
APPENDIX D

PUBLIC REVIEW PERIOD COMMENTS

APPENDIX D1
PUBLIC COMMENT TRACKING MATRIX

SUMMARY OF COMMENTS RECEIVED DURING THE PUBLIC REVIEW PERIOD

Comment No.	Date Received	Format Received	Commenter Name	Brief Summary of Comment Received	Where in the EIR/EIS the comment is addressed
1	8/20/2018	Mail	Anthony Manzano	This letter provides Mr. Manzano's input regarding the project. Mr. Manzano introduces himself in the letter and describes his understanding of the project.	Project Description
2	9/14/2018	Email	Andrew Salas, Chairman	The project lies within the tribe's ancestral tribal territory and is located within a sensitive area. The tribe would like to consult regarding the proposed project.	Tribal Cultural Resources Section
3	9/21/2018	Email	Tom Williams	Please provide project objectives and/or project purposes/needs for the Scoping comments RE: alternatives and mitigation.	Purposes/needs are in the Executive Summary section, scoping comments are in Appendix C , Alternatives are in section 2.0, and the MMRP contains the project mitigation.
4	9/24/2018	Voice Message	Daniel Charlier-Smith with Lozeau Drury LLP	Wants to know who the applicant is and could not find the NOP online.	Appendix to the EIR/EIS
5	9/27/2018	Voice Message	Alan Lin, Caltrans District 7	Has a couple of questions about the Rose Hill Courts Redevelopment project.	Appendix to the EIR/EIS
6	10/1/2018	Email	Daniel Charlier-Smith with Lozeau Drury LLP	When does the NOP comment period end? When do you anticipate the DEIR to be released?	Appendix to the EIR/EIS
7	10/1/2018	Email	Francisco Guerrero	Wanted to verify the General Contractor that will be performing the work for the project at Rose Hill Courts. Interested in bidding opportunities for the Carpenters craftwork.	Project Description and Appendix to the EIR/EIS
8	10/1/2018	Email	Gabrieleño Band of Mission Indians-Kitz Nation	Our Tribal Government would like to be consulted if any ground disturbance will be conducted for this project.	Tribal Cultural Resources Sections
9	10/2/2018	Mail	Scott Morgan, Director	Letter sent from State Clearinghouse to reviewing agencies.	Appendix to the EIR/EIS

SUMMARY OF COMMENTS RECEIVED DURING THE PUBLIC REVIEW PERIOD

Comment No.	Date Received	Format Received	Commenter Name	Brief Summary of Comment Received	Where in the EIR/EIS the comment is addressed
10	10/4/2018	Voice Message	Francisco Guerrero	Voice message states: "I would like a little bit more information if it is possible."	Appendix to the EIR/EIS
11	10/5/2018	Mail	Daniel Garcia, Program Supervisor at the South Coast Air Quality Management District	The letter includes SCAQMD staff's comments and recommendations regarding the analysis of potential air quality impacts from the proposed project.	Air Quality Section of the EIR/EIS
12	10/7/2018	Email	Christian Arenas	<ol style="list-style-type: none"> 1. Will this housing, only be made available to low income individuals? 2. Is there any follow up to make sure tenants are in good standing? 3. Will there be anyone making sure that tenants are not allowing more people live in the unit that is allowed? 4. Is there any security/police involved to make a safer housing? 5. Will there be ground rules or maintenance staff to keep the area clean? 6. I have concerns for the incoming tenants who will double in size, and what impact they will have in the surrounding neighborhood. 7. I'd like to be informed if you hold another meeting for nearby homeowners to hear any concerns from them. 	<ol style="list-style-type: none"> 1-5. Project Description of the EIR/EIS 6. Population and Housing section of EIR/EIS
13	10/8/2018	Email	Francisco Guerrero	Email sent with a thank you for the quick response and that he is looking forward to hearing back if further information come available.	Appendix to the EIR/EIS
14	10/15/2018	Email	Tom Williams	This comment expresses confusion regarding the end dates for the review period for the project, asks for an extension of the review period to October 29th, and requests the project goals/objectives/purpose and need.	Executive Summary and Introduction Sections of the EIR/EIS.
15	10/19/2018	Letter	Jean Prijatel	Several areas could result in significant impacts, including, but not limited to, air quality, lead and	Air Quality Section, Hazards and

SUMMARY OF COMMENTS RECEIVED DURING THE PUBLIC REVIEW PERIOD

Comment No.	Date Received	Format Received	Commenter Name	Brief Summary of Comment Received	Where in the EIR/EIS the comment is addressed
				asbestos, and energy use. When the draft EIS is prepared please send one hard copy and one CD to the address on the letter (mail code: ENF-4-2).	Hazardous Materials Section, and Energy Conservation Section of the EIR/EIS
16	10/22/2018	Email	Jorge Garcia, President of the El Sereno Historical Society	Both the CEQA and NEPA documents erroneously state that the Rose Hill Courts Redevelopment projects is either in the Rose Hill neighborhood or the Rose Hills neighborhood of Los Angeles. It needs to be clarified that the Rose Hill Courts Redevelopment project is located within the community of El Sereno.	Throughout the EIR/EIS, as applicable.
17	10/22/2018	Email	Tom Williams	This comment letter provides comments on a large variety of topics including: environmental justice, alternatives, geology/seismicity, MMRP, public services, purpose/need, goals/objectives, cultural and tribal cultural resources, historic resources, air quality, greenhouse gases, noise, hazards and hazardous materials, public services, recreation, transportation and traffic, recreation, utilities and service systems, hydrology/drainage, water quality, groundwater, ADA compliance, and references.	Throughout the EIR/EIS, in the respective sections of the document.
18	10/22/2018	Email	Kelly Tsou	We received the attached filed Rose Hill Courts EIR document in the mail today. I have placed the hard copy in the Rose Hills Courts folder along with the other comments to EIR.	Appendix to the EIR/EIS.
Comments Received After the Close of the Public Comment Period					
19	11/12/2018	Email	Tom Williams	Could I please receive any digital copies of the presentation materials shown during the 121/07/18 public meeting? Are you still interested in receiving any further comments?	Executive Summary Section

APPENDIX D2
PUBLIC COMMENTS

August 20, 2018

Submitted for Rose Hill Courts New Construction

This document is prepared for the purposes of providing input for the public comment period of the new construction of Rose Hill Courts. My name is Anthony Manzano, a resident in Rose Hills and community leader, involved in nearly all aspects and components in the progress, safety, and civic advancements for our area of Los Angeles. Over the years I have established a working interaction with our Council Member, City Departments, residents, and businesses, to improve where we live.

I have recently been active in providing input to the Housing Authority of the City of Los Angeles, regarding the services needed at the Rose Hill Courts, and this is my opportunity to see this project move forward. As part of the public comment period, a historic review is being considered as required for this site. It is my understanding that the study area is exclusive to the property owned by the City and designated as housing for low income families. This study area is complete and held within the property of HACLA. Although the construction of the initial site was built in 1942, it has outlived its usefulness in serving as adequate housing for the residents living in the Courts.

I have studied our community history for well over a decade, and I understand this site is eligible as historic at the Federal level, but as the community representative, we have a greater interest in serving the tenants, then in preserving the buildings. I personally do not believe the architecture, layout, or site location meets the qualifications of being labeled 'historic'. I have seen other City Housing units that have been on the same list as eligible, demolished and rebuilt to better serve the tenants, and I feel this project meets the same criteria (demolished and New Construction).

This document is my personal input, and I also want to express that I serve as the President of LA-32 Neighborhood Council, and we welcome to have HACLA come speak to our Board for further outreach, the Board meets on the first Wednesday of each month. If there is an opportunity to provide additional input at a future date, we would like to have that considered. I would also like to be informed of any upcoming meetings or hearings relating to the Rose Hills Courts, as I have played a vital role in asking the Housing Authority to consider this new construction option, as it is a benefit for the tenants, Neighbors, and community at large.

Thank You for allowing me to continue to be of service to those impacted by this project, and for the future advancements of the entire community as a whole.

Rose Hills Review,

Anthony Manzano

From: Administration Gabrieleno Indians [mailto:admin@gabrielenoindians.org]
Sent: Friday, September 14, 2018 1:10 PM
To: RHCRdev CEQA <RHCRdev.CEQA@hacla.org>
Subject: Rose Hill Court Redevelopment Project, Los Angeles County, California

Please see attachment

Sincerely,
Admin Specialist
Gabrieleno Band of Mission Indians - Kizh Nation
PO Box 393
Covina, CA 91723
Office: 844-390-0787
website: www.gabrielenoindians.org

This electronic mail (including any attachments) may contain information that is privileged, confidential, and/or otherwise protected from disclosure to anyone other than its intended recipient(s). Any dissemination or use of this electronic mail or its contents (including any attachments) by persons other than the intended recipient(s) is strictly prohibited. If you have received this message in error, please notify us immediately by reply e-mail so that we may correct our internal records. Please then delete the original message (including any attachments) in its entirety. Thank you.



GABRIELEÑO BAND OF MISSION INDIANS - KIZH NATION

Historically known as The San Gabriel Band of Mission Indians / Gabrielino Tribal Council
recognized by the State of California as the aboriginal tribe of the Los Angeles basin

City of Los Angeles
1600 Wilshire Boulevard, 4th Floor
Los Angeles, CA 90057

September 14, 2018

Re: AB52 Consultation request for Rose Hill Court Redevelopment Project, Los Angeles County, California

Dear Jenny Scanlin,

Please find this letter as a written request for consultation regarding the above-mentioned project pursuant to Public Resources Code § 21080.3.1, subd. (d). Your project lies within our ancestral tribal territory, meaning belonging to or inherited from, which is a higher degree of kinship than traditional or cultural affiliation. Your project is located within a sensitive area and may cause a substantial adverse change in the significance of our tribal cultural resources. Most often, a records search for our tribal cultural resources will result in a "no records found" for the project area. The Native American Heritage Commission (NAHC), ethnographers, historians, and professional archaeologists can only provide limited information that has been previously documented about California Native Tribes. For this reason, the NAHC will always refer the lead agency to the respective Native American Tribe of the area. The NAHC is only aware of general information and are not the experts on each California Tribe. Our Elder Committee & tribal historians are the experts for our Tribe and can provide a more complete history (both written and oral) regarding the location of historic villages, trade routes, cemeteries and sacred/religious sites in the project area.

Additionally, CEQA now defines Tribal Cultural Resources (TCRs) as their own independent element separate from archaeological resources. Environmental documents shall now address a separate Tribal Cultural Resource section which includes a thorough analysis of the impacts to only Tribal Cultural Resources (TCRs) and includes independent mitigation measures created with Tribal input during AB-52 consultations. As a result, all mitigation measures, conditions of approval and agreements regarding TCRs (i.e. prehistoric resources) shall be handled solely with the Tribal Government and not through an Environmental/Archaeological firm.

In effort to avoid adverse effects to our tribal cultural resources, we would like to consult with you and your staff to provide you with a more complete understanding of the prehistoric use(s) of the project area and the potential risks for causing a substantial adverse change to the significance of our tribal cultural resources.

Consultation appointments are available on Wednesdays and Thursdays at our offices at 910 N. Citrus Ave. Covina, CA 91722 or over the phone. Please call toll free 1-844-390-0787 or email admin@gabrielenoindians.org to schedule an appointment.

*** Prior to the first consultation with our Tribe, we ask all those individuals participating in the consultation to view a video produced and provided by CalEPA and the NAHC for sensitivity and understanding of AB52. You can view their videos at: <http://calepa.ca.gov/Tribal/Training/> or <http://nahc.ca.gov/2015/12/ab-52-tribal-training/>*

With Respect,

Andrew Salas, Chairman

Andrew Salas, Chairman

Albert Perez, treasurer |

PO Box 393, Covina, CA 91723

Nadine Salas, Vice-Chairman

Martha Gonzalez Lemos, treasurer ||

www.gabrielenoindians.org

Christina Swindall Martinez, secretary

Richard Gradias, Chairman of the Council of Elders

gabrielenoindians@yahoo.com

Original People of Los Angeles County



Map of territories of Original Peoples with county boundaries in Southern California.

From: Tom Williams [<mailto:ctwilliams2012@yahoo.com>]

Sent: Friday, September 21, 2018 10:08 PM

To: robert.manford@lacity.org; RHCRedev CEQA <RHCRedev.CEQA@hacla.org>; dhiraj.narayan@lacity.org

Subject: Docket No. FR—6126-N-01 Requests - Provide Project Objectives, Purposes, and Needs

Docket No. FR—6126-N-01 Notice of Intent to Prepare a Draft Environmental Impact Statement for the Rose Hill Courts Redevelopment

DEPARTMENT OF HOUSING AND DEVELOPMENT

FOR FURTHER INFORMATION CONTACT: Dr. Robert Manford, Environmental Affairs Officer, Planning and Land Use, Finance & Development Division of the City of Los Angeles Housing, Community Investment Department, 1200 West 7th Street, 8th Floor, Los Angeles, CA 90017. Comments and questions can also be directed to robert.manford@lacity.org, Fax: (213) 808-8914, (NEPA) and Dhiraj Narayan, Development Officer, Development Services, HACLA, RHCRedev.CEQA@hacla.org, telephone number 213-252-6120, fax number 213- 252-2739 (CEQA).

Please provide project objectives and/or project purposes/needs for the Scoping comments RE: alternatives and mitigation.

Dr Tom Williams Snr Techn. Adviser, Citizens Coalitions for A Safe Community

323-528-9682 4117 Barrett Rd. LA 90032-1712

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From: Development Services <Development.Services@la-mm-mss.haclapriv>

Sent: Monday, September 24, 2018 9:37 AM

Subject: FW: Voice Mail Message (33 seconds)

FYI, a question from a law firm in Oakland on the applicant. Not sure why he could not locate the NOP on our website. I just checked and is available.

From: 5108364200 [mailto:non-mail-user@la-mm-mss.haclapriv]

Sent: Friday, September 21, 2018 12:54 PM

To: Development Services <Development.Services@la-mm-mss.haclapriv>

Subject: Voice Mail Message (33 seconds)

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From: 2138978391 [<mailto:non-mail-user@la-mm-mss.haclapriv>]
Sent: Thursday, September 27, 2018 3:19 PM
To: Development Services <Development.Services@la-mm-mss.haclapriv>
Subject: Voice Mail Message (27 seconds)

Voice mail from CALTRANS.

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From: Daniel Charlier-Smith <daniel@lozeaudrury.com>
Sent: Monday, October 01, 2018 10:44 AM
To: mpartridge@ultrasystems.com
Subject: Re: Response to voice message left re: Rose Hill Courts project

Good Morning Margaret, thank you for your response, When does the NOP comment period ends?
When do you anticipate the DEIR to be released ? thank you

Daniel

On Mon, Oct 1, 2018 at 10:35 AM Margaret Partridge <mpartridge@ultrasystems.com> wrote:

Hello Daniel,

This email is to follow up on the voice message you left regarding the Rose Hill Courts Project.

You may find copies of the Initial Study and Environmental Assessment, including the NOP on HACLA's website.

<http://www.hacla.org/dsprojects/ID/8/Rose-Hill-Courts>

Please scroll down when you on this page and these documents are listed under the sub-title: ROSE HILLS COURTS ENVIRONMENTAL REVIEW DOCUMENTS, click on "CEQA" and underneath that, you will find links to the NOP.

If you have additional questions, please let me know.

Thank you.

-Margaret

Margaret Partridge, AICP, LEED Green Associate, ENV SP | Senior Project Manager

UltraSystems Environmental | WBE/DBE/SBE/WOSB
16431 Scientific Way | Irvine, CA 92618
Office: 949/788.4900 Ext. 229 | Fax: 949/788-4901

Website: www.ultrasystems.com

E-mail: mpartridge@ultrasystems.com

Please consider the environment before printing this e-mail. Thank you.

--

Daniel Charlier-Smith

Paralegal

Lozeau | Drury LLP

410 12th Street, Suite 250

Oakland, California 94607

(510) 836-4200

(510) 836-4205 (fax)

Daniel@lozeaudrury.com

From: Robert Manford [<mailto:robert.manford@lacity.org>]
Sent: Monday, October 01, 2018 10:52 AM
To: Margaret Partridge <mpartridge@ultrasystems.com>; Betsy A. Lindsay <blindsay@ultrasystems.com>; Dhiraj Narayan <Dhiraj.Narayan@hacla.org>
Cc: Shelly Lo <shelly.lo@lacity.org>
Subject: Fwd: General Contractor information

FYI

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Dr. Robert K. Manford Environmental Affairs Officer &
Manager, Planning and Land Use Unit
Finance & Development Division
Housing + Community Investment Department (HCID)
1200 W. 7th Street 8th Floor
Los Angeles, CA 90017
☎:(213) 922-9666 | ✉: robert.manford@lacity.org

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----- Forwarded message -----

From: Francisco Guerrero <fguerrero@swcarpenters.org>
Date: Mon, Oct 1, 2018 at 10:48 AM
Subject: General Contractor information
To: "robert.manford@lacity.org" <robert.manford@lacity.org>
Cc: Manny Salcido <MSalcido@swcarpenters.org>

Hello, my name is Francisco Guerrero I'm a Representative for the Southwest Regional Council of Carpenters and I would like to verify the General Contractor that will be performing the work for the project at Rose Hill Courts 4446 Florizel Street, Los Angeles, CA 90032. I am also interested in bidding opportunities for the Carpenters craftwork. Thank you in advance.

Francisco Guerrero
Special Representative
Southwest Regional Council of
Carpenters

Cell: (213) 317-1561

Office: (213) 385-3510

533 S. FREMONT AVE #501

LOS ANGELES, CA 90071

From: Administration Gabrieleno Indians [mailto:admin@gabrielenoindians.org]
Sent: Friday, September 28, 2018 11:17 AM
To: RHCRdev CEQA <RHCRdev.CEQA@hacla.org>

Subject: Rose Hills Courts Redevelopment

Please see attachment

Sincerely, Admin Specialist Gabrieleno Band of Mission Indians - Kizh Nation
PO Box 393 Covina, CA 91723
Office: 844-390-0787
website: www.gabrielenoindians.org

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GABRIELENO BAND OF MISSION INDIANS - KIZH NATION
Historically known as The San Gabriel Band of Mission Indians
recognized by the State of California as the aboriginal tribe of the Los Angeles basin

Notice of Intent to Adopt An Initial Study/ Mitigated Negative Declaration

September 28, 2018

Dhiraj Narayan, Development Officer
Housing Authority of the City of Los Angeles
City of Los Angeles
2600 Wilshire Boulevard, Los Angeles, CA 90057

Good morning,

We have received your Notice of Intent to adopt a Negative Declaration for this project the Rose Hills Courts Redevelopment in the location of Los Angeles. Our Tribal Government would like to be consulted if any ground disturbance will be conducted for this project. Your site location 4446 Florizel Street, Los Angeles, CA 90032 is within 1.01 miles radius of nearby villages and trading routes and because of these major factors the Tribal government is highly concerned about the high probability of impacting cultural resources and ancestral remains.

Sincerely Lexie
Gabrieleno Band of Mission Indians/Kizh Nation
(1844) 390-0787 Office

Andrew Salas, Chairman
Albert Perez, treasurer I

Nadine Salas, Vice-Chairman
Martha Gonzalez Lemos, treasurer II

Dr. Christina Swindall Martinez, secretary
Richard Gradias, Chairman of the council of Elders

PO Box 393 Covina, CA 91723

www.gabrielenoindians@yahoo.com

gabrielenoindians@yahoo.com



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH



KEN ALEX
DIRECTOR

Notice of Preparation

September 18, 2018

To: Reviewing Agencies

Re: Rose Hill Courts Redevelopment
SCH# 2018091035

Attached for your review and comment is the Notice of Preparation (NOP) for the Rose Hill Courts Redevelopment draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Dhiraj Narayan
Housing Authority of the City of Los Angeles
2600 Wilshire Blvd, 4th floor
Los Angeles, CA 90057

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
1-916-322-2318 FAX 1-916-558-3184 www.opr.ca.gov



**Document Details Report
State Clearinghouse Data Base**

SCH# 2018091035
Project Title Rose Hill Courts Redevelopment
Lead Agency Los Angeles, City of

Type **NOP** Notice of Preparation
Description Note: Review Per Lead

The project will consist of the demolition of 100 existing units and 1 administration building and the construction of 191 affordable housing units to be developed in two phases. Proposed improvements include the following: 191 affordable housing units, 176 parking spaces, property management and maintenance office and new landscaping.

Lead Agency Contact

Name Dhiraj Narayan
Agency Housing Authority of the City of Los Angeles
Phone (213) 252-6120 **Fax**
email
Address 2600 Wilshire Blvd, 4th floor
City Los Angeles **State** CA **Zip** 90057

Project Location

County Los Angeles
City
Region
Cross Streets 4446 Florizel St; Mckenzie Ave and Mercury Ave
Lat / Long 34° 05' 11.6" N / 118° 11' 29.6" W
Parcel No. 5305-011-900
Township 1S **Range** 13W **Section** 13NE1/ **Base** SB

Proximity to:

Highways I-10, I-5
Airports
Railways Metrolink
Waterways
Schools various
Land Use LU: Low res; Z: [Q]R1-1D

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Cumulative Effects; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Growth Inducing; Landuse; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian

Reviewing Agencies Resources Agency; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Wildlife, Region 5; Native American Heritage Commission; Department of Housing and Community Development; Public Utilities Commission; California Highway Patrol; Caltrans, District 7; Regional Water Quality Control Board, Region 4; State Water Resources Control Board, Division of Drinking Water; Baldwin Hills Conservancy

Date Received 09/18/2018 **Start of Review** 09/18/2018 **End of Review** 10/22/2018

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH # 2018091035

Project Title: Rose Hill Courts Redevelopment

Lead Agency: Housing Authority of the City of Los Angeles Contact Person: Dhiraj Narayan
Mailing Address: 2600 Wilshire Boulevard, 4th Floor Phone: (213) 252-6120
City: Los Angeles Zip: 90057 County: Los Angeles

Project Location: County: Los Angeles City/Nearest Community: Rose Hills
Cross Streets: Project Address: 4446 Florizel St. (cross streets: Mckenzie Avenue and Mercury Avenue) Zip Code: 90032
Longitude/Latitude (degrees, minutes and seconds): 34 05 ' 11.6 " N / 118 01 ' 29.6 " W Total Acres: 5.24
Assessor's Parcel No.: 5305-011-900 Section: 13NE14 Twp.: 1S Range: 13W Base: SanBernd
Within 2 Miles: State Hwy #: I-10 and I-5 Waterways: none
Airports: None Railways: Metrolink Schools: See Attachment A

Document Type:

CEQA: [X] NOP [] Draft EIR NEPA: [X] NOI Other: [X] Joint Document
[] Early Cons [] Supplement/Subsequent EIR [] EA [] Final Document
[] Neg Dec (Prior SCH No.) [] Draft EIS [] Other:
[] Mit Neg Dec Other:

Local Action Type:

[] General Plan Update [] Specific Plan [] Rezone [] Annexation
[] General Plan Amendment [] Master Plan [] Prezone SEP 18 2018 [] Redevelopment
[] General Plan Element [] Planned Unit Development [] Use Permit [] Coastal Permit
[] Community Plan [] Site Plan [] Other: Lot Tie/LLA

Development Type:

[X] Residential: Units 191 Acres 5.24
[] Office: Sq.ft. Acres Employees
[] Commercial: Sq.ft. Acres Employees
[] Industrial: Sq.ft. Acres Employees
[] Educational:
[] Recreational:
[] Water Facilities: Type MGD
[] Transportation: Type
[] Mining: Mineral
[] Power: Type MW
[] Waste Treatment: Type MGD
[] Hazardous Waste: Type
[] Other:

Project Issues Discussed in Document:

[X] Aesthetic/Visual [] Fiscal [X] Recreation/Parks [X] Vegetation
[X] Agricultural Land [X] Flood Plain/Flooding [X] Schools/Universities [X] Water Quality
[X] Air Quality [X] Forest Land/Fire Hazard [X] Septic Systems [X] Water Supply/Groundwater
[X] Archeological/Historical [X] Geologic/Seismic [X] Sewer Capacity [X] Wetland/Riparian
[X] Biological Resources [X] Minerals [X] Soil Erosion/Compaction/Grading [X] Growth Inducement
[] Coastal Zone [X] Noise [X] Solid Waste [X] Land Use
[X] Drainage/Absorption [X] Population/Housing Balance [X] Toxic/Hazardous [X] Cumulative Effects
[] Economic/Jobs [X] Public Services/Facilities [X] Traffic/Circulation [] Other:

Present Land Use/Zoning/General Plan Designation:

Land Use: Low Residential (LR) Zoning: [Q]R1-1D

Project Description: (please use a separate page if necessary)

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

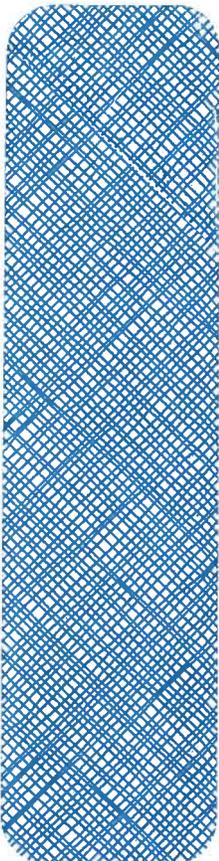
Proposed improvements include the following:

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

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

<input type="checkbox"/> Resources Agency Nadell Gayou	<input type="checkbox"/> Fish & Wildlife Region 4 Julie Vance	<input type="checkbox"/> Native American Heritage Comm. Debbie Treadway	<input type="checkbox"/> Caltrans, District 9 Gayle Rosander	<input type="checkbox"/> Regional Water Quality Control Board (RWQCB)
<input type="checkbox"/> Dept. of Boating & Waterways Denise Peterson	<input checked="" type="checkbox"/> Fish & Wildlife Region 5 Leslie Newton-Reed Habitat Conservation Program	<input checked="" type="checkbox"/> Public Utilities Commission Supervisor	<input type="checkbox"/> Caltrans, District 10 Tom Dumas	<input type="checkbox"/> RWQCB 1 Cathleen Hudson North Coast Region (1)
<input type="checkbox"/> California Coastal Commission Allyson Hitt	<input type="checkbox"/> Fish & Wildlife Region 6 Tiffany Ellis Habitat Conservation Program	<input type="checkbox"/> Santa Monica Bay Restoration Guangyu Wang	<input type="checkbox"/> Caltrans, District 11 Jacob Armstrong	<input type="checkbox"/> RWQCB 2 Environmental Document Coordinator San Francisco Bay Region (2)
<input type="checkbox"/> Colorado River Board Elsa Contreras	<input type="checkbox"/> Fish & Wildlife Region 6 I/M Heidi Calvert Inyo/Mono, Habitat Conservation Program	<input type="checkbox"/> State Lands Commission Jennifer Deleong	<input type="checkbox"/> Caltrans, District 12 Maureen El Harake	<input type="checkbox"/> RWQCB 3 Central Coast Region (3)
<input type="checkbox"/> Dept. of Conservation Crina Chan	<input type="checkbox"/> Dept. of Fish & Wildlife M William Paznokas Marine Region	<input type="checkbox"/> Tahoe Regional Planning Agency (TRPA) Cherry Jacques	<input type="checkbox"/> Air Resources Board	<input checked="" type="checkbox"/> RWQCB 4 Teresa Rodgers Los Angeles Region (4)
<input type="checkbox"/> Cal Fire Dan Foster	<input type="checkbox"/> Other Departments	<input type="checkbox"/> Cal State Transportation Agency CalSTA	<input type="checkbox"/> Airport & Freight Jack Wursten	<input type="checkbox"/> RWQCB 5 Central Valley Region (5)
<input type="checkbox"/> Central Valley Flood Protection Board James Herota	<input type="checkbox"/> California Department of Education Lesley Taylor	<input type="checkbox"/> Caltrans - Division of Aeronautics Philip Crimmins	<input type="checkbox"/> Transportation Projects Nesamani Kalandiyur	<input type="checkbox"/> RWQCB 5F Central Valley Region (5) Fresno Branch Office
<input checked="" type="checkbox"/> Office of Historic Preservation Ron Parsons	<input type="checkbox"/> OES (Office of Emergency Services) Monique Wilber	<input type="checkbox"/> Caltrans - Planning HQ LD-IGR Christian Bushong	<input type="checkbox"/> California Department of Resources, Recycling & Recovery Kevin Taylor/Jeff Esquivel	<input type="checkbox"/> RWQCB 5R Central Valley Region (5) Redding Branch Office
<input type="checkbox"/> Dept of Parks & Recreation Environmental Stewardship Section	<input type="checkbox"/> Food & Agriculture Sandra Schubert Dept. of Food and Agriculture	<input checked="" type="checkbox"/> California Highway Patrol Suzann Ikeuchi Office of Special Projects	<input type="checkbox"/> State Water Resources Control Board Regional Programs Unit Division of Financial Assistance	<input type="checkbox"/> RWQCB 6 Lahontan Region (6)
<input type="checkbox"/> S.F. Bay Conservation & Dev't. Comm. Steve Goldbeck	<input type="checkbox"/> Dept. of General Services Cathy Buck Environmental Services Section	<input type="checkbox"/> Dept. of Transportation	<input type="checkbox"/> State Water Resources Control Board Cindy Forbes - Asst Deputy Division of Drinking Water	<input type="checkbox"/> RWQCB 6V Lahontan Region (6) Victorville Branch Office
<input checked="" type="checkbox"/> Dept. of Water Resources Agency Nadell Gayou	<input type="checkbox"/> Housing & Comm. Dev. CEQA Coordinator Housing Policy Division	<input type="checkbox"/> Caltrans, District 1 Rex Jackman	<input type="checkbox"/> State Water Resources Control Board Div. Drinking Water # _____	<input type="checkbox"/> RWQCB 7 Colorado River Basin Region (7)
<input type="checkbox"/> Fish and Game	<input checked="" type="checkbox"/> Independent Commissions, Boards	<input type="checkbox"/> Caltrans, District 2 Marcelino Gonzalez	<input type="checkbox"/> State Water Resources Control Board Student Intern, 401 Water Quality Certification Unit Division of Water Quality	<input type="checkbox"/> RWQCB 8 Santa Ana Region (8)
<input type="checkbox"/> Dept. of Fish & Wildlife Scott Flint Environmental Services Division	<input type="checkbox"/> Delta Protection Commission Erik Vink	<input type="checkbox"/> Caltrans, District 3 Susan Zanchi	<input type="checkbox"/> State Water Resources Control Board Phil Crader Division of Water Rights	<input type="checkbox"/> RWQCB 9 San Diego Region (9)
<input type="checkbox"/> Fish & Wildlife Region 1 Curt Babcock	<input type="checkbox"/> Delta Stewardship Council Anthony Navasero	<input type="checkbox"/> Caltrans, District 4 Patricia Maurice	<input type="checkbox"/> Dept. of Toxic Substances Control Reg. # _____ CEQA Tracking Center	<input type="checkbox"/> Other _____
<input checked="" type="checkbox"/> Fish & Wildlife Region 1E Laurie Harnsberger	<input type="checkbox"/> California Energy Commission Eric Knight	<input type="checkbox"/> Caltrans, District 5 Larry Newland	<input type="checkbox"/> Department of Pesticide Regulation CEQA Coordinator	<input checked="" type="checkbox"/> <u>Redwin Hink</u> Conservancy
<input checked="" type="checkbox"/> Fish & Wildlife Region 2 Jeff Drongesen		<input type="checkbox"/> Caltrans, District 6 Michael Navarro		
<input type="checkbox"/> Fish & Wildlife Region 3 Craig Weightman		<input type="checkbox"/> Caltrans, District 7 Dianna Watson		
		<input type="checkbox"/> Caltrans, District 8 Mark Roberts		

State of California
Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
1400 Tenth Street
Sacramento, California 95812-3044



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Asset Management Dept.
Asset Development Dept.

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From: 2133171561 [mailto:non-mail-user@la-mm-mss.haclapriv]

Sent: Thursday, October 04, 2018 3:02 PM

To: Development Services <Development.Services@la-mm-mss.haclapriv>

Subject: Voice Mail Message (14 seconds)

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From: Alina Mullins [mailto:AMullins@aqmd.gov]
Sent: Friday, October 05, 2018 8:23 AM
To: RHCRdev CEQA <RHCRdev.CEQA@hacla.org>
Cc: Daniel Garcia <dgarcia@aqmd.gov>
Subject: SCAQMD Staff NOP Comments for Rose Hill Courts Redevelopment

Dear Mr. Narayan,

Attached are SCAQMD staff comments on the Notice of Preparation of a Draft Environmental Impact Report for Rose Hill Courts Redevelopment (SCAQMD Control Number: LAC180926-03). The original, electronically signed letter will be forwarded to your attention by regular USPS mail. Please contact me if you have any questions regarding these comments.

Kind regards,

Alina Mullins
Assistant Air Quality Specialist, CEQA IGR
Planning, Rule Development & Area Sources
South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765
P. (909) 396-2402
E. amullins@aqmd.gov

*Please note that the SCAQMD is closed on Mondays.



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA USPS AND E-MAIL:

October 5, 2018

RHCRedev.ceqa@hacla.org

Dhiraj Narayan, Development Office

Housing Authority of the City of Los Angeles

2600 Wilshire Boulevard

Los Angeles, CA 90057

Notice of Preparation of a Draft Environmental Impact Report for the Rose Hill Courts Redevelopment

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the Proposed Project that should be included in the draft Environmental Impact Report (EIR). Please send SCAQMD a copy of the draft EIR upon its completion. Note that copies of the draft EIR that are submitted to the State Clearinghouse are not forwarded to SCAQMD. Please forward a copy of the draft EIR directly to SCAQMD at the address shown in the letterhead. **In addition, please send with the draft EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files¹. These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, SCAQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from SCAQMD's Subscription Services Department by calling (909) 396-3720. More guidance developed since this Handbook is also available on SCAQMD's website at: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). SCAQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

SCAQMD has also developed both regional and localized significance thresholds. SCAQMD staff requests that the Lead Agency quantify criteria pollutant emissions and compare the results to SCAQMD's CEQA regional pollutant emissions significance thresholds to determine air quality impacts.

¹ Pursuant to the CEQA Guidelines Section 15174, the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.

SCAQMD's CEQA regional pollutant emissions significance thresholds can be found here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>. In addition to analyzing regional air quality impacts, SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the Proposed Project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by SCAQMD staff or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis.

In the event that the Proposed Project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Guidance² on strategies to reduce air pollution exposure near high-volume roadways can be found at: https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF.

Mitigation Measures

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize these impacts. Pursuant to CEQA Guidelines Section 15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are

² In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's Air Quality and Land Use Handbook: A Community Health Perspective. This technical advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. The technical advisory is available at: <https://www.arb.ca.gov/ch/landuse.htm>.

available to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project, including:

- Chapter 11 “Mitigating the Impact of a Project” of the SCAQMD *CEQA Air Quality Handbook*. SCAQMD’s CEQA web pages available here: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>
- SCAQMD’s Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- SCAQMD’s Mitigation Monitoring and Reporting Plan (MMRP) for the 2016 Air Quality Management Plan (2016 AQMP) available here (starting on page 86): <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf>
- CAPCOA’s *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

Alternatives

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires the consideration and discussion of alternatives to the project or its location which are capable of avoiding or substantially lessening any of the significant effects of the project. The discussion of a reasonable range of potentially feasible alternatives, including a “no project” alternative, is intended to foster informed decision-making and public participation. Pursuant to CEQA Guidelines Section 15126.6(d), the draft EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project.

Permits and SCAQMD Rules

In the event that the Proposed Project requires a permit from SCAQMD, SCAQMD should be identified as a responsible agency for the Proposed Project. For more information on permits, please visit SCAQMD webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to SCAQMD’s Engineering and Permitting staff at (909) 396-3385. The final CEQA document should also discuss compliance with SCAQMD Rules, including, but not limited to, Rule 403 – Fugitive Dust and 403(e) Additional Requirements for Large Operations.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling SCAQMD’s Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available at SCAQMD’s webpage at: <http://www.aqmd.gov>.

The SCAQMD staff is available to work with the Lead Agency to ensure that project air quality and health risk impacts are accurately evaluated and mitigated where feasible. Please contact Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

Sincerely,

Daniel Garcia

Daniel Garcia

Program Supervisor

Planning, Rule Development & Area Sources

DG/AM
LAC180926-03
Control Number

From: Christian Arenas [mailto:christian.r.arenas@gmail.com]
Sent: Sunday, October 07, 2018 10:23 AM
To: RHCRdev CEQA <RHCRdev.CEQA@hacla.org>
Subject: Rose Hills Courts- Nearby Homeowner Questions

Hello,

I attended the recent meeting at the Rose Hills Courts on Oct 4th. I live around the block from them, and I had some questions for the developers.

Will this housing, only be made available to low income individuals? I read on your site the requirements to be considered, but is there any follow up to make sure tenants are in good standing? Currently the Rose Hills Courts is made of of what seems like older people and some small kids, but people who have lived here for years, told me that they were filled with gang members. As you double up the number of units, and tenants kids grow up from kids to teens, I have concerns that the gang members will be back double the size.

Will there be anyone making sure that tenants are not allowing more people live in the unit that is allowed? Is there any security/police involved to make a safer housing?

Will there be ground rules or maintenance staff to keep the area clean/ Right now there's trash left on the public side walks surrounding the courts, laundry is hung out in plain site, some units have built make shift patios which look like homeless encampments.

I agree they need to be rebuilt, they are so rundown. I have concerns for the incoming tenants who will double in size, and what impact they will have in the surrounding neighborhood. It's the gang issue that is most concerning to me, and it seems to have been controlled here, because of the large age gap of current residents, very old or very young.

I hope you have take all of this inconsideration. I'd like to be informed if you hold another meeting for nearby homeowners to hear any concerns from them. For now it's been mixed meetings, and I know there is one planned for just the residents of Rose Hills, so I am hoping we get the same opportunity

Thank You

Christian Arenas

From: Francisco Guerrero [mailto:fguerrero@swcarpenters.org]
Sent: Monday, October 08, 2018 9:53 AM
To: Betsy Lindsay <blindsay@ultrasystems.com>
Subject: Re: General Contractor information - ANSWER

Thanks for the quick response and looking forward to hearing from you if further information comes available.

Francisco Guerrero
Special Representative
Southwest Regional Council of
Carpenters
Cell: (213) 317-1561
Office: (213) 385-3510
533 S. FREMONT AVE #501
LOS ANGELES, CA 90071

From: Tom Williams <ctwilliams2012@yahoo.com>

Date: Mon, Oct 15, 2018 at 12:16 PM

Subject: Closing Dates for CEQA/NEPA Scoping Comments #1 Sat.Oct. 20 or Mon.Oct. 22...Request for Extension to Fri. 10/29/2018

To: "robert.manford@lacity.org" <robert.manford@lacity.org>, "dhiraj.narayan@lacity.org" <dhiraj.narayan@lacity.org>, "RHCRdev.CEQA@hacla.org" <RHCRdev.CEQA@hacla.org>

Cc: Julio Torres <julio.torres@lacity.org>, ANTHONY MANZANO <rosehillsreview@yahoo.com>, Barbara Hensleigh <barbarajhensleigh@gmail.com>

Confusion exists for the Rose Hill Courts Scoping Comments due date: CEQA consideration indicate a due date of Monday Oct.22, 2018 while the NEPA considerations and the only HCILA website searched reference goes to the NEPA page and the following:

ADDRESSES: Comments relating to the scope of the EIR/EIS are requested and will be accepted by the contact persons listed below until October 20, 2018....

FOR FURTHER INFORMATION CONTACT: Dr. Robert Manford, Environmental Affairs Officer, Planning and Land Use, Finance & Development Division of the City of Los Angeles Housing, Community Investment Department, [1200 West 7th Street, 8th Floor, Los Angeles, CA 90017](#). Comments and questions can also be directed to robert.manford@lacity.org,... and Dhiraj Narayan, Development Officer, Development Services, HACLA, RHCRdev.CEQA@hacla.org, telephone number 213-252-6120, fax number 213- 252-2739 (CEQA).

Comments:

Due to the confusion due to the inadequate and incomplete NOP/IS/EA etc. **Please clarify and Provide notice to all appropriate webpages and emails** the due date for Comments (other than Saturday 10/20, as no one will be in the office) . see blow

Please extend the comment period to October 29, 2018 Initial review of the materials available CEQA/NEPA shows a total lack of background for Scoping in that No PROJECT GOALS/OBJECTIVES Nor PURPOSES/NEEDS are provided although an "Overview of Project Objectives" is mentioned. Without such, mitigative alternative cannot be developed. Objectives must be quantifiable/numerically based for quantitative comparisons in the DEIR/DEIS.

Please provide prior to closure of Scoping and within the DEIR/DEIS:

#1.1 "PROJECT GOALS/OBJECTIVES" and "PURPOSES/NEEDS" with numerical/quantifiable scales for the development of Alternative, a function of Scoping;

#1.2 Historic aerial photos of the Project site and vicinity - 1923, 1928, 1933, 1938 before current structures were constructed. 1923 aerials are on the corridor wall next to 525A in City Hall....current sources are EDR in Connecticut...check with LA DCP;

#1.3 All ownerships, special assessment districts, and specific plans within 500ft of Project perimeter;

#1.4 Sector Setting/Assessment/Mitigation for Hydrology and Water Quality in the DEIR/DEIS as the Low Impact Development will be significant for this project and would require collection, detention, and reuse/recharge within the Project or vicinity;

#1.5 Infrastructure - Utilities/Services - water supply and fire water, Street Services - gutters, drainage, and storm drains, and Sewerage - current capacities and flows, Street Lighting and all needed extensions for Project and within 500ft uphill of the Project perimeters ;

#1.6 Transportation routes, stops, amenities, frequency, and authorities for all public/accessible transit systems within 1320ft of the Project perimeter: ACCESS, DASH, MTA 78, 79, 79A, 252, 256, and 378;

#1.7 Draft Mit.Montr.Rptg.Plan categories and format and Draft Section in DEIR/DEIS, including quarterly reports to the LA-32 Neighborhood Council.

Thank You

Dr. Tom Williams, Senior Technical Adviser, Citizens Coalition for A Safe Community

[4117 Barrett Rd., LA 90032](#)-1712 323 528 9682

More to COME

From: Prijatel, Jean <PRIJATEL.JEAN@epa.gov>
Date: Thu, Oct 18, 2018, 4:43 PM
Subject: EPA Scoping Comments for Rose Hill Courts Redevelopment Project
To: robert.manford@lacity.org <robert.manford@lacity.org>

Dr. Manford,
Thank you for the opportunity to provide scoping comments for the Rose Hill Courts Redevelopment Project. Our comment letter will be sent via USPS tomorrow. Here is a scanned copy.

Please let me know if you have any questions.

-Jean Prijatel

Jean Prijatel
Environmental Review Section
US Environmental Protection Agency Region 9
75 Hawthorne St. (ENF 4-2)
San Francisco, CA 94105-3941
415-947-4167



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

October 19, 2018

Robert Manford
City of Los Angeles Housing, Community Investment Department
1200 West 7th Street, 8th Floor
Los Angeles, California 90017

Subject: Comments on Notice of Intent to Prepare a Draft Environmental Impact Statement for the Rose Hill Courts Redevelopment; Los Angeles County, CA

Dear Dr. Manford:

The U.S. Environmental Protection Agency (EPA) has reviewed the Office of the Assistant Secretary for Community Planning and Development, Housing and Urban Development (HUD) Notice of Intent to Prepare a Draft Environmental Impact Statement (DEIS) for the Rose Hill Courts Redevelopment. Our comments are provided pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

EPA recognizes the need for the City of Los Angeles to increase its supply of affordable housing consistent with population growth projections. The Rose Hill Courts Redevelopment project would remove 100 existing multi-family units and replace them with 191 units within the original project footprint. The DEIS will follow an Environmental Assessment developed for this project that identified several areas that could result in significant impacts, including, but not limited to, air quality, lead and asbestos, and energy use.

EPA appreciates the opportunity to review this notice and is available to discuss our comments. When the draft EIS prepared for this proposed action is released for public review, please send one hard copy and one CD to the address above (mail code: ENF-4-2). If you have any questions, please contact me at 415-947-4167 or prijatel.jean@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jean Prijatel".

Jean Prijatel
Environmental Review Section

Enclosure: EPA's Detailed Comments

EPA DETAILED COMMENTS ON THE NOTICE OF INTENT TO PREPARE A DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE ROSE HILL COURTS REDEVELOPMENT; LOS ANGELES COUNTY, CA—OCTOBER 18, 2018

Purpose and Need

EPA recommends that the draft Environmental Impact Statement (DEIS) for the proposed project clearly identify the underlying purpose and need to which the City of Los Angeles (City) is responding in proposing the range of alternatives (40 CFR 1502.13). The *purpose* of the proposed action is typically the specific objectives of the activity, while the *need* for the proposed action may be to eliminate a broader underlying problem or take advantage of an opportunity.

The project purpose is essential for defining the range of alternatives to be considered for the project. The purpose and need should be a clear, objective statement of the rationale for the proposed project, as it provides the framework for identifying project alternatives. The DEIS should concisely identify why the project is being proposed, why it is being proposed now, and should focus on the specific desired outcomes of the project (e.g. affordable housing) rather than prescribing a predetermined resolution.

Alternatives Analysis

In the draft document, evaluate in detail all reasonable alternatives that fulfill the project's purpose and need, including alternatives outside the legal jurisdiction of the City (40 CFR Section 1502.14(c)). Provide a clear discussion of the reasons for the elimination of alternatives that are not evaluated in detail.

A robust range of alternatives will include options for avoiding significant environmental impacts. The draft document should clearly describe the rationale used to determine whether impacts of an alternative are significant or not. Determine thresholds of significance by considering the context and intensity of an action and its effects (40 CFR 1508.27).

The environmental impacts of the proposed action and alternatives should be presented in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decision maker and the public (40 CFR 1502.14). The potential environmental impacts of each alternative should be quantified to the greatest extent possible (e.g. quantity of emissions, decibels of noise).

Scope of Assessment

In determining the appropriate scope of the assessment to be conducted, please refer to the Council on Environmental Quality (CEQ) regulation at 40 CFR 1508.25, which defines the scope of an individual EIS as consisting of the range of actions, alternatives (see above), and impacts to be considered.

Indirect and Cumulative Impacts

Cumulative impact analyses describe the threat to resources as a whole, presented from the perspective of the resource instead of from the individual project. Cumulative impacts can result from individually minor, but collectively significant, actions taking place over a period of time (40 CFR §1508.7). Discussions of cumulative impacts are usually more effective when included in the larger discussions of environmental impacts from the action (the environmental consequences chapter), as opposed to discussing cumulative impact analyses in a separate chapter.

The cumulative impacts analysis should identify how resources, ecosystems, and communities in the vicinity of the project have already been, or will be, affected by past, present, or future activities in the

project area. These resources should be characterized in terms of their response to change and capacity to withstand stresses. Trends data should be used to establish a baseline for the affected resources, to evaluate the significance of historical degradation, and to predict the environmental effects of the project components.

Air Quality

The Draft Environmental Impact Statement (DEIS) should provide a detailed discussion of ambient air conditions (baseline or existing conditions), National Ambient Air Quality Standards (NAAQS), criteria pollutant nonattainment areas, and potential air quality impacts of the project (including cumulative and indirect impacts) for each fully evaluated alternative.

General Conformity

The DEIS should address the applicability of Clean Air Act (CAA) Section 176 and EPA's general conformity regulations at 40 CFR Parts 51 and 93. Federal agencies need to ensure that their actions, including construction emissions subject to state jurisdiction, conform to an approved implementation plan. Mitigation may be available to reduce the project's air emissions, including particulate matter less than 10 and 2.5 microns in diameter (PM₁₀ and PM_{2.5} respectively), diesel particulate matter (DPM), ozone precursors (oxides of nitrogen (NO_x)) and volatile organic compounds.

Recommendations:

- Provide a detailed discussion of ambient air conditions (baseline or existing conditions), National Ambient Air Quality Standards (NAAQS), and criteria pollutant maintenance areas.
- Include a thorough analysis of impacts (including cumulative and indirect impacts) from the construction and operation of the proposed alternatives. Include monitoring data, any anticipated exceedances of NAAQS, and estimates of all criteria pollutant emissions.
- Discuss potential air quality impacts in the context of conformity requirements and associated state implementation plans.
- Disclose available information about the health risks associated with emissions, sensitive receptors in the vicinity of the project area, and how the proposed project will affect current emission levels. Include information about current emissions along with anticipated emissions at interim and full build phases of the proposed project.
- Describe specific commitments to mitigate emissions that will prevent degradation of air quality and reduce health impacts. Include an estimate of the air quality benefits and reduced health effects that result from each mitigation measure proposed in the DEIS. Identify any specific mitigation measures considered for sensitive populations (including schools, daycare facilities, hospitals, elderly care facilities, etc.).

Construction Emissions

EPA recommends that the DEIS and Record of Decision include a Construction Emissions Mitigation Plan for fugitive dust and diesel particulate matter (DPM). Please consider the following best available control measures (BACM) for all pollutants when preparing the Construction Emissions Mitigation Plan.

Fugitive Dust Source Controls:

- Stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative where appropriate. This applies to both inactive and active sites, during workdays, weekends, holidays, and windy conditions.
- Install wind fencing and phase grading operations where appropriate. Operate water trucks or

consider other options for stabilization of soil and disturbed surfaces under windy conditions.

- When hauling material and operating non-earthmoving equipment, prevent spillage and limit speeds to 15 miles per hour (mph). Limit speed of earth-moving equipment to 10 mph.

Mobile and Stationary Source Controls:

- Reduce use, trips, and unnecessary idling from heavy equipment.
- Maintain and tune engines per manufacturer's specifications to perform at EPA certification levels, where applicable, and to perform at verified standards applicable to retrofit technologies. Employ periodic, unscheduled inspections to limit unnecessary idling and to ensure that construction equipment is properly maintained, tuned, and modified consistent with established specifications.
- Prohibit any tampering with engines and require continuing adherence to manufacturer's recommendations.
- If practicable, lease new equipment meeting the most stringent of applicable federal standards, commit to using the best available emissions control technologies on all equipment, and where appropriate use alternative fuels such as natural gas and electric.
- Utilize EPA-registered particulate traps and other appropriate controls where suitable to reduce emissions of DPM and other pollutants.

Administrative controls:

- Coordinate with appropriate air quality agencies to identify a construction schedule to minimize cumulative impacts from multiple development and construction projects in the region, if feasible, to minimize cumulative impacts.
- Identify all commitments to reduce construction emissions and update the air quality analysis to reflect additional air quality improvements that would result from adopting specific air quality measures.
- Identify where implementation of mitigation measures is rejected based on economic infeasibility.
- Prepare an inventory of all equipment prior to construction and identify the suitability of add-on emission controls for each piece of equipment before groundbreaking. (Suitability of control devices is based on: whether there is reduced normal availability of the construction equipment due to increased downtime and/or power output, whether there may be significant damage caused to the construction equipment engine, or whether there may be a significant risk to nearby workers or the public.)
- Develop a construction traffic and parking management plan that minimizes traffic interference and maintains traffic flow.
- Identify sensitive receptors in the project area, such as children, elderly, schools, and hospitals, and specify the means by which you will minimize impacts to these populations. For example, locating construction equipment and staging zones away from sensitive receptors and fresh air intakes to buildings and air conditioners.

Children's Environmental Health

Executive Order 13045 on Children's Health and Safety directs each Federal agency, to the extent permitted by law, to make it a high priority to identify and assess environmental health and safety risks that may disproportionately affect children, and to ensure that its policies, programs, activities, and standards address these risks. Analysis and disclosure of these potential effects under NEPA is necessary because some physiological and behavioral traits of children render them more susceptible and vulnerable than adults to environmental health and safety risks. The DEIS should describe the potential

direct, indirect, and cumulative impacts of the project on children's health. Because children spend an average of 35% of their time at schools and the project is located near an elementary school, EPA recommends consideration of school-related mitigation measures, in addition to other mitigation measures that may reduce impacts to children.

Please consider the following for this discussion:

- Information on childhood asthma rates and other relevant health data if available;
- Potential respiratory impacts, including asthma, from construction activities and increased traffic flow;
- Potential noise impacts to health and learning, especially near schools, homes, and childcare centers.

EPA recommends that the City consider as a mitigation measure engaging schools most impacted by the proposed project in outreach around EPA's Tools for Schools Indoor Air Quality program¹.

Asbestos and Lead-Based Paint

The Environmental Assessment published for the project indicated that lead-based paint and asbestos containing materials were found during testing of the existing buildings on the site. The DEIS should include this report and describe how the materials will be handled. Asbestos is regulated under Section 112 of the Clean Air Act (CAA) as part of the National Emissions Standards for Hazardous Air Pollutants (NESHAPs) program (40 CFR Part 61). The Asbestos NESHAPs cover demolition or renovation projects and requires that the owner/operator thoroughly inspect the facility for asbestos prior to the start of demolition or renovation and requires that all regulated asbestos-containing material be properly removed prior to the start of demolition or renovation. All individuals who inspect for asbestos, develop management plans, and conduct abatement work must be certified per the Asbestos Hazard Emergency Response Act (AHERA).

The DEIS should describe measures that will be taken to meet NESHAPs and AHERA requirements regarding proper removal and disposal of asbestos-containing structural materials to avoid accidental release of friable asbestos during the project. The DEIS should include a clearance program that would be conducted to ensure against human health or environmental risks at the site after movement/demolition activities are completed. HUD is also subject to the Bay Area Air Quality Management District's asbestos removal requirements, which should be discussed in the DEIS.

Energy Conservation and Efficiency, Renewable Energy

The DEIS should evaluate energy conservation potential of the alternatives as required by the CEQ NEPA Regulations (40 CFR 1502.14(e)). The project should include energy efficiency measures and these measures should be built into the project description. In addition, the project location is conducive to solar energy generation, such as rooftop photovoltaics (PV), and/or PV on carports over parking lots. Solar water heating should be discussed and evaluated.

Environmental Justice

Executive Order 12898 addresses Environmental Justice in minority and low-income populations, and the Council on Environmental Quality (CEQ) has developed guidance concerning how to address Environmental Justice in the environmental review process². *Promising Practices for Environmental Justice Methodologies in NEPA Reviews* (March 2016) is a compilation of methodologies from current

¹ <https://www.epa.gov/iaq-schools>

² <http://ceq.hss.doc.gov/nepa/regs/ej/justice.pdf>

agency practices identified by the NEPA Committee of the Federal Interagency Working Group on Environmental Justice. The document focuses on the interface of environmental justice considerations through NEPA processes and provides recommendations on applying environmental justice methodologies that have been established in federal NEPA practice.

Recommendations:

- Consider *Promising Practices for EJ Methodologies in NEPA Reviews* when developing the EJ section of the DEIS.
- Include a description of the area of potential impact used for the environmental justice impact analysis and provide the source of demographic information.
- Define potential environmental justice concerns, including any environmental justice issues raised during scoping meetings. Discuss the key issues where environmental justice is potentially a concern, such as relocation, air quality, noise, vibration, access to property, pedestrian safety, etc.
- Define the “reference community” and the “affected community.” The definitions of each are used to analyze whether there are disproportionately high and adverse human health or environmental impacts by comparing the impacts to the affected community with the impacts to the reference community.
- Disclose whether the project will result in a disproportionate and adverse impact on minority or low-income populations. Ensure this conclusion is reported consistently throughout the DEIS. This statement should be supported by sufficient information for the public to understand the rationale for the conclusion.
- Propose appropriate mitigation if disproportionately high and adverse impacts on minority or low-income populations are likely to result from the proposed action and any alternatives.

From: El Sereno [mailto:eshs.org@gmail.com]
Sent: Monday, October 22, 2018 6:59 AM
To: RHCRdev CEQA <RHCRdev.CEQA@hacla.org>
Cc: Paul Habib <Paul.Habib@lacity.org>; Jose Huizar <Councilmember.Huizar@lacity.org>; politicostrategiesinc@gmail.com; Dhiraj Narayan <Dhiraj.Narayan@hacla.org>; rolson@related.com; awhite@related.com
Subject: Rose Hill Courts Redevelopment

To Dhiraj Narayan, Development Officer

Please include my comments/concerns as part of the public record for the Rose Hill Courts Redevelopment Project. I am concerned with the description of where the Rose Hill Courts are located. There are a couple of misinforming statements made both in the Initial Study CEQA analysis and the National Environmental Policy Act (NEPA). Both the CEQA and NEPA documents erroneously state that the Rose Hill Courts Redevelopment projects is either in the Rose Hill neighborhood or the Rose Hills neighborhood of Los Angeles (see attachment 1 and attachment 2).

It needs to be clarified that the Rose Hill Courts Redevelopment project is located within the community of El Sereno. This is substantiated with the map that is included in the Initial Study CEQA Analysis, page 19, that clearly shows that the Rose Hill Courts Redevelopment project is within the community of El Sereno.

It is important that these reports are accurate in the site location and that current and future residents are not misinformed. Please update the documents to reflect the correct community the Rose Hill Courts Redevelopment project is located in.

Sincerely,

Jorge Garcia, President
El Sereno Historical Society



City of South Pasadena

Mt. Washington

Highland Park

Project Location

City of Los Angeles

Elysian Park

Lincoln Heights

El Sereno

Echo Park

The project would require the following discretionary approvals: (1) Disposition and Development Agreement approval from HACLA; (2) Grading and Building Permits from the City of Los Angeles Department of Building and Safety; (3) Public Benefits Project and Alternative Compliance approval from the Los Angeles Department of City Planning; (4) National Environmental Policy Act (NEPA) Part 58 Compliance necessary for Demolition/Disposition and Rental Assistance Demonstration (RAD) Conversion of the existing Rose Hill Courts development to Section 8 Project Based Vouchers from the United States Department of Housing and Urban Development (HUD); (5) Certification of the Environmental Impact Report/Environmental Impact Statement; (6) Haul route approval from the Los Angeles Department of Building and Safety (if required); (7) Permit for removal of street trees from the Los Angeles Board of Public Works (if required); and (8) Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and sign permits in order to execute and implement the Project.

This is to be a combined environmental document, an EIR, prepared under the State of California CEQA (Public Resources Code 21000 et seq. and 14 California Code of Regulations 15000 et seq.), and an EIS, prepared under NEPA (42 U.S.C. 4321) and implementing regulations of the Council on Environmental Quality (40 CFR parts 1500–1508) and HUD (24 CFR Part 58).

The project proposes the demolition of all 15 buildings at Rose Hill Courts and subsequent construction of 191 affordable public housing units. Rose Hill Courts was constructed in 1942 by HACLA as a low-income public housing project. Rose Hill Courts was determined eligible for listing in the National Register of Historic Places. The Rose Hill Courts complex is located at 4446 Florizel Street, on a 5.24-acre site. The site is located within the Northeast Los Angeles Community Plan, in the Rose Hills neighborhood area of the City of Los Angeles.

Existing Conditions and Trends³ [24 CFR 58.40(a)]: Describe the existing conditions of the project area and its surroundings, and trends likely to continue in the absence of the project.

The Rose Hill Courts complex is located at 4446 Florizel Street, on an improved 5.24-acre site. The site is located within the Northeast Los Angeles Community Plan area, in the Rose Hill neighborhood area of the City of Los Angeles (City), approximately 10 miles from downtown Los Angeles. Local surface streets surrounding the site include: Florizel Street to the north; McKenzie Avenue to the east; Mercury Avenue to the south; and Boundary Avenue to the west. In addition, a driveway bisects the housing complex from west to east. Mercury Avenue, a City collector street, provides direct access to the project site from Monterey Road and Huntington Drive.

The site (APN 5305-011-900) is located on a slope. The boundary is further described as "TRACT # 13089, Lots 1, 2, 3, 4, 5, and 6." The northwestern end of the project site is the highest point and the southeastern end of the project site is the lowest point. Surface water drainage at the site appears to be by sheet flow along existing ground contours to the City streets.

Statutory Checklist
[24 CFR §58.5]

From: Tom Williams <ctwilliams2012@yahoo.com>

Date: Mon, Oct 22, 2018 at 2:05 PM

Subject: ROSE HILL COURTS REDEVELOPMENT EIR/EIS - Scoping/Assessment - Scoping Comments and Requests

To: robert.manford@lacity.org <robert.manford@lacity.org>, "Dhiraj Narayan" <RHCRdev.CEQA@hacla.org>

Cc: Jose Huizar <jose.huizar@lacity.org>, Jimmygomezforcongress Info <info@jimmygomezforcongress.com>, Kevin James <kevin.james@lacity.org>, Ywatson dslextreme.com <ywatson@dslextreme.com>, Barbara Hensleigh <barbarajhensleigh@gmail.com>

Oct. 20/22 2018

To: HACLA/HCILA
ATTN.: Dr. Robert Manford, Environmental Affairs Officer, Plang., Ld. Use, Finc. & Devlpmnt. Div., City Housing + Comm.Invest. Dept. robert.manford@lacity.org 213-252-2739

Dhiraj Narayan, Development Officer, Development Services, HACLA
2600 Wilshire Blvd., Los Angeles, CA 90057
RHCRdev.CEQA@hacla.org <http://hcidla.lacity.org/NEPA-review>
213-252-6120

cc: CD14, LA-32 Neighborhood Council, LACo Supervisor, State Ass./Sntr.,
Congressional District: J.Gomez- , Senator D.Fienstein

FROM: Dr. Tom Williams, Snr. Techn. Adviser, Citizens Coalition for A Safe Community
4117 Barrett Road, LA, CA 90032-1712

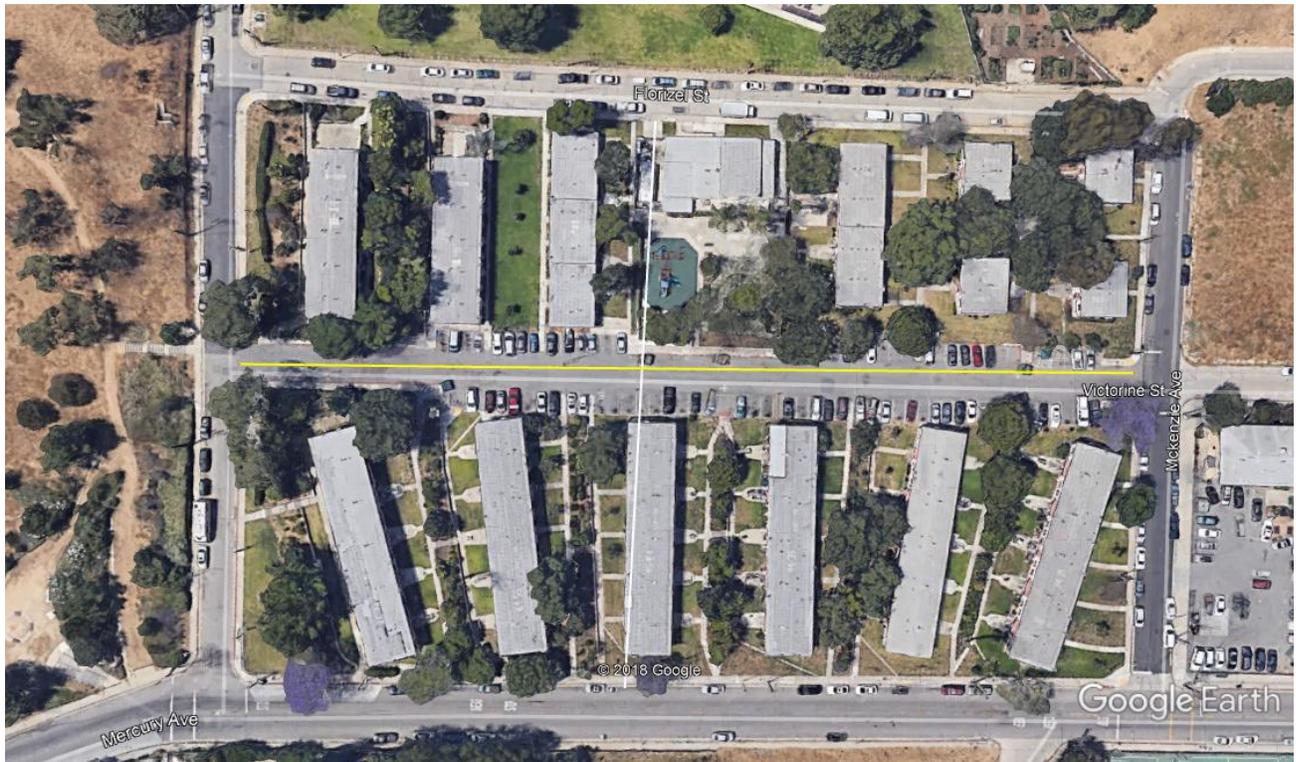
SUBJECT: ROSE HILL COURTS REDEVELOPMENT EIR/EIS - Scoping/Assessment
RE: Scoping Comments and Requests
Resources Sector, Impact Assessment, Alternatives, and MMRP

During review of the NOI and NOP for scoping the DEIR/DEIS, we have found both documents to be prejudiced and not objective and do not promote or provide the basis for neighborhood/community participation.

Environmental justice must be considered and assessed as the entire Project is related to environmental justice.

Many elements are inadequately ands incompletely discussed and several dismissed from further considerations without meaningful mitigation.

SEE Attachment:



Oct. 20/22 2018

To: HACLA/HCILA
ATTN.: Dr. Robert Manford, Environmental Affairs Officer, Plang., Ld. Use, Finc. & Devlpmnt. Div.,
City Housing + Comm.Invest. Dept. robert.manford@lacity.org 213-252-2739

Dhiraj Narayan, Development Officer, Development Services, HACLA
2600 Wilshire Blvd., Los Angeles, CA 90057
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4117 Barrett Road, LA, CA 90032-1712

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Environmental justice must be considered and assessed as the entire Project is related to environmental justice. Many elements are inadequately ands incompletely discussed and several dismissed from further considerations without meaningful mitigation.

Below are some of the many comments/requests we have for the Scopes of the DEIR/DEIS.

#1 ALTERNATIVES

ALT. 1 Bigger - Provide a Maximum Dwellings Alternative (>x2 project of 190+ DUs) 380 DUs - noise, dust, NO vehicle parking, trees, ada accessibility bus/shuttle improvements-MTa-252, ACCESS, DASH affordables - 30% of

\$50K/Hhd.-yr = \$15,000/yr = \$1250/2-BdRm/1Bth priorities for housing - 90032 residents (<\$50K/yr for 5yr)
Current, aged/seniors, disabled, vets, extremely-Very low income families
Include Supportive Housing
Eliminate resident parking spaces or limit to those only for community facilities/Maintenance/Op.s (30 spaces);
Limited height to same existing highest roof elevations from East-West and N-S - SE-494ft, NW-535/526ft, Grd.
Elev. SE-487/NW-532ft = excavate to Gd-480 with Rf-535ft = 55ft = 4 flrs for all buildings;

ALTERNATIVE 2 Provide Recreation-Focused Integrated Project Site with 200-400 DUs and Open Space linked with BHRecCntr.(south) and Debs Park (new purchases two vacant lots SW and E of site).

ALT. 3 – Provide a **Conservation-Focused/LEED Alternative** including Alternative - with:

- 3.1 Solar Panels for shading roofs of all building and roof-top recreational areas for building occupants;
- 3.2 All dwelling units with energy/water efficient fixtures;
- 3.3 Shading and louvered screens of exterior windows;
- 3.4 1.5 Achieve Silver-Platinum LEED certifications.

#2. Geology and Seismicity –

4.6-2/6 A Geotechnical Investigation was prepared for the project....effects of ground shaking can be mitigated if the proposed structures are designed and constructed in conformance with **current** building codes and engineering practices (Geocon, 2018, p. 5)....required to comply with all City of Los Angeles building codes and engineering practices. Thus, the project would have a less than significant impact regarding strong seismic ground shaking. **This issue will not be analyzed further in the EIR/EIS that will be prepared for the project.**

5-3 Geocon West, Inc. (Geocon), 2018. Geotechnical Investigation Proposed Improvements to **Existing** Multi-Family Residential Structures Rose Hill Courts. May 16. "**Proposed** Multi-Family Residential Structures Rose Hill Courts Redevelopment..." **IS-Appendix C**

Provide a thorough description, assessment, and mitigation for Geology and Seismicity, including:

- 2.1 Search of SoCal Earthquake Data Center for all recorded earthquakes and their associated fault lines within 2640ft radius of site - Ttl: 108 EQs: 16 at >2.0RM 6 EQ: <10,000ft depth & deepest <60,000ft, since 1950;
- 2.2 Design all structures for RM-6 and Peak Ground acceleration of 0.5G;
- 2.3 During excavations, digitally record bedrock and conduct geologic description of underlying bedrock;
- 2.4 Early warning seismic sensors/reporter.

#3. Provide in DEIR/S a Draft MMRP for the Project - including:

- .1 Mitigation - detailed scope/schedule, responsible agency, and funding;
- .2 Monitoring - Construction, Start-Up, and Completion/Early Operations;
- .3 Reporting - Monthly - Yr.1, Quarterly - Yr 2-4, & annual - Yr 5-10.

#4 4.14 Public Services Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities,..., in order to maintain acceptable service ratios, response times or other **performance objectives** for any of the public services:
Provide Project assessment for public services during construction and operations periods.

#5 Provide numerical/quantifiable Purposes and Needs (Fed)/Goals-Objectives(Cal)

The intent of the project is to: improve existing living conditions for low-income residents and provide additional affordable housing units.

continue to ensure that low- and moderate-income housing units are equitably distributed throughout the Northeast Los Angeles Community Plan area

on a fair share basis in relationship to all other planning areas within the City.

contributing to the maintenance and expansion of low-income housing stock within the Los Angeles region.

These are not suitable for quantitative comparisons and formulations of mitigative alternatives.

IS-1-7 1.11 Organization of **Initial Study...Section 3.0** - Project Description, which provides an **overview of the project objectives**, a description...phasing..., and discretionary actions.... **Project Objectives or "overview" were not included in IS, therefore, no factual basis is provided for proposing mitigation and alternatives, major functions of this scoping.**

Provide objectives with quantified parameters and criteria for mitigations, alternatives, and comparisons.

#6 p.8 NOI

Offsite Improvements...anticipated that offsite utility improvements will need to be made in the public right of way for utilities such as water, **sewer**, and electricity.

These offsite improvements would be limited to only the public right of way...surrounding the projects site: Florizel Street, Boundary Avenue, Mackenzie Avenue, and Mercury Avenue.

...trenching and installation of additional utility lines and pipes to provide additional water, sewer, and electrical service to the project site.

#7 p.13 Environmental Justice – PROVIDE EJ Section/Sector for DEIR/S

Environmental Justice [Executive Order 12898] Compliance steps would not be invoked.

In 2010, the per capita income for the **Northeast Community Plan area**, where the project site is located was **\$20,965, per person**.¹² [12 City of L.A., Health Atlas for the City of Los Angeles, Chapter 4: Economic Conditions, June 2013, pg. 29.] **These are meaningless...need local area and household size, 4 x \$21K = \$84K/ household.**

Provide updated 2016 Cal Dept.Fin./SCAG Population, age structure, ethnicity, household incomes, ownership, household size, etc. for the Rose Hill precincts and precincts within 500ft of the same.

The **Northeast Los Angeles Community** is identified as having one of the **lowest per capita** income by Community Plan within the City of Los Angeles. **Household vs Per Capita.**

Provide specific comparisons for Rose Hill (precinct) compare to 90032, and to NELA Community Plan

The project includes the demolition of **100 affordable** multi-family dwelling units; however, it would construct 191 affordable multi-family dwelling units **reserved for families earning between 30 to 50 percent of the area median income.** **Here families not per capita??...\$\$\$\$???- 90032 or RH census tracts.**

Provide describers for current residents and those expected to return from relocation.

The project is not expected to result in alteration of the demographic character or socioeconomic context of the area. **Based on what? \$\$\$\$???- 90032 or RH census tracts.**

Provision of relocation and return discriminates based on current location of residents and does not provide equitable distribution of DUs based on more universal criteria. Residents of 90032 are not provided with same parameters and rights as those of Rose Hill Courts, now.

The project would benefit the **community at large** by continuing to provide affordable housing to low-income families in an area that is **already highly characterized by residential development.** Development of the project would address the City of Los Angeles' **goals and the growing need of providing equitable and affordable housing to all**...p.14...segments of the population.

No impact would occur.

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

No definition of "community" or "at large"

IS-4.19-3/3 **Socioeconomics and Environmental Justice**

The NEPA of 1969 requires...agencies to address significant adverse environmental effects on these communities in mitigation measures... **The EIS/EIR to be prepared for the project will analyze the topics**

of socioeconomics and environmental justice in compliance with NEPA.

Provide clarification, and inclusion of EJ in both DEIR/DEIS.

#8 Cultural & Tribal Resources

Acquire, provide, review, and assess: 1923 Aerial Photos in City Hall next to 525A, and EDR 1928, 1933, 1938, and 1943; review and assess historic/cultural resources of earlier and construction of existing structures on the Project site show demolition of earlier structures and replacement by existing structure.

Document earlier structure locations, possible rubbish/privy sites and potential subsurface remains to be reviewed/recovered during excavation and grading.

Provide structure to present history, photos, and materials of historic and archaeological, and geologic importance for the Project site, vicinity, and community.

9. Provide setting/assessment for Cultural Resources - Historic Resources including:

9.1 Env.Data Res. (<https://ednet.com/>) historic aerial photos, 1923, -28, -33, -38, & -43;

9.2 Review of photos for structure foundations, historic "garbage dumps", and "privies" (pit toilets);

9.3 Compile all documents and incorporate into a historic/environmental archive within the Project Community facilities.

#10 Air Quality Greenhouse Gas Emissions, & Noise

Provide description and assessment for ON/OFFSITE

construction employee and truck parking

staging and equipment/supplies storage

haul routes and other potential associated haul projects in the Soto Corridor south of the Project site, e.g., 4208 N.Hngtn.Dr., Onyx 32, etc..

#11 Hazards and Hazardous Materials

Provide review and assessment for existing site hazards (USTs, asbestos, asbestos/cement, and leaded paints) and of potential historic sources from pre-1941 materials left in place from earlier demolition.

#12 Land Use and Planning & Population and Housing

Provide review and assessment for existing and with Project community/Project Safety onsite and within 500ft of

#13 Public Services Recreation, & Transportation and Traffic

Provide review and assessment for existing and with Project community/Project Safety onsite and within 500ft of Project perimeter.

Provide mitigative/compensatory measures for site and vicinity safety and personal/property security, including lighting, cameras, recorders, etc. with remote and LAPD monitoring capacity. Provide Security Element for Dwellings, Structures, Site, & Neighborhood, including: Videos Noise Locators Alarms Patrols Elevators/Emergency Accesses

#14. Provide Project Transportation including shuttle, ACCESS, DASH, and Metro 252 parking pull out(s), Circle-Site routes on all four sides of site;

Provide review and assessment for all transportation activities, including Safe Routes, other pedestrian routes, bike lanes, and bus/van/shuttle loading facilities for the Project site, vicinity (500ft) and to major transportation hubs/connectors/centers which may be used by neighbors and Project residents.

Improve bus transit for Project Site - Shuttle/Access, DASH, and MTA 252

#15 Recreation Services/Resources Assess and mitigate construction impacts on Debs Park recreation areas (north) and RH-Recreation Center (south); mitigation by purchase of Mercury/Galena SW corner lot and the MacKenzie/Florizel-Brown East side lot.

#16 Utilities and Service Systems

Review existing capacities, flows, aging for sewer, drains, and fire hydrants, assess Project effects and provide suitable mitigative system improvements

#17. Provide assessment for Hydrology and Drainage and Water Quality and thorough LID/Groundwater

Assessment - LID Mitigation for all roofs and impervious ground surfaces, including: Drainage to underground detention tanks (<466ft elev.) with irrigation of Debs Park and RH-Rec.Cntr. and purple-piped local 500ft radius; Based on local easterly geology evaluate groundwater infiltration.

Historic aerial photos and google Earth images of 1994 show south-east flowing drainage from south Debs Park to Florizel/McKenzie intersection, subsequently graded before 2003. Such features can be incorporated into a recharge element of a LID project for the Project site and connected with irrigation systems of the adjacent area of Debs Park.

#18. Provide ADA Compliance Setting/assessment for Site, Total 7 existing curb-cut ramps for required 6 intersections x 3-4 ramps = 21+,

Provide increases of ramp to 20+ and with additional four intermediate ramps on E-W streets;

Eliminate all steps (=>1/2inch) / provide wheel-chair usable ramps throughout site;

#19. Review/Revise 5.0 REFERENCES

5-1/ Architectural Resources Group, 2012. Garden Apartments of Los Angeles County, Historic Context Statement, Architectural Resource..., October 2012. **Unavailable to public.**

Army Corps of Engineers, n.d. National Inventory of Dams. Accessed online at: http://nid.usace.army.mil/cm_apex/f?p=838:12:3193029020618 on April 3, 2018. **Incorrect citation and position in references.**

Altec Testing & Engineering, Inc. (Altec), 2018. Phase I Environmental Site Assessment. Rose Hill Courts. April 20. **Unavailable to public.**

Baldwin et al., 2012. The Jepson Manual: Vascular Plants..., second edition. **Unavailable to public.**

5-4/ Los Angeles City, Department of City Planning, 2016. Recommendation Report. Accessed online at: <http://planning.lacity.org/ordinances/docs/parksdedication/QuimbyFinal.pdf> on May 25, 2018. **Incorrect citation and position in references.**

5-4/ California Department of Conservation (DOC), 1982. Division of Mines and Geology Report: Investigation and Inventory of Slope Failures that Occurred in 1978 and 1980 in the Los Angeles 7.5-Minute.... **Incorrect citation and position in references.**

#20. Review/Revise/Provide 6.0 LIST OF PREPARERS with resumes, including certifications and elements prepared.

From: Kelly Tsou
Sent: Monday, October 22, 2018 3:23 PM
To: Dhiraj Narayan <Dhiraj.Narayan@hacla.org>
Subject: RHC - LA County Registrar filed draft EIR

Hello Dhiraj,

We received the attached filed Rose Hill Courts EIR document in the mail today.

I have placed the hard copy in the Rose Hills Courts folder along with the other comments to EIR

Sincerely,

Kelly Tsou
Administrative Assistant
Asset Management | Development Services
Housing Authority of the City of Los Angeles
2600 Wilshire Blvd., 4th floor, Los Angeles, CA 90057
T: 213-252-8840 | F: 213-252-2742
Kelly.Tsou@Hacla.org

THIS NOTICE WAS POSTED

ON September 19 2018

UNTIL October 19 2018

REGISTRAR – RECORDER/COUNTY CLERK



NOTICE OF PREPARATION DRAFT ENVIRONMENTAL IMPACT REPORT AND PUBLIC SCOPING MEETING

September 19, 2018

2018 238343



FILED

Sep 19 2018

Dean C. Logan, Registrar – Recorder/County Clerk

Electronically signed by LAKEISHA MCCOY

PROJECT NAME: Rose Hill Courts Redevelopment
PROJECT APPLICANT: Related California
PROJECT ADDRESS: 4446 Florizel Street, Los Angeles, CA 90032
COMMUNITY PLAN AREA: Northeast Los Angeles Community Plan Area
LA COUNCIL DISTRICT: 14 – Huizar
PUBLIC COMMENT PERIOD: September 19, 2018 – October 22, 2018
SCOPING MEETING: 5:00 P.M. – 7:00 P.M., October 4, 2018. See below for additional information.

The Housing Authority of the City of Los Angeles (HACLA), which is the Lead Agency under CEQA (CEQA Lead Agency) for the proposed project, will be preparing a joint Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the proposed Rose Hill Courts Redevelopment (Project). Pursuant to the California Environmental Quality Act (CEQA), Public Resources Code sections 21000 et seq. and the State CEQA Guidelines, Title 14 of the California Code of Regulations, section 15000 et seq., the Lead Agency has the principal responsibility for carrying out or approving a project and decides whether the project may have a significant effect on the environment. The U.S. Department of Housing and Urban Development, acting through the City of Los Angeles Housing + Community Investment Development (HCID) as the NEPA Lead Agency and Responsible Entity in accordance with Title 24 of the Code of Federal Regulations Part 58, is preparing the Environmental Impact Statement in compliance with the National Environmental Policy Act.

In accordance with State CEQA Guidelines section 15082, HACLA has prepared this Notice of Preparation to provide the public, nearby residents/businesses and property owners, responsible agencies, and other interested parties with information regarding the Project and its potential environmental effects.

The CEQA Lead Agency requests your written comments as to the scope and content of the EIR/EIS, including mitigation measures or project alternatives to reduce potential environmental impacts from the Project. Comments must be submitted in writing according to directions below. If you represent a public agency, HACLA seeks written comments as to the scope and content of the environmental information in the EIR/EIS that are germane to your agency's statutory responsibilities in connection with the Project. Your agency may need to use the EIR/EIS when considering your permit or other necessary approvals for the Project.

A Public Scoping Meeting will be held to receive input regarding environmental areas of concern and topics the EIR/EIS should study. No decisions about the Project are made at the Public Scoping Meeting. Additional project details, meeting information, and instructions for public comment submittal are listed below.

PROJECT LOCATION AND EXISTING ON-SITE USES:

The Project is located at 4446 Florizel Street in the City of Los Angeles, 90032 between Boundary Avenue and McKenzie Avenue (Project Site). The Project Site is approximately 5.24 acres in size and is located in the City's Rose Hills neighborhood. The Project Site is currently developed with a public housing complex comprised of fifteen structures. Fourteen structures include a total of 100-multi-family units, and one structure is used as an

Date: Thursday October 4, 2018
Time: 5:00 p.m. – 7:00 p.m.
Location: Rose Hill Courts Community Building
4446 Florizel Street
Los Angeles, CA 90032

REVIEW AND COMMENTS:

The Initial Study is available for public review at HACLA at 2600 Wilshire Blvd, Los Angeles, CA 90057 and the Administrative Office of the Rose Hill Courts Community Center located at 4466 Florizel St., Los Angeles, 90032. To review the Initial Study, please contact Mario Ramsey at: (323) 342-6710 to schedule an appointment for viewing.

A copy of this notice and the Initial Study prepared for the Project may also be viewed at HACLA's website (<http://www.hacla.org/dsprojects/ID/8/Rose-Hill-Courts>). In addition, this notice and Initial Study will be available for review at the El Sereno Branch Library, located at 522 Huntington Drive S., Los Angeles, CA 90032 (T: 323/225-9201). In an effort to broaden community outreach, copies of this notice have been translated in Spanish and Vietnamese and are available at the above described locations and on the HACLA website. In the event of any inconsistency between this notice in English and a translated notice, this notice shall prevail.

HACLA will consider all written comments regarding the potential environmental impacts of the Project and issues to be addressed in the EIR/EIS. If you wish to submit comments, please reference the Project Name above, and submit them in writing by Monday, October 22, 2018 no later than 4:00 p.m. Written comments will also be accepted at the Public Scoping Meeting described above.

Please direct your comments to:

Mail: Dhiraj Narayan, Development Officer
Housing Authority of the City of Los Angeles
2600 Wilshire Boulevard
Los Angeles, CA 90057
Telephone: (213) 252-6120
E-mail: RHCRdev.CEQA@hacla.org

ACCOMMODATIONS: As a covered entity under Title II of the Americans with Disabilities Act, the Housing Authority of the City of Los Angeles does not discriminate on the basis of disability. The Public Scoping Meeting facility and its parking are wheelchair accessible. Sign language interpreters, assistive listening devices, or other auxiliary aids and/or services may be provided upon written request submitted a minimum of seven (7) working days in advance to: RHCRdev.CEQA@hacla.org.

Attachments:

Figure 1 - Conceptual Site Plan

*Puede obtener informacion en Espanol acerca de esta junta llamando al (323) 342-6710.
Quý vị có thể lấy thông tin bằng tiếng Việt về cuộc họp này xin vui lòng gọi số (323) 342-6710.*





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From: **Tom Williams** <ctwilliams2012@yahoo.com>

Date: Mon, Nov 12, 2018, 10:51 AM

Subject: Presentation Materials, November Design Update Meeting, 11/07/18, Rose Hill Courts Redev. Project

To: john.king@hacla.org <john.king@hacla.org>

Cc: RoseHillCourts@related.com <RoseHillCourts@related.com>, robert.manford@lacity.org <robert.manford@lacity.org>, RHCRdev.CEQA@hacla.org <RHCRdev.CEQA@hacla.org>

John King Dirtr., Community Engagement, HACLA 213-252-5464 john.king@hacla.org

RoseHillCourts@related.com Related Calif. LA Office 333 S.Grand Av Suite 4450 LA, CA 90071 213.984.4110

Dr. Robert Manford, Environmental Affairs Officer, Planning and Land Use, Finance & Development Division of the City of Los Angeles Housing, Community Investment Department, 1200 West 7th Street, 8th Floor, Los Angeles, CA 90017 robert.manford@lacity.org

Dhiraj Narayan, Development Officer, Development Services, HACLA, RHCRdev.CEQA@hacla.org, telephone number 213-252-6120

Could I please receive any digital copies of the presentation materials shown during the 12/07/18 public meeting?

Are you still interested in receiving any further comments?

Thank You
Dr. Tom Williams
323-528-9682