

FINAL ENVIRONMENTAL IMPACT STATEMENT (EIS) (SCH # 2018091035)

FOR THE ROSE HILL COURTS REDEVELOPMENT PROJECT



CEQA LEAD AGENCY

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



NEPA LEAD AGENCY

**Los Angeles Housing + Community Investment
Department (HCID)**
1200 West 7th Street, 1st Floor
Los Angeles, CA 90017
*Responsible Entity for the United States Department of
Housing and Urban Development (HUD)*

PREPARED BY:



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

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I. Introduction

I. INTRODUCTION

The Los Angeles Housing + Community Investment Department (HCID), the Lead Agency, must prepare a Final EIS before approving a project. The purpose of a Final EIS is to provide an opportunity for the lead agency to respond to comments made by the public and agencies regarding the Rose Hill Courts Redevelopment Project Draft EIS. This Final EIS includes revisions to the Draft EIS; a list of persons, organizations, and agencies that provided comments on the Draft EIS; comments and recommendations received regarding the Draft EIS; and responses to significant environmental points raised in the comments received.

This Final EIS constitutes the second part of the EIS for the Project and is intended to be a companion to the Draft EIS. The Draft EIS for the Project, which circulated for public review and comment from September 20, 2019 through November 12, 2019, constitutes the first part of the EIS and is incorporated by reference and bound separately.

1. Organization of the Final EIS

This Final EIS is organized into the following four sections:

Section I. Introduction—This section describes the purpose of the Final EIS, outlines the contents of the Final EIS, summarizes the Final EIS process, and provides a summary of the proposed Project.

Section II. Responses to Comments—This section provides a matrix depicting those individuals and entities that commented on the Draft EIS and the issues that they raised. This matrix is followed by verbatim numbered copies of the comments followed by numbered responses to each of the written comments made about the Draft EIS. Copies of the full original comment letters are provided in **Appendix FEIS-1** of this Final EIS.

Section III. Revisions, Clarifications, and Corrections—This section discusses how no revisions need to be made to the Draft EIS based on public comments.

As detailed in this Final EIS, neither the comments submitted on the Draft EIS, or the responses to these comments, constitute new significant information warranting recirculation of the Draft. Rather, the Draft EIS is comprehensive and has been prepared in accordance with NEPA.

This Final EIS includes the following appendices:

Appendix FEIS-1	Draft EIS Comment Letter
Appendix FEIS-2	Open House Meeting Flyer
Appendix FEIS-3	Open House Fact Sheet
Appendix FEIS-4	Open House Photos
Appendix FEIS-5	Open House Summary Memo

Appendix FEIS-1. Draft EIS Comment Letter—This appendix to the Final EIS includes a copy of the one comment letter received on the Draft EIS.

Appendix FEIS-2. Open House Meeting Flyer—This appendix to the Final EIS includes a copy of the open house meeting flyer that was disseminated to residents of Rose Hill Courts and neighboring properties.

Appendix FEIS-3. Open House Fact Sheet—This appendix to the Final EIS includes a copy of the Fact Sheet handed out at the Open House held on October 8, 2019.

Appendix FEIS-4. Open House Photos—This appendix to the Final EIS includes photographs taken at the Open House.

Appendix FEIS-5. Open House Summary Memo—This appendix to the Final EIS includes a memo summarizing what occurred at the Open House.

2. Public Review Process

In accordance with NEPA, the environmental review process for the Project commenced with solicitation of comments from identified responsible and trustee agencies, as well as interested parties on the scope of the Draft EIS, through a Notice of Availability (NOA) process. A Draft EIS was prepared and an NOA was circulated for public comment to the Federal Register, responsible agencies, owners and occupants for properties within 500 feet of the site, and other interested parties from September 27 to November 12, 2019. In addition, a community meeting was held on October 4, 2019.

A Notice of Availability of the Draft EIS was published in the La Opinion Newspaper and The Daily News Newspaper and mailed to owners and occupants for properties within 500 feet of the Project Site, and interested parties, including those who attended the scoping meeting and those who requested notice. Additionally, the NOA was translated into English, Spanish, and Vietnamese and was posted during the public review period on the doors of the Rose Hill Courts Community Center at 4446 Florizel Street and was available on HACLA's website. The Draft EIR/EIS was made available for review on HACLA's website (<http://www.hacla.org/dsprojects/ID/8/Rose-Hill-Courts>), at HACLA's office at 2600 Wilshire Boulevard in Los Angeles, at Rose Hill Courts, and at the El Sereno Branch Library. The documents for the Rose Hill Courts EIS were converted to be in an "accessible" format so that those with accessibility issues could read the files online on EPA's website and HACLA's website. Following the Draft EIS public comment period, this Final EIS has been prepared and includes responses to the comments raised regarding the Draft EIS.

3. Overview of the Project

a. Existing Uses

The Project Site includes the Rose Hill Courts apartment complex (Rose Hill Courts) owned by HACLA. The Proposed Action would include the redevelopment of Project Site with up to 185 new dwelling units, open space, and associated infrastructure. The Los Angeles Housing and Community Investment Department (HCID) has been designated as the Responsible Entity by HUD for assumption of its NEPA authority and NEPA lead agency responsibility.

The Rose Hill Courts complex filled an essential need for new quality housing in the Los Angeles area during and after the Second World War, and it continues to be in use today (GPA, 2015, p. 16). The Rose Hill Courts complex consists of an administration building (i.e., offices and a common room with a kitchen, pantry, and two bathrooms) and 14 one- and two-story, wood-frame buildings with

townhouse and flat-style apartments comprising 100 units. The apartment complex was designed in the Garden City and Modern style, which was typical of public housing projects of the 40's era. Characteristics of the Garden City and Modern style include: low density; modern architectural characteristics, including the standardization and repetition of building types; and placement and orientation of the buildings on a project site to maintain low density. Rose Hill Courts by its general layout is an example of the Garden City and Modern style, since the buildings cover 19 percent of the land area, and no buildings exceed two stories (Ibid., p. 19).

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

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

b. Proposed Uses

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 the Housing Authority of the City of Los Angeles (HACLA) as a low-income public housing project. The Rose Hill Courts complex is located at 4446 Florizel Street, on a 5.24-acre site. The site is located within the 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 managers' units). Seven buildings (20 units, estimated total 17,017 square feet) and the existing administrative building (estimated 2,810 square feet) would be

demolished in Phase I. Eight buildings (80 units, estimated total 62,818 square feet) would be demolished in Phase II.

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 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 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 63,3653 square feet. When completed, an additional 83 affordable units would be provided as compared to the existing Rose Hill Courts complex.

c. Necessary Approvals

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

**Table 1-1
PERMITS AND APPROVALS**

Agency	Permit or Approval
Los Angeles Housing + Community Investment Department (HCID) NEPA Lead Agency (Designated as the Responsible Entity by the U.S. Department of Housing and Urban Development [HUD])	<ul style="list-style-type: none"> • NEPA Part 58 Compliance/Approval of the EIS (Record of Decision and Findings Statement)
Housing Authority of the City of Los Angeles (HACLA) CEQA Lead Agency	<ul style="list-style-type: none"> • Certification of the EIR • Approval of Disposition and Development Agreement • Approval of Relocation Plan for Residents • Project-based Section 8 vouchers
City of Los Angeles	<ul style="list-style-type: none"> • Demolition and Building Permits, including approval for demolition of historic buildings • Public Benefit Project with Alternative Compliance (PUB) under Los Angeles Municipal Code § 14.00B • Affordable Housing Density Bonus (SB 1818) as identified in LAMC § 12.22 A.25: Request is to allow a Density Bonus project with off-menu incentives. • Lot Tie/Lot Line Adjustment Process due to Phase I and II being on separate lots. • Permit for the removal of street trees (if required) • Haul Route approval (if necessary)
Utilities	<ul style="list-style-type: none"> • Utility coordination and permits
HUD	<ul style="list-style-type: none"> • Section 18 Demolition and Disposition of existing Rose Hill Courts • Rental Assistance Demonstration (RAD) Conversion

4. Areas of Concern

Based on the Draft EIS comment letter received regarding the Draft EIS, which is included in **Appendix FEIS-1** of this Final EIS, no issues known to be of concern were raised.

II. Responses to Comments

II. RESPONSES TO COMMENTS

A. INTRODUCTION

This section of the Final EIS provides the responses prepared by HACLA to each of the written comments received with regards to the Draft EIS.

Section II.B, Matrix of Comments Received in Response to the Draft EIS, includes a matrix that provides a summary of the issues raised by the commenter regarding the Draft Environmental Impact Statement for the Rose Hill Courts Redevelopment Project. Additionally, Section II.C, Comment Letters, provides a response to each written comment raised. A copy of the original comment letter is provided in **Appendix FEIS-1** of this Final EIS. Note various comments were received on the Draft EIR. See the Final EIR for the Rose Hill Courts Redevelopment Project

C. COMMENT LETTERS

Comment Letter No. 1

Connell Dunning, Acting Manager
Environmental Review Branch
United States Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105-3901

Comment No. 1-1

The U.S. Environmental Protection Agency has reviewed the above-referenced document pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

Response to Comment No. 1-1

This comment states an introduction to the letter. No environmental issues are raised by this comment.

Comment No. 1-2

The EPA reviewed the Notice of Intent to prepare a Draft Environmental Impact Statement (DEIS) for the proposed redevelopment project and provided scoping comments in our letter dated October 19, 2018. Our scoping letter recommended the City of Los Angeles, on behalf of the US Department of Housing and Urban Development, address several issues including fugitive dust controls, lead and asbestos hazard abatement, and evaluation of environmental justice impacts. We appreciate that the City addressed our recommendations in the DEIS.

Response to Comment No. 1-2

This comment is noted. This comment does not raise any further environmental issues and no changes are required to the Draft EIS.

Comment No. 1-3

Effective October 22, 2018, EPA no longer includes ratings in our DEIS comment letters. Information about this change and EPA's continued roles and responsibilities in the review of federal actions can be found on our website at: <https://www.epa.gov/nepalepa-review-process-under-section-309-clean-air-act>. We appreciate the opportunity to review this DEIS. When the Final EIS is released for public review, please send one copy to the address above (mail code: TW-2). If you have any questions, please contact me at (415) 947-4161, or contact Jean Prijatel, the lead reviewer for this project, at 415-947-4167 or prijatel.jean@epa.gov.

Response to Comment No. 1-3

This comment is noted.

Bracketed Comment Letter



Letter 1

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

November 8, 2019

Ms. Shelly Lo
Los Angeles Housing and Community Investment Department
1200 West 7th Street, 8th Floor
Los Angeles, California 90012

Subject: Draft Environmental Impact Report/Statement for the Rose Hill Courts Redevelopment Project, Los Angeles County, California (EIS No. 20190231)

Dear Ms. Lo:

The U.S. Environmental Protection Agency has reviewed the above-referenced document pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act. 1-1

The EPA reviewed the Notice of Intent to prepare a Draft Environmental Impact Statement (DEIS) for the proposed redevelopment project and provided scoping comments in our letter dated October 19, 2018. Our scoping letter recommended the City of Los Angeles, on behalf of the US Department of Housing and Urban Development, address several issues including fugitive dust controls, lead and asbestos hazard abatement, and evaluation of environmental justice impacts. We appreciate that the City addressed our recommendations in the DEIS. 1-2

Effective October 22, 2018, EPA no longer includes ratings in our DEIS comment letters. Information about this change and EPA's continued roles and responsibilities in the review of federal actions can be found on our website at: <https://www.epa.gov/nepa/epa-review-process-under-section-309-clean-air-act>. We appreciate the opportunity to review this DEIS. When the Final EIS is released for public review, please send one copy to the address above (mail code: TIP-2). If you have any questions, please contact me at (415) 947-4161, or contact Jean Prijatel, the lead reviewer for this project, at 415-947-4167 or prijatel.jean@epa.gov. 1-3

Sincerely,

A handwritten signature in black ink that reads "Connell Dunning".

Connell Dunning, Acting Manager
Environmental Review Branch

cc: Dhiraj Narayan, Housing Authority of the City of Los Angeles
Kathleen McNulty, US Department of Housing and Urban Development

III. Revisions, Clarifications, and Corrections to the Draft EIS

III. REVISIONS, CLARIFICATIONS, AND CORRECTIONS TO THE DRAFT EIS

This section of the Final EIS provides changes to the Draft EIS that have been made to revise, clarify, or correct the environmental analysis for the Rose Hill Courts Development Project (the Project). Changes in this section are a result of comments received in response to the Draft EIR/EIS. The changes detailed in this section do not result in the Project creating any new or increased significant environmental impacts.

This section contains the following sub-sections: Section III.A, General Corrections and Revisions to the Draft EIS; Section III.B, Corrections and Additions to Draft EIS Sections and Appendices; and Section III.C, Effect of Corrections and Revisions.

A. General Corrections and Revisions to the Draft EIS

1. Supplemental Air Emissions Modeling Data

In response to the comment letter on the Draft EIR submitted by the South Coast Air Quality Management District (SCAQMD), supplemental air emissions modeling has been conducted for both air quality and greenhouse gas emissions and is appended to the Final EIR document. Please note that the results of the supplemental air emissions modeling do not change the significance of the findings in the Draft EIS for the Proposed Action.

B. Corrections and Additions to Draft EIS Sections and Appendices

Changes have been made to the Draft EIS as a result of comments received in response to comments on and corrections and additions to the Draft EIR/EIS. Deletions are shown in ~~striketrough~~ text and additions are shown in underlined text. Changes are provided below and are organized by EIS section.

13.1 Summary

Make the following text changes to the second paragraph on page 13-7:

~~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.~~

The Project Applicant shall prepare an interpretive display and install it in the new community building on the redeveloped Rose Hill Courts property. The interpretive display shall be completed to coincide with the opening of the community building once construction of Phase II is complete. It shall include a brief history of the historic property, its significance in the contexts of public and defense worker housing in Los Angeles during the Second World War and public housing design

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

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.)

Please refer to Section III. of the FEIR (pages III-5 through III-11 of the FEIR) for more detail regarding specific revisions to the PA text.

13.4 Alternatives Including Proposed Action

Insert the following after the fourth sentence of the first paragraph of Section 13.4.1.8 on Page 13-34:

As stated in project design feature **AQ-PDF-1**, Construction contracts will have a requirement that the construction contractor may only use equipment permitted (where permits are required) by the SCAQMD 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.

Add the following text to the end of the second paragraph on page 13-35:

In September 2019, HUD issued a notice for combined RAD/PBV developments that permits in-place residents assisted by the PBV program to remain in units that are inappropriately sized if no right-sized units are available. However, as a matter of policy, right-sizing is preferred and doing so will not only create 85 new units for larger families but will permit the development of accessible units that will allow a substantial portion of the existing families who are elderly and disabled to age- in-place.

Add the following text below Table 13.4-2, Permits and Approvals, on page 13-36:

The City of Los Angeles may in the future initiate a General Plan amendment from Low Residential to Medium Residential and a zone change from [Q]R1-1D to [Q]R3-1D. While this General Plan amendment is not necessary for development of the Project, it would further the intent of State law initiatives to address the housing crises and represent current best planning practices.

The General Plan amendment and zone change would also be consistent with recently enacted Senate Bill 330, the Housing Crisis Act of 2019, which acknowledges that California has a housing supply and affordability crisis of historic proportions and implements measures to address this crisis. Among other things, the Act generally prohibits most down-zonings of residentially zoned land (California Government Code § 66300(b)). The Act also provides that any replacement housing development project on the site must have at least as many dwelling units as the greatest number of units that existed on the site within the last five years; given the existing 100-unit development on the site, the Medium Residential designation and [Q]R3-1 zoning would be more consistent with this requirement. The State legislature specifically intended that the Housing Crisis Act be broadly construed to maximize the development of housing (California Government Code § 66300(f)(2)). The potential General Plan amendment and zone change would therefore be more consistent with and would more fully support the policies of the Housing Crisis Act. In addition, with these proposed actions, the land use designation under Community Plan would reflect the physical development on the site consistent, with current best planning practices.

Make the following changes to the text in the second full paragraph on page 13-38 and the first paragraph on page 13-39:

When residents return to a renovated unit with Section 8 subsidy, they would need to be "right sized" to ~~the new~~ applicable occupancy standards and thus not all residents would be able to return to the same sized unit they currently reside in. Since only nine additional units would be added (for a total of 100) due to renovations, not all current residents may be able to immediately return to a permanent unit in Rose Hill Courts ~~due to the change in occupancy standards~~.

Make the following changes to the text in the Alternative 2 and 3: Relocation summary on Page 13-42:

When residents return to a renovated unit with Section 8 subsidy, they would need to be "right sized" to ~~the new~~ applicable occupancy standards meaning not all residents would be able to immediately return to a permanent unit in Rose Hill Courts right sized unit.

13.5 Affected Environment

On p. 13-81, in the paragraph headed by "Lead in Soil," insert the following immediately before the conclusory statement at the end of the paragraph:

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

Add the following text at the end of the first full paragraph at the top of page 13-83:

The site was originally zoned R4-1, but was rezoned as part of the Northeast Community Plan update in 2000. As this rezoning rendered the existing public housing project legally nonconforming, it does not reflect current best planning practices. While not needed for development of the Project, the City may in the future initiate a General Plan amendment from Low Residential to Medium Residential

and a zone change from [Q]R1-1D to [Q]R3-1D in furtherance of the State’s recent housing initiative and in conformance with current best planning practices.

The General Plan amendment and zone change would also be consistent with recently enacted Senate Bill 330, the Housing Crisis Act of 2019, which acknowledges that California has a housing supply and affordability crisis of historic proportions and implements measures to address this crisis. Among other things, the Act generally prohibits most residential down-zonings of residentially zoned land and expressly does not prohibit changes to development policies to allow greater density or facilitate the development of housing (see California Government Code § 66300(b)). The Act also provides that any replacement housing development project on the site must have at least as many dwelling units as the greatest number of units that existed on the site within the last five years; given the existing 100-unit development on the site, the Medium Residential designation and [Q]R3-1 zoning would be more consistent with this requirement. The State legislature specifically intended that the Housing Crisis Act be broadly construed to maximize the development of housing (California Government Code § 66300(f)(2)). The potential General Plan amendment and zone change would therefore be more consistent with and would more fully support the policies of the Housing Crisis Act. In addition, with these proposed actions, the land use designation under Community Plan would reflect the physical development on the site consistent, with current best planning practices.

13.6 Environmental Consequences

*On Page 13-121 of the DEIS (under Section 13.6.1.1, Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities, in the , in the “Determination and Compliance Documentation” column, to the right of Compliance Factor “Air Quality Effects of Ambient Air Quality on Project and Contribution to Community Pollution Levels”), add the following text before the text “See DEIR **Section 4.2, Air Quality**”:*

See DEIR **Section 4.2, Air Quality** and FEIR Section III. (pages III-4 to III-5 of the FEIR, Section 4.2 Air Quality).

*Under Section 13.6.1.1, Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities, p. 13-127, add the following sentence immediately before the final sentence of the paragraph titled “**Lead in Soil**”:*

HACLA will consult with the South Coast Air Quality Management District’s Engineering and Permitting staff to determine what permits, plans or additional compliance measures need to be incorporated in the SMP.

Under Section 13.6.1.1, Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities, on, p. 13-128, change the second bullet of mitigation measure HAZ-1 as follows:

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

*On page 13-149 of the DEIS, (under Section 13.6.2, Environmental impact statement Factors, in the Source or Determination column to the right of Topical Area “Air Quality Effects of Ambient Air Quality on Project and Contribution to Community Pollution Levels”), add the following text before the text “See DEIR **Section 4.2, Air Quality**”:*

In evaluating potential air quality impacts, it is necessary to take into account certain project design features that would reduce energy use. They include:

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.

On page 13-149 of the DEIS (after the text added above), change the last sentence to the following:

See DEIR **Section 4.2**, Air Quality and FEIR Section III. (pages III-4 to III-5 of the FEIR, Section 4.2 Air Quality).

On page 13-152 of the DEIS, add the following sentence at the end of the first paragraph:

In September 2019, HUD issued a notice for combined RAD/PBV developments that permits in-place residents assisted by the PBV program to remain in units that are inappropriately sized if no right-sized units are available. However, as a matter of policy, right-sizing is preferred and doing so will not only create 85 new units for larger families but will permit the development of accessible units that will allow a substantial portion of the existing families who are elderly and disabled to age-in-place.