement (PA) between the City of Los Angeles, the California State Historic Preservation Officer (SHPO), and the Advisory Council on Historic Preservation (AHP) regarding Historic Properties affected by use of HUD funding. HCID initiated the Section 106 consultation process and prepared a Project PA with the two Project sponsors, HACLA and the Related Companies of California (Related), as Concurring Parties, to implement stipulations to take into account the effect of the Proposed Action on potential historic properties, and outlining actions to be taken if historical or cultural deposits are discovered during Project construction.

As discussed in Section 4.4, Cultural Resources of the DEIR, in most circumstances, the demolition of a historical resource cannot be mitigated to a less than significant level. Nonetheless, mitigation measures **CUL-1** and **CUL-2** would be implemented to comply with CEQA and NEPA regarding historic cultural resources. The Applicant will have a qualified professional architectural historian prepare an interpretive display to be installed in the new community building on the redeveloped Rose Hill Courts Project Site. The display will include a brief history of the historic property, its significance in the contexts of public and defense worker housing in Los Angeles during the Second World War and public housing design related to the Garden City and Modern movements, and a

description of the Project which led to the demolition of the historic property. The display will be reviewed and approved by SHPO before it is produced and installed. HACLA will also add to its existing website a section dedicated to the history of HACLA and public housing in Los Angeles within six (6) months of completing the Rose Hill Courts Redevelopment Project. The website will provide content on the history of the agency, the significance of public housing in the City, and notable examples of public housing architecture and site planning.

However, these mitigation measures would not reduce potentially significant impacts on built environment resources to a less than significant level. Therefore, even after implementation of mitigation measures **CUL-1** and **CUL-2**, impacts on historical resources would remain significant and unavoidable. GPA Consulting (2018:1) concluded that the Proposed Action when considered with other potential projects would have a significant cumulative impact on historical resources. Although, there are no known related projects involving historical resources within a similar context or property type as Rose Hill Courts, it is reasonably foreseeable that HACLA could redevelop, partially redevelop, or significantly rehabilitate other public housing complexes in the future. If the other foreseeable public housing projects are historical resources, the Proposed Action could potentially contribute to cumulative impacts on historical resources (GPA Consulting, 2018, p. 1). Therefore, cumulative impacts associated with historical resources would be cumulatively considerable.

Refer to mitigation measures **CUL-1** and **CUL-2**, listed above.

2.3 Public Health & Safety

As detailed in this EIS, Project impacts related to public services, and hazards/hazardous materials would be less than significant after implementation of mitigation. However, regarding noise, mitigation measures **N-1** through **N-5** would result in an appreciable decrease in exposures, but these short-term exposures would still be significant sometimes during construction. Therefore, Proposed Action impacts related to increased noise levels during construction would be significant and unavoidable after implementation of mitigation measures **N-1** through **N-5**.

MM N-1: The construction contractor will conduct noise monitoring near sensitive receivers identified for this Project, during the suspected noise producing construction activities. During times that active construction equipment is within 200 feet of a residence or other sensitive receiver, noise measurements will be taken for at least three 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.)

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

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

- For all noise-producing equipment, use types and models that have the lowest horsepower and the lowest noise generating potential practical for their intended use.
- The construction contractor will ensure that all construction equipment, fixed or mobile, is properly operating (tuned up) and lubricated, and that mufflers are working adequately.
- Have only necessary equipment on site.
- Use manually adjustable or ambient-sensitive backup alarms.

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

- Install portable noise barriers, including solid structures and noise blankets, between the active noise sources and the nearest noise receivers.
- Temporarily enclose localized and stationary noise sources.
- Store and maintain equipment, building materials and waste materials as far as practical from as many sensitive receivers as practical.

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

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

2.4 Noise

The use of heavy equipment during construction would result in short term increases in exposures of nearby sensitive receivers. The increase over ambient levels would exceed the significance threshold at all receptors for both phases of Project construction. Implementation of mitigation measures **N-1** through **N-5** would result in an appreciable decrease in exposures, but these short-term exposures would still be significant sometimes during construction. Therefore, temporary Project impacts related to increased noise levels during construction would be significant and unavoidable after mitigation.

The construction contractor will conduct noise monitoring near sensitive receivers identified for this Proposed Action, during the suspected noise producing construction activities. If the monitored noise levels exceed background (ambient) noise levels by 5 dBA or more, then the construction contractor will mitigate noise levels using temporary noise shields, noise barriers or other mitigation measures to comply with those restrictions or standards. These may include the use of portable noise barriers, including solid structures and noise blankets, between the active noise sources and the nearest noise receivers. Installation of the temporary sound barriers provided in the mitigation measures would

reduce the noise generated by onsite construction activities but they may not reduce the impacts to less than significant levels at all times. There are no other feasible mitigation measures that could be implemented to reduce the temporary noise impacts from onsite construction to sensitive receptors. As such, construction noise impacts associated with onsite noise sources would remain significant and unavoidable.

Cumulative construction impacts could occur if other construction projects were active concurrently with development of the Proposed Action, 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.

2.5 Cumulative Impacts

To determine the cumulative effects of the Project, this section includes a review of past, present, and reasonably foreseeable future projects in the vicinity of the Project area and provides an analysis of their short- and long-term incremental effects on the local environment. The combined, incremental effects of human activity, referred to as cumulative impacts, accumulate over time, from one or more sources, and can result in the degradation of important resources. Because federal projects cause or are affected by cumulative impacts, this type of impact must be assessed in documents prepared under NEPA.

Aesthetics

With regard to cumulative impacts as discussed in Section 4.1.4 of the DEIR, although there are no known related projects involving historical resources within a similar context or property type as Rose Hill Courts, it is reasonably foreseeable that HACLA could redevelop, partially redevelop, or significantly rehabilitate other public housing complexes in the future. If the other foreseeable public housing projects are historical resources, the Project could potentially contribute to cumulative impacts on historical resources (GPA Consulting, 2018, p. 1). Therefore, cumulative impacts to aesthetics (due to the loss of the historical resources) would be significant and would be cumulatively considerable.

Air Quality

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 Action is compliant with the AQMP, so the incremental contribution of the Project would not be cumulatively considerable.

Based on SCAQMD guidance, individual construction projects that exceed the recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment. As shown above, construction-related daily emissions at the Project Site would not exceed any of SCAQMD's regional or localized significance thresholds including NO_x, CO, PM₁₀ and PM_{2.5}. Therefore, the Project's contribution to cumulative air quality impacts due to localized emissions would not be cumulatively considerable and, therefore, would be less than significant.

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

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

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.

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 and mitigation measures **CUL-1** and **CUL-2**, the Project would have a significant and unavoidable impact on historical resources.

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

The potential for cumulative impacts from the Project were also considered.

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

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

Archaeological Resources

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

Human Remains

No known traditional burial sites or other type of cemetery usage has been identified within the Project Site or in the vicinity. In addition, as previously indicated, the Project Site is developed with 15 buildings. The planned development would require some excavation that would extend into native soils. Thus, the potential exists to encounter human remains during excavation activities. Any of the related projects requiring excavation would also raise the potential to encounter human remains. A number of regulatory provisions address the handling of human remains inadvertently uncovered during excavation activities. These include State Health and Safety Code § 7050.5, PRC § 5097.98, and State CEQA Guidelines § 15064.5(e). Implementation of these provisions in the event of the inadvertent discovery of human remains would reduce potential impacts on a less than significant level. Since the Project is required to comply with these provisions, its cumulative impacts on human remains would be less than significant.

Energy

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 Action, current and future cumulative projects would be required to incorporate energy conservation measures into project design, such as CALGreen regulations and California Energy Standards per Title 24, as well as mitigation measures, as warranted, to reduce potential energy impacts. Therefore, the energy demand associated with the Project in conjunction with cumulative projects would be less than significant.

The Proposed Action's contribution to cumulative energy impacts from electricity use would not result in a cumulatively considerable impact regarding wasteful, inefficient, and unnecessary

consumption of energy during either the construction or operational phase. Impacts from the Project's electricity use would not be cumulatively considerable. Therefore, impacts in this regard would be less than significant.

Natural Gas

The Proposed Action would increase the amount of natural gas used onsite upon Project operation due to the increased number of dwelling units, compared to existing conditions. However, the use of natural gas would be on a small scale (an additional 85 units compared to existing conditions). Additionally, as discussed above, Southern California Gas Company utilizes several different sources for obtaining natural gas for its customers.

The 2018 California Gas Report presents a comprehensive outlook for natural gas requirements and supplies for California through the year 2035 (California Gas and Electric Utilities, 2018, p. 2). Additionally, the California Gas Report states that "California natural gas demand, including volumes not served by utility systems, is expected to decrease at a rate of 0.5 percent per year from 2018 to 2035... Residential gas demand is expected to decrease at an annual average rate of 1.4 percent" (California Gas and Electric Utilities, 2018, p. 4). Regarding energy supply, "California's existing gas supply portfolio is regionally diverse and includes supplies from California sources (onshore and offshore), Southwestern U.S. supply sources (the Permian, Anadarko, and San Juan basins), the Rocky Mountains, and Canada. The Ruby Pipeline came online in 2010, bringing up to 1.5 billion cubic feet per day of additional gas to California (via Malin) from the Rocky Mountains. The Energía Costa Azul LNG (Liquefied Natural Gas) receiving terminal in Baja California provides yet another source of supply for California and also Mexico" (California Gas and Electric Utilities, 2018, p. 12).

The Proposed Action'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.

Transportation Energy

At buildout, the Proposed Action'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 Action and that its location near existing bus transit stops and, as described in the Transportation section of this document, would not result in a significant transportation impact.

The Proposed Action'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.

Socioeconomics and Environmental Justice

The previously prepared EA determined no impact would occur in regard to environmental justice. Therefore, the Project would have no cumulative impact regarding environmental justice. There would be a less than significant cumulative impact regarding displacement because residents displaced by the Project would have the right to return upon its completion.

Geology and Soils

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

Construction and implementation of the Project has the potential to temporarily increase erosion of soils through ground disturbance. However, this impact is anticipated to be short-term and minor, due to the implementation of erosion and sediment control BMPs. The Project also has the potential to expose a greater number of people to a seismically hazardous area by allowing a larger population to live on the Project Site (compared to existing conditions); however, this potential risk is ubiquitous throughout southern California and construction and implementation of the Project would not add to the cumulative potential impacts on the population, from exposure to seismic hazards. 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.

Ground-disturbing activities such as grading and excavation during construction of the Proposed Action 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 Action would have a less than significant impact to paleontological resources and therefore, a less than significant cumulative impact to paleontological resources.

Greenhouse Gas 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.

As was shown in **Section 4.6.3.3** of the Draft EIR, 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.

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.

Land Use and Planning

There are seven related projects that were considered in the cumulative analysis for the Proposed Action. 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 Action, 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 Proposed Action 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.

Noise

Cumulative construction impacts could occur if other construction projects were active concurrently with development of the Proposed Action, 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.

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 and are stated above.

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

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

Public Health and Safety

Regarding cumulative impacts on fire protection, compliance with the Los Angeles Building Code and LAFD standards is mandatory and routinely conditioned upon projects when they are approved. The LAFD will review development plans to ascertain the nature and extent of any additional requirements. The Proposed Action, once operational, will be periodically inspected by the Fire Department. Additionally, other development projects would be required to pay applicable fire department impact fees, which would reduce potential impacts on fire services. Regarding cumulative impacts from hazards and hazardous materials, implementation of other projects would require complying with existing local, state, and federal regulations regarding hazardous materials handling and disposal. Regarding cumulative noise impacts, 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. Therefore, cumulative impacts related to public health and safety would be less than significant.

Public Services

Below is a summary of cumulative impacts for each of the respective public services listed below.

Public Services - Fire Protection

There are seven related projects that were considered in the cumulative analysis for the Proposed Action. 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 Action, the cumulative projects would be required to comply with relevant land use policies and regulations and would be subject to CEQA review. As discussed in Section 4.11.a.3 of the Draft EIR, the Project would be consistent with applicable federal, state and local standards and regulations related to fire protection services and facilities in the City of Los Angeles.

Implementation of the Proposed Action 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.

Public Services - Police Protection

There are seven related projects that were considered in the cumulative analysis for the Proposed Action. 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 Action, the cumulative projects would be required to comply with relevant federal, state and local standards, policies and regulations and would be subject to CEQA review. The Project would be consistent with applicable standards and regulations that regulate the provision of police protection services and facilities in the City of Los Angeles.

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

Implementation of the Proposed Action 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.

Public Services - Schools

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

Based on existing enrollment and capacity data from LAUSD, the schools serving the Project and the seven cumulative projects would not have adequate capacity. Specifically, with the addition of students generated by the Project in combination with the seven related projects, Glen Alta Elementary School would have a seating shortage of 70 students (i.e., existing seating shortage of 43 students in addition to a net increase of 27 students from the Proposed Action). The cumulative

(i.e., related) projects would not generate new students because none of the seven projects fall within the attendance boundaries for Glen Alta Elementary School. Wilson High School and Abraham Lincoln High School would have a seating shortage of 825 students (i.e. existing seating shortage of 673 seats in addition to the Project's 12 students, plus related project's student generation of 140 students.

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

Cumulative growth would increase the demand for LAUSD school services in the vicinity of the Project Site. However, the Project is estimated to comprise a small percentage (approximately 6.7 percent) 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.

Public Services - 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, Attachment F). Similar to the Proposed Action, the cumulative projects would be required to comply with relevant land use policies and regulations and would be subject to CEQA review. As discussed in Section 4.11.d.3 of the Draft EIR, the Project would be consistent with standards and regulations contained in existing planning documents that regulate the provision of parks and recreation facilities in the City of Los Angeles.

Given the proximity of the Project to Rose Hill Recreation Center and Ernest E. Debs Regional Park, extraordinary care would be taken to limit construction impacts and protect access to those parks. mitigation measure **PS-3** (provided in Section 4.11.d.5 of the Draft EIR) would reduce potential impacts on nearby park/recreation access to a less than significant level.

Implementation of the Proposed Action 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 parks and recreation facilities would be less than significant and would not be cumulatively considerable.

Public Services - Libraries

There are seven cumulative projects that were considered in the cumulative analysis for the Proposed Action. The cumulative projects generally consist of infill development including apartments, single-family homes, mixed use, retail, office and school uses (KOA, 2019, Attachment F). As mentioned in the response letter received from LAPL (refer to Appendix N4 of the DEIR), any

increase in the residential population that is in close proximity to a library has a direct impact on library services. The LAPL does not specify any facilities criteria based on employment in a library's service area. Employees generated by the non-residential cumulative projects would be more likely to use library facilities near their places of residence. Students and staff generated by the educational cumulative projects would be more likely to utilize library services provided by the educational facilities. Therefore, the non-residential cumulative projects would not substantially contribute to the Project's cumulative demand for library services.

The estimated population resulting from the cumulative projects identified in Section 3.0 of the Draft EIR, 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, 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 Action'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 based on the location of the cumulative project sites relative to the location of the three libraries. Taking a more conservative approach for the purpose of this analysis, and assuming that all the 880 new residents would utilize the El Sereno Branch Library (which is located closest to the Project Site), rather than being distributed among all three nearby libraries, the service population of the El Sereno Branch library would increase to 24,134. This would still be below the design capacity criterion for the El Sereno Branch library facility and would not trigger the LAPL Branch Facilities Plan threshold (e.g., a service population of 90,000) for requiring a new branch library.

Similar to the Proposed Action, the cumulative projects would be required to comply with relevant policies and regulations and would be subject to CEQA review. The cumulative projects would also generate tax revenues for the City, a portion of which goes to fund City library facilities and services. The cumulative projects would also be required to pay the ad hoc fee of \$200 per capita for the population associated with new development, to be used for staff, books, computers, and other library materials (Granger, 2018 and Appendix N4 of the DEIR).

For the reasons discussed above, implementation of the Proposed Action 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.

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. The Project requires mitigation measures **TRANS-1** through **TRANS-3** to reduce potential construction-related impacts to a less than significant level. Implementation of mitigation measure **TRANS-1** would result in less than significant construction traffic-related impacts to the intersection of Monterey Road and Huntington Drive. With implementation of mitigation measure **TRANS-2** during the Project construction phase, the Project would have less than significant temporary construction-related parking impacts.

Implementation of mitigation measure **TRANS-3** would result in less than significant impacts on vehicle, pedestrian, and bicycle flow, during the construction phase of the project. Therefore, Project impacts would be less than cumulatively considerable.

Operation

Other projects proposed in the City of Los Angeles would be required to implement mitigation measures (as warranted) for potential long-term construction impacts regarding conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Cumulative projects would be required to reduce potential operational impacts regarding conflict with plans/programs. Therefore, Project impacts would be less than cumulatively considerable.

Emergency Access

The Proposed Action 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 Action, 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.

Tribal Cultural Resources

No TCRs have been identified within the Project Site or within the vicinity of the Project Site. 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.

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.

3.0 ALTERNATIVES CONSIDERED

3.1 Non-Historically Compliant Rehabilitation Alternative

This alternative would redevelop the existing units at Rose Hill Courts, but not in a way that would preserve the historic integrity of the property. However, the Non-Historically Compliant Rehabilitation Alternative would retain the existing 100 units on the Project Site and would not allow for the opportunity to increase the number of affordable housing units on the Project Site.

Short-term Impacts: This alternative would result in short term impacts related to construction improvements that would occur during rehabilitation of the existing units on the Project Site. Under this alternative there would be reduced short-term (construction) impacts compared to the Proposed Action for the following; aesthetics, air quality, cultural resources, geology/soils, greenhouse gas emissions, noise, fire protection, police protection, schools, libraries, transportation, tribal cultural resources, wildfire, and energy.

Long-term Impacts: The Non-Historically Compliant Rehabilitation Alternative would lead to changes in the existing building materials currently used on the Project Site. This alternative would improve the aesthetic conditions on the Project Site but would not retain the historic integrity. Alternative 2 would implement the same mitigation measures as the Proposed Action to reduce impacts associated with historical resources, however, Alternative 2 would still have significant and unavoidable aesthetic impacts on existing visual character of the site and its surroundings due to the impact on the historic property as a whole. Therefore, impacts would be similar to the aesthetic and cultural resource impacts of the Proposed Action, which would be significant and unavoidable after mitigation.

3.2 Historic Rehabilitation Alternative

This alternative would rehabilitate the existing units at Rose Hill Courts in conformance with the Standards so the historic integrity of the property would be retained. This alternative would rehabilitate the planning and design principles of the Garden City and Modern movements utilized in the Rose Hill Courts development. The Historic Rehabilitation Alternative would retain the existing 100 units on the Project Site and would not allow for the opportunity to increase the number of affordable housing units on the Project Site.

Short-term Impacts: This alternative would result in short term impacts related to construction improvements that would occur during rehabilitation of the existing units on the Project Site. Under this alternative there would be reduced short-term (construction) impacts compared to the Proposed Action for the following; aesthetics, air quality, cultural resources, geology/soils, greenhouse gas emissions, noise, fire protection, police protection, schools, libraries, transportation, tribal cultural resources, wildfire, and energy.

Long-term Impacts: This alternative would improve the aesthetic conditions on the Project Site and would retain the historic integrity of the property. This alternative includes the removal of exterior “mansard” roofs at the patios and replacement of non-historic windows with historic compliant windows. This alternative would retain the historic integrity and therefore would avoid the aesthetic impact on historic resources. Therefore, Alternative 3 would have no impacts on cultural resources and existing visual character of the site and its surroundings, and would be less than the Proposed

Action's impacts on aesthetics and cultural resources, which would be significant and unavoidable after mitigation.

3.3 No Project/No Action Alternative

No Project/No Action Alternative

This alternative would involve the continuation of uses on the site; therefore, existing buildings and tenants would remain at the Project Site and no new buildings or uses would be constructed or demolished.

Short-term Impacts: None because nothing would change compared to existing conditions.

Long-term Impacts: None because nothing would change compared to existing conditions.

4.0 FINDINGS AND DECISION

The Los Angeles Housing + Community Investment Department (HCID), as the Responsible Entity, has determined that it will implement the Proposed Action Alternative. The basis for HCID's decision includes its review of the purpose and need, the environmental impacts of the alternatives, the ability of the alternatives to meet the project purpose and need, economic and technical factors, and the public comments received on the DEIS and throughout the planning process.

Summary of the Proposed Action

The purpose and need, as described in Section 1.2 of this document, is focused on the need for redevelopment of Rose Hill Courts public housing, including replacement of deteriorating public housing at Rose Hill Courts.

The proposed two-phase Project includes the demolition of Rose Hill Courts' existing 15 structures and subsequent construction of 185 housing units onsite (183 of which would be affordable and two units of which would be unrestricted manager's units). The Proposed Action proposes nine buildings that would include a total of 88 one-bedroom units, 59 two-bedroom units, 30 three-bedroom units, and eight four-bedroom units. The Proposed Action would also include a 6,366-square-foot Management Office/Community Building and a "Central park" green space, creating a park-like setting for residents. The Proposed Action would provide a total of 174 parking spaces onsite, with at-grade and tuck-under parking; upgraded lighting, fencing, signage, and security features; and storm drain and utility improvements. The new sustainably-designed buildings would be energy efficient and the landscaping would include water-efficient irrigation. Rose Hill Courts was constructed in 1942 by HACLA as a low-income public housing project. The Rose Hill Courts complex is located at 4446 Florizel Street, on a 5.24-acre site. The site is located within the Community Plan, in the El Sereno neighborhood area of the City of Los Angeles.

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

Phase I includes two residential buildings (Buildings A and B totaling 70,610 square feet). Phase II includes seven additional buildings (Buildings C through I) totaling 86,316 square feet, and Building J, which is a 6,366-square-foot Management Office/Community Building. Overall, the Proposed Action would remove approximately 79,835 square feet of existing residential floor area and construct up to 211,094 square feet of new residential floor area, resulting in a net increase of up to 131,259 square feet of new residential floor area within the Project Site. The Proposed Action would also create a total of 44,012 square feet of usable open outdoor space, 8,007 square feet of open indoor space, 9,350 square feet of private open space, and 61,369 square feet of total open space. The total landscaped area on the Project Site would be 63,653 square feet. When completed, an additional 83 affordable units would be provided as compared to the existing Rose Hill Courts complex.

The Proposed Action will meet the purpose and need and revitalize and enhance Rose Hill Courts by providing additional affordable housing units onsite. The underlying purpose of the Project is to provide more affordable housing to meet the City's affordable housing needs and to allow the current

residents the right to return after the redevelopment. The Proposed Action's specific objectives are as follows:

1. To provide a substantial increase in the number of affordable housing units than exist today at the project site, consistent with the goals of HACLA's 25-Year Vision Plan, Build HOPE, to expand affordable housing opportunities and increase the permanent affordable housing supply in Los Angeles.
2. To maximize the opportunity for existing tenants to return once the project is completed by matching their household size to a "right size" unit.
3. To assist the City of Los Angeles in meeting its affordable housing needs and goals.
4. To design the project in a manner that maximizes accessibility, energy efficiency and contemporary amenities.
5. To provide a site that enhances security and provides for safe and useable open/green space.
6. To increase and locate onsite 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.

The Proposed Action Alternative would meet these objectives by providing additional affordable housing on the project site. The Proposed Action Alternative would have beneficial environmental impacts related to socioeconomics and environmental justice through improvement of housing for low-income populations. All environmental impacts from the Proposed Action Alternative, with the exception of significant and unavoidable impacts for aesthetics, historical resources, public health and safety (short-term construction noise exposure), and noise would be reduced to a less-than-significant level through adherence to adopted laws and regulations and compliance with the mitigation measures specified in the FEIS. All mitigation measures within the FEIS are considered feasible and will be adopted and implemented. A mitigation monitoring and reporting program, included in Appendix A to this ROD, sets out the mitigation measures that will be adopted and implemented, identifies who will implement and monitor mitigation measures and contains the schedule for implementation and monitoring of mitigation measures.

Environmentally Preferable Alternative and Alternatives Comparison

Pursuant to NEPA [40 CFR § 1502.14(e)] a Draft EIS must identify the agency's preferred alternative or alternatives, if one or more exists, unless another law prohibits the expression of such a preference. NEPA Guidelines (43 CFR Section 46.30) state that the agency's preferred alternative is not necessarily the "environmentally preferable alternative". NEPA does not require the decisionmaker to select the environmentally preferable alternative or prohibit adverse environmental effects.

Per 43 CFR Section 46.30, the environmentally preferable alternative is the alternative required by 40 CFR 1505.2 to be identified in a record of decision (ROD), that causes the least damage to the biological and physical environment and best protects, preserves, and enhances historical, cultural,

and natural resources. The environmentally preferable alternative is identified upon consideration and weighing by the Responsible Official of long-term environmental impacts against short-term impacts in evaluating what is the best protection of these resources. In some situations, such as when different alternatives impact different resources to different degrees, there may be more than one environmentally preferable alternative.

With respect to identifying an Environmentally Preferable Alternative among those analyzed, the range of feasible alternatives includes the No Project/No Action Alternative; the Non-Historically Compliant Rehabilitation Alternative; and the Historic Rehabilitation Alternative.

Of the alternatives analyzed in, Alternative 1, the No Project/No Action Alternative would avoid all of the Project's significant environmental impacts, including the Project's significant and unavoidable impacts related to aesthetics (historical resources) and historical resources due to demolition of existing historical buildings onsite; and short-term significant and unavoidable noise impacts during construction. Although Alternative 1 would reduce most of the Project's less-than-significant and less-than-significant-with-mitigation impacts, the existing buildings will continue to require significant capital investment due to their age, and major upgrades to utilities, amenities, and energy efficiency would not occur. Furthermore, the No Project/No Action Alternative would not meet any of the Project's basic objectives.

To identify an Environmentally Preferable Alternative other than the No Project/No Action Alternative, a comparative evaluation of the remaining alternatives indicates that Alternative 3, the Historic Rehabilitation Alternative, would be the Environmentally Preferable Alternative. As discussed above, while Alternative 3 would not completely eliminate the Project's impacts that would be significant and unavoidable, given the reduction in construction activities, equipment, and duration, Alternative 3 would eliminate the Project's significant and unavoidable impacts on 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 Preferable Alternative.

However, under Alternative 3, the Project's basic purpose and need would not be met. 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 Preferable Alternative, it would not provide the greatest benefits to the low-income population that HACLA is mandated to serve.

Conclusion

HCID approves the Proposed Action as defined in this ROD and Findings Statement. In accordance with 40 CFR § 1505.2, HCID has adopted all practical means to avoid or minimize environmental harm associated with the implementation of the Proposed Action Alternative and adopts a mitigation monitoring and enforcement program (Appendix A to this document) for mitigation. HCID will ensure the effective implementation and enforcement of all mitigation measures and permit conditions. The MMRP will provide for monitoring of construction activities as necessary, onsite identification and resolution of environmental problems, and proper reporting to enforcement agencies. The MMRP would be used by the City, participating agencies, project contractors, and any mitigation monitoring personnel during implementation of the Proposed Action.

HCID finds that, on balance, the Proposed Action would best realize the underlying purpose and need as set forth in Section 1.2 of this document and the specific requirements for affordable housing objectives for the Rose Hill Courts project in consideration of economic and technical factors. The Proposed Action is both financially feasible and best addresses the specific requirements that are included in the governing documents and overarching vision for the Rose Hill Courts project site.

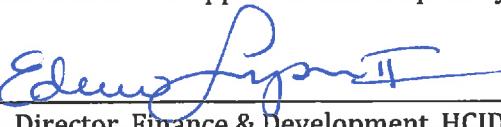
The No Project/No Action Alternative would avoid all of the Project's significant environmental impacts, including the Project's significant and unavoidable impacts related to aesthetics (historical resources) and historical resources due to demolition of existing historical buildings onsite; and short-term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

There would be unavoidable significant adverse impacts on aesthetics and cultural resources. The significant unavoidable impacts on aesthetics and cultural resources are due to demolition of the CRHR-listed existing Rose Hill Courts historic buildings. There would also be unavoidable significant adverse impacts on noise during the temporary construction phase of the Project due to onsite construction activities. After implementation of mitigation measures, the proposed Project would still have significant environment effects for impacts regarding aesthetics, cultural (historic buildings) resources, and noise during Project construction. Furthermore, cumulative impacts to aesthetics and cultural resources (due to the demolition of the historic Rose Hill Courts buildings on the Project Site) would be significant and unavoidable. HCID considers these impacts to be outweighed in light of the overall social, economic and other benefits of implementing the Proposed Action.

Having considered the DEIS and FEIS, and having considered the above written facts and conclusions relied upon to meet the requirements of the National Environmental Policy Act of 1970, as amended (42 U.S.C. 4371 et seq.), HCID certifies that: consistent with social, economic and other essential considerations from among the reasonable alternatives available, the Proposed Action avoids or minimizes adverse environmental impacts to the maximum extent practicable by incorporating as conditions to the decision those mitigation measures that were identified in the EIS as practicable.

Based on the foregoing determinations and findings and the entire environmental review record, HCID hereby approves the Proposed Action Alternative in accordance with the above-referenced applicable statutory and regulatory requirements in order to facilitate redevelopment of Rose Hill Courts.

The above ROD and Findings Statement was approved and adopted by HCID on the following date:

Certifying Officer Signature: 
Name/Title: Edwin C. Gipson, Director, Finance & Development, HCIDLA

Date: 1/23/2020

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).

**ATTACHMENT A
MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)**

IV. Mitigation Monitoring and Reporting Program

IV. MITIGATION MONITORING AND REPORTING PROGRAM

1. Introduction

This Mitigation Monitoring and Reporting Program (MMRP) has been prepared pursuant to Public Resources Code Section 21081.6, which requires a Lead Agency to adopt a “reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment.” Additionally, Section 15097(a) of the State CEQA Guidelines requires that a public agency adopt a program for monitoring or reporting mitigation measures and project revisions, which it has required to mitigate or avoid significant environmental effects. This MMRP has been prepared in compliance with the requirements of CEQA, Public Resources Code Section 21081.6 and Section 15097 of the State CEQA Guidelines. This MMRP has been updated based on changes made earlier in this Final EIR.

The Housing Authority of the City of Los Angeles is the Lead Agency for the Project and is therefore responsible for administering and implementing the MMRP. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity that accepts the delegation; however, until mitigation measures have been completed, the Lead Agency remains responsible for ensuring implementation of mitigation measures in accordance with the MMRP.

An Environmental Impact Report (EIR) has been prepared to address the potential environmental impacts of the Project. The evaluation of the Project’s impacts in the EIR takes into consideration the project design features (PDFs) and applies mitigation measures (MMs) needed to avoid or reduce potentially significant environmental impacts. This MMRP allows for monitoring implementation of the PDFs and MMs required for the Project.

2. Organization

As shown on the following pages, each identified PDF and MM for the Project is organized by environmental impact area, with the following details:

- Responsible Party—the party that is responsible for implementing the project design feature or mitigation measure.
- Monitoring Party—the agency to which reports involving feasibility, compliance, implementation, and development are made.
- Implementation Stage—the phase of the Project during which mitigation measure shall be monitored.

3. Administrative Procedures and Enforcement

This MMRP shall be enforced throughout all phases of the Project, as applicable. The project Applicant shall be responsible for implementing each PDF and MM and shall be obligated to provide certification, as identified below, to the applicable monitoring and enforcement agencies. Furthermore, the Applicant shall maintain records demonstrating compliance with each PDF and MM. Such records shall be made available to the City of Los Angeles upon request.

During the construction phase and prior to the issuance of building permits, the Applicant shall retain an independent Construction Monitor (either via the City or through a third-party consultant),

approved by the Housing Authority of the City of Los Angeles, who shall be responsible for monitoring implementation of PDFs and MMs during construction activities consistent with the monitoring phase and frequency set forth in this MMRP.

The Construction Monitor shall also prepare documentation of the Applicant's compliance with the PDFs and MMs during construction every 90 days in a form satisfactory to the Housing Authority of the City of Los Angeles. The documentation must be signed by the Applicant and Construction Monitor and be included as part of the Applicant's Compliance Report. The Construction Monitor shall be obligated to immediately report to the Enforcement Agency any non-compliance with the MMs and PDFs within two business days if the Applicant does not correct the non-compliance within a reasonable time of notification to the Applicant by the monitor or if the non-compliance is repeated. Such non-compliance shall be appropriately addressed by the Enforcement Agency.

4. Program Modification

After review and approval of the final MMRP by the Lead Agency, minor changes and modifications to the MMRP are permitted, but can only be made subject to approval by the Lead Agency. The Lead Agency, in conjunction with any appropriate agencies or departments, will determine the adequacy of any proposed change or modification. This flexibility is necessary in light of the nature of the MMRP and the need to protect the environment. No changes will be permitted unless the MMRP continues to satisfy the requirements of CEQA, as determined by the Lead Agency.

The Project shall be in substantial conformance with the PDFs and MMs contained in this MMRP. The enforcing departments or agencies may determine substantial conformance with PDFs and MMs in the MMRP, at their discretion and within reason. If the department or agency cannot find substantial conformance, a PDF or MM is allowed to be modified or deleted as follows: the enforcing department or agency, or the decision maker for a subsequent discretionary project related approval finds that the modification or deletion complies with CEQA, including CEQA Guidelines Sections 15162 and 15164, which could include the preparation of an addendum or subsequent environmental clearance, if necessary, to analyze the impacts from the modifications to or deletion of the PDFs or MMs. Any addendum or subsequent CEQA clearance shall explain why the PDF or MM is no longer needed, not feasible, or the other basis for modifying or deleting the PDF or MM. Under this process, the modification or deletion of a PDF or MM shall not, in and of itself, require a modification to any Project discretionary approval unless the Director of Planning also finds that the change to the PDF or MM results in a substantial change to the Project or the non-environmental conditions of approval.

5. Mitigation Monitoring and Reporting Program

Issue Area	Project Design Features (PDFs) or Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
PROJECT DESIGN FEATURES				
Air Quality				
Construction Equipment Permitting and Registration	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.	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF
Greenhouse Gas Emissions				
Energy Conservation and Efficiency	GHG-PDF-1 Project design will provide an energy efficiency exceeding Title 24, Part 6, California Energy Code baseline standard requirements, based on the 2016 Building Energy Efficiency Standards requirements. ¹	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF
Energy Conservation and Efficiency	GHG-PDF-2 Use of high-efficiency Energy Star appliances, where appropriate.	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF
Water Conservation	GHG-PDF-3 Inclusion of water conservation measures in accordance with the Los Angeles Department of Water and Power requirements for new development in the City of Los Angeles (e.g., high-efficiency fixtures and appliances, weather-based irrigation systems, drought-tolerant landscaping).	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF

¹ For analysis purposes, a value of 10% more efficient than Title 24 was used in the CalEEMod model.

❖ MITIGATION MONITORING AND REPORTING PROGRAM ❖

Issue Area	Project Design Features (PDFs) or Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
Water Conservation	GHG-PDF-4 Use of drought-tolerant plants and indigenous species, stormwater collection, permeable pavement wherever possible, and stormwater filtration, storage and re-use for landscaping.	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF
Water Conservation	GHG-PDF-5 Use of high-efficiency toilets, including dual-flush water closets, as appropriate.	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF
Water Conservation	GHG-PDF-6 Use of high-efficiency showerheads at 1.5 gallons per minute. Install no showers with multiple showerheads.	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF
Water Conservation	GHG-PDF-7 Use of high-efficiency Energy Star appliances, where appropriate.	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF
Water Conservation	GHG-PDF-8 Use of weather-based irrigation controller with rain shutoff, matched precipitation (flow) rates for sprinkler heads, and rotating sprinkler nozzles or comparable technology such as drip/micro spray/subsurface irrigation where appropriate.	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF
Water Conservation	GHG-PDF-9 Installation of a separate water meter (or submeter), flow sensor, and master valve shutoff for irrigated landscape areas totaling 5,000 square feet and greater.	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF
Water Conservation	GHG-PDF-10 Use of proper hydro-zoning and turf minimization, as feasible.	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF
Water Quality	GHG-PDF-11 Installation of pre-treatment stormwater infrastructure for the stormwater treatment system.	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF

❖ MITIGATION MONITORING AND REPORTING PROGRAM ❖

Issue Area	Project Design Features (PDFs) or Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
Water Quality	GHG-PDF-12 Reduce stormwater runoff through the introduction of new landscaped areas throughout the Project Site and/or on the structure.	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF
Air Quality	GHG-PDF-13 Prohibit the use of any fireplaces in the proposed residential units.	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF
Recreation and Parks				
Recreation and Parks	Recreation and Parks PDF-1 Not less than 90 days prior to the anticipated construction completion the Project Applicant will reach out to the City of Los Angeles Department of Recreation and Parks staff responsible for the programming (if any) at various neighborhood, community, and regional parks located within a 2-mile radius of the Project site to consider mutually beneficial partnership between park programs, operations, and improvements. These parks and recreation facilities include, but are not limited to, El Sereno Arroyo Playground, El Sereno Community Gardens, Henry Alvarez Memorial Park, Hermon Dog Park, Hermon Park, Arroyo Seco Park, Carlin G. Smith Recreation Center, Cypress Recreation Center, Cypress Recreation Center, Downey Recreation Center, Ascot Hills Park and Charles F. Lummis Home.	Not Applicable because this is a PDF	Not Applicable because this is a PDF	Not Applicable because this is a PDF
Energy				
Thresholds 4.15.3.3 (a) and (b): (a): Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy	Refer to Project Design Features listed above, which are reproduced under Greenhouse Gases: GHG-PDF-1 through GHG-PDF-10 above.	Refer to GHG-PDF-1 through GHG-PDF-10 above.	Refer to GHG-PDF-1 through GHG-PDF-10 above.	Refer to GHG-PDF-1 through GHG-PDF-10 above.

❖ MITIGATION MONITORING AND REPORTING PROGRAM ❖

Issue Area	Project Design Features (PDFs) or Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
<p>resources, during Project construction or operation?</p> <p>(b) Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?</p>				
MITIGATION MEASURES				
Aesthetics				
<p>Threshold 4.1.3.3 (b): <i>Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?</i></p>	<p>Refer to Mitigation Measures CUL-1 and CUL-2 below.</p>	<p>Significant and Unavoidable regarding Historic Architectural Resources</p>	<p>Refer to MM CUL-1 and CUL-2 below.</p>	<p>Refer to MM CUL-1 and CUL-2 below.</p>
Biological Resources				
<p>Threshold 4.3.3.3 (a): <i>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?</i></p>	<p>MM BR-1: Nesting Bird Surveys</p> <p>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.</p> <p>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-</p>	<p>Less Than Significant</p>	<p>Project Applicant/ The Housing Authority of the City of Los Angeles (HACLA)</p>	<p>Prior to commencement of Project construction and throughout the duration of construction activities that result in tree or vegetation removal</p>

❖ MITIGATION MONITORING AND REPORTING PROGRAM ❖

Issue Area	Project Design Features (PDFs) or Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	<p>game nesting birds, and their nests, young, and eggs, the following measures shall be implemented.</p> <ul style="list-style-type: none"> • 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 			

❖ MITIGATION MONITORING AND REPORTING PROGRAM ❖

Issue Area	Project Design Features (PDFs) or Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	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.			
Threshold 4.3.3.3 (a): <i>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?</i>	MM BR-2: Biological Monitor <ul style="list-style-type: none"> • 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 	Less Than Significant	Project Applicant/HACLA	If Project activities begin during nesting bird season (generally February 1 – August 31), no later than one week prior to ground-disturbing activities

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	<p>relevant project permits and reports are in place and are adhered to.</p> <ul style="list-style-type: none"> 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. 			
Cultural Resources				
<i>Threshold 4.4.3.3 (a): Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?</i>	MM CUL-1: The Project Applicant shall prepare an interpretive display and install it in the new community building on the redeveloped Rose Hill Courts property. The interpretive display shall be completed to coincide with the opening of the community building once construction is complete. It shall include a brief history of the historic property, its significance in the contexts of public and defense worker housing in Los Angeles during the Second World War and public housing design related to the Garden City and Modern movements, and a description	Significant and Unavoidable regarding Historic Architectural Resources	Project Applicant/HACLA and HCID	After Project construction is complete

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	<p>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 PA Stipulation I.A.)</p>			
<p>Threshold 4.4.3.3 (a): <i>Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?</i></p>	<p>MM CUL-2: HACLA shall add to its existing website a section dedicated to the history of HACLA and public housing in Los Angeles within six (6) months from the issuance of the Certificate of Occupancy for the Rose Hill Courts Redevelopment Project. The website shall provide content on the history of the agency, the significance of public housing in the City, and notable examples of public housing architecture and site planning. It shall include links to other scholarly sources of information on the history and design of public housing. The new website section shall be professionally written, illustrated, and designed. The content shall be prepared by persons meeting the SOI Professional Qualifications Standards for History or 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</p>	<p>Significant and Unavoidable regarding Historic Architectural Resources</p>	<p>HACLA/HCID</p>	<p>Within six months of completing the Rose Hill Courts Redevelopment Project</p>

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	website section is complete, HACLA shall publicize it in its monthly newsletter. (This is PA Stipulation I.B.)			
Geology and Soils				
<p>Threshold 4.5.3.3 (a) ii and iii, (c), and (d).</p> <p>Threshold 4.5.3.3 (a): Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:</p> <ul style="list-style-type: none"> ii) Strong seismic ground shaking? iii) Seismic-related ground failure, including liquefaction? <p>Threshold 4.5.3.3 (c): Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?</p> <p>Threshold 4.5.3.3 (d): Would the project be located on expansive soil, as defined in Table 18 1B</p>	<p>MM GEO-1: Prior to issuance of grading permits, the Applicant shall submit final design plans and a final design-level geotechnical report to the Los Angeles Department of Building and Safety for review and approval. The design-level geotechnical report shall be used for final design of the foundation system for the structures and 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</p>	Less Than Significant		

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<p><i>of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?</i></p>	<p>May 16, 2018 (Revised January 2019), including, but not limited to the following:</p> <ul style="list-style-type: none"> • 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 			

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	<p>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.</p> <ul style="list-style-type: none"> • 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 corosions protection 			

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	<p>as determined by a qualified corrosion engineer.</p> <ul style="list-style-type: none"> • 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. 			

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Issue Area	Project Design Features (PDFs) or Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	<ul style="list-style-type: none"> • 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. 			

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Issue Area	Project Design Features (PDFs) or Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	<ul style="list-style-type: none"> • 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. 			
<i>Threshold 4.5.3.3 (f):</i> <i>Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?</i>	MM PALEO-1: A qualified paleontologist (approved by the City or County of Los Angeles, as applicable, and the Los Angeles County Natural History Museum Vertebrate Paleontology Department) shall be retained prior to excavation and grading activities at the Project Site. <ul style="list-style-type: none"> • 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 	Less Than Significant	Project Applicant/HACLA	Project grading/construction

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	<p>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.</p> <ul style="list-style-type: none"> • 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 			

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	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.			
Hazards and Hazardous Materials				
Threshold 4.7.3.3 (b): <i>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?</i>	MM HAZ-1: Due to the presence of lead in the soil at the Project Site, a Soil Management Plan (SMP) shall be prepared. Prior to the commencement of grading and excavation, the Project Applicant shall retain a qualified environmental consultant to prepare a SMP that complies with all applicable regulatory requirements. The SMP shall be submitted to the City of Los Angeles Department of Building and Safety for review and approval prior to the commencement of excavation and grading activities. The SMP shall contain the following: <ul style="list-style-type: none"> • The recommendations of the HHMD and LAFD. • The SMP shall require that the Project Applicant remove and properly dispose of impacted materials in accordance with 	Less Than Significant	Project Applicant/City of Los Angeles Department of Building and Safety	Prior to the submittal of building plans to the City of Los Angeles Department of Building and Safety

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	<p>applicable requirements of the DTSC, County of Los Angeles Fire Department and the South Coast Air Quality Management District.</p> <ul style="list-style-type: none"> • 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. 			

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Threshold 4.7.3.3 (b): <i>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?</i>	MM HAZ-2: Prior to issuance of the Building Permit(s), the Project Applicant shall consult with the City of Los Angeles Department of Building and Safety regarding radon at the Project Site. After construction of each Phase, radon testing shall be conducted on the Project Site to confirm if radon concentrations in the new buildings on the Project Site exceed the USEPA action level of 4.0 pCi/L. The results of the radon tests shall be provided to the City of Los Angeles Department of Building and Safety. The Project Applicant shall implement any recommendations from the City of Los Angeles Department of Building and Safety regarding radon.	Less Than Significant	Project Applicant / City of Los Angeles Department of Building and Safety	Prior to the submittal of building plans to the City of Los Angeles Department of Building and Safety
Noise				
Threshold 4.10.3 (a): <i>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?</i>	MM N-1: The construction contractor will conduct noise monitoring near sensitive receivers identified for this Project, during the suspected noise producing construction activities. During times that active construction equipment is within 200 feet of a residence or other sensitive receiver, noise measurements will be taken for at least three 15-minute periods per hour for two hours. If the monitored noise levels exceed background (ambient) noise levels by 5 dB or more 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.)	Potentially Significant sometimes during Project construction	Project Applicant/HACLA and City of Los Angeles Planning Department	During Project construction
Threshold 4.10.3 (a): <i>Would the Project result in generation of a substantial temporary or permanent increase in</i>	MM N-2: The construction contractor will use the following source controls, in response to complaints and/or when ambient noise monitoring of complainant's exposure shows that noise from construction exceeds ambient	Potentially Significant sometimes during Project construction	Project Applicant/HACLA and City of Los Angeles Planning Department	During Project construction

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<i>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?</i>	<p>levels by at least 5 dBA, except where not physically feasible:</p> <ul style="list-style-type: none"> • 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. 			

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<p>Threshold 4.10.3 (a): <i>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?</i></p>	<p>MM N-3: The contractor will use the following path controls, in response to complaints and when ambient noise monitoring of complainant's exposure shows exceedance of local standards, except where not physically feasible:</p> <ul style="list-style-type: none"> • Install portable noise barriers, including solid structures and noise blankets, between the active noise sources and the nearest noise receivers. • Temporarily enclose localized and stationary noise sources. • Store and maintain equipment, building materials and waste materials as far as practical from as many sensitive receivers as practical. 	Potentially Significant sometimes during Project construction	Project Applicant/HACLA and City of Los Angeles Planning Department	During Project construction
<p>Threshold 4.10.3 (a): <i>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?</i></p>	<p>MM N-4: Advance notice of the start of construction shall be delivered to all noise sensitive receivers adjacent to the Project area. The notice shall state specifically where and when construction activities will occur, and provide contact information for filing noise complaints with the contractor and the City.</p>	Potentially Significant sometimes during Project construction	Project Applicant/HACLA and City of Los Angeles Planning Department	During Project construction

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Threshold 4.10.3 (a): <i>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?</i>	MM N-5: Before issuance of a building permit, the building contractor shall prepare, and the City shall review and approve, a Construction Noise Control Plan. The plan shall include and describe in detail how mitigation measures N-1 through N-4 will be implemented.	Significant and Unavoidable sometimes during Project construction	Project Applicant/HACLA and City of Los Angeles Planning Department	During Project construction
Public Services - Police Protection				
Threshold 4.11.b.3.1 (a): <i>Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for Police protection?</i>	MM PS-1: Temporary construction fencing shall be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area.	Less than significant	Project Applicant/ HACLA	Prior to the commencement of Project construction

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Threshold 4.11.b.3.1 (a): <i>Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for Police protection?</i>	MM PS-2: Project plans shall incorporate the "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", published by the LAPD relative to security, semi public and private spaces, which may include but not be limited to, access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high foot-traffic areas. These measures shall be approved by the City of Los Angeles Police Department prior to the issuance of building permits.	Less than significant	Project Applicant/HACLA and City of Los Angeles Police Department	Prior to the issuance of building permits by the City of Los Angeles
Public Services - Recreation and Parks				
Threshold 4.11.d.3.3 (a), (b) and (c): <i>(a) Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios,</i>	MM PS-3: During Project construction the construction contractor shall ensure that access to Rose Hill Recreation Center, Rose Hill Park, and Ernest Debs Regional park is maintained for the public. If access to these facilities is temporarily blocked off during construction, the construction contractor shall ensure that an alternate route is available for public access and the contractor shall provide signs clearly marking the alternate route to the park/recreation facilities.	Less than significant	Project Applicant/HACLA	During Project construction

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<p><i>response times or other performance objectives for parks?</i></p> <p>Threshold (b): Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?</p> <p>Threshold (c): Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?</p>				

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Transportation				
Threshold 4.15.3 (a): <i>Would the Project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?</i>	MM TRANS-1: Prior to the commencement of Project construction, the Project Applicant for the Project will submit a detailed Construction Management Plan (with copy to HACLA) to be reviewed and approved by LADOT. In the Construction Management Plan, it will specify that the Construction Manager will schedule truck traffic and employee shifts to avoid creating trips during the peak traffic periods, as is feasible for construction operations. All measures including identified truck routes and designated employee parking areas must be included in the Construction Management Plan.	Less than significant	Project Applicant/ City of Los Angeles	Prior to issuance of a demolition permit
Threshold 4.15.3 (a): <i>Would the Project conflict with a program plan, ordinance or policy address the circulation system, including transit, roadway, bicycle and pedestrian facilities?</i>	MM TRANS-2: Prior to issuance of a demolition permit, the Project applicant shall submit to the City of Los Angeles Planning Department (with copy to HACLA) and the Planning Department shall approve a construction management schedule. The schedule shall include a street closure plan that details how vehicle traffic (including bus traffic, and potential temporary bus stop closure or relocation along Mercury Avenue), pedestrian traffic, and bicycle traffic will flow during temporary street closures during both Phase I and Phase II of Project construction.	Less than significant	Project Applicant/ City of Los Angeles Department of City Planning	Prior to issuance of a demolition permit
Threshold 4.15.3 (c): <i>Would the Project result in inadequate emergency access?</i>	MM TRANS-3: Prior to issuance of a grading permit, the Project applicant shall submit to the City of Los Angeles Department of City Planning (with copy to HACLA) a construction management schedule that details truck traffic and employee shifts to avoid creating trips during the PM peak period. The schedule will specify that all truck trips shall be completed before 3:00 p.m. each day to avoid both employee and truck trips being generated during the PM peak period.	Less than significant	Project Applicant/City of Los Angeles Department of City Planning	Prior to issuance of a grading permit