Environmental Assessment
Determinations and Compliance Findings for HUD-assisted Projects
24 CFR Part 58

PROJECT INFORMATION

Responsible Entity: [24 CFR 58.2(a)(7)]
Los Angeles Housing + Community Investment Department (HCID)
1200 West 7th Street, 1st Floor
Los Angeles, CA 90017

Certifying Officer Name/Title: Robert Manford, Environmental Affairs Officer & Manager
[24 CFR 58.2(a)(2)]

Project Name: Rose Hill Courts Redevelopment

Project Location: 4446 Florizel Street, Los Angeles, CA 90032

Estimated Project Cost: **$95,500,000**

Grant Recipient:
Rose Hill Courts
c/o Housing Authority
Housing Authority of the City of Los Angeles (HACLA)
2600 Wilshire Boulevard, 4th Floor
Los Angeles, CA 90057

Project Representative: Jenny Scanlin, Chief Strategic Development Officer

Telephone Number: 213-252-2500

Determination:

☐ **Finding of No Significant Impact** [24 CFR 58.40(g)(1); 40 CFR 1508.27]
The project will not result in a significant impact on the quality of the human environment.

☒ **Finding of Significant Impact** [24 CFR 58.40(g)(2); 40 CFR 1508.27]
The project may significantly affect the quality of the human environment.

Preparer Signature: Betsy A. Lindsay Date: 9/19/2018

Name/Title/Organization: Betsy Lindsay, President/CEO of UltraSystems Environmental

Certifying Officer Signature: _____ Date: 9/19/2018

Name/Title: Robert Manford, Environmental Affiars Officer & Manager, Planning and Land Use Unit

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

Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]

The proposed Rose Hill Courts Redevelopment ("the Project") is subject to the National Environmental Policy Act (NEPA); therefore, this Environmental Assessment (EA) has been prepared to analyze the effects of the project on the environment and the potential environmental impacts of the proposed action and project alternatives.

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

The existing apartment complex at the project site is comprised of fifteen structures, of which fourteen structures include 100-multi-family units, and one structure includes an Administration Building. The buildings throughout the complex are rectangular in site design and are generally arranged in parallel groupings. These groupings include:

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

The developer of the project is The Related Companies of California, LLC (Related). Related will be responsible for the redevelopment that is anticipated to occur in two phases during an 18-24 month time frame. During project construction, the complex residents would be required to be temporarily relocated. Specific tenant relocation assistance will be provided by Related during project construction. Residents will be provided relocation counseling, compensation for moving expenses, and provided with decent, safe and sanitary housing choices.

The intent of the project is to improve existing living conditions for low-income residents and to provide additional affordable housing units. The Rose Hill Courts Redevelopment would 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. The project would provide 191 apartment units on site, thereby contributing to the maintenance and expansion of low-income housing stock within the Los Angeles region.

As part of this NEPA process, the environmental review record (ERR), will to the fullest extent, utilize environmental documentation prepared as part of the CEQA process. It is anticipated that certain CEQA mitigation measures that would be utilized to substantially lessen or avoid significant effects on the environment would also be used as mitigation for NEPA topical areas. Information included in the Initial Study (IS)[1] prepared for the project, pursuant to the California Environmental Quality Act (CEQA), will be utilized in this EA, as necessary. The Initial Study precedes this document for reference.

Description of the Project[2] [24 CFR 58.32; 40 CFR 1508.25]**:** *Include all contemplated actions which logically are either geographically or functionally a composite part of the project, regardless of source of the funding.*

1 UltraSystems Environmental, Rose Hill Courts Redevelopment, Initial Study. June 2018.
2 IBID, Section 3.0 – Project Description.

The Rose Hill Courts Redevelopment (project) will demolish all the existing buildings and construct a total of 191 affordable housing units along with a property management and maintenance office on site, in two phases. The components of the project are listed below in **Table 1** and conceptually depicted in **Figure 1**.

Table 1
PROJECT SUMMARY

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

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

Figure 1
ROSE HILL COURTS REDEVELOPMENT SITE PLAN

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

Source: Withee Malcolm Architects, January 2018

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Rose Hill Courts Redevelopment

Site Plan

Open Space and Recreational Amenities
Several courtyards are proposed on site, each with a unique design theme and use. Outdoor space adjacent to the community building offers places for outdoor social gatherings, and special events and neighborhood celebrations, with shaded areas seating and BBQ grills for outdoor dining. Areas designed for use by children would feature tot-lots for use by children from 2-12 years of age. There would be play areas for children, from tot-lots to hard surface play, experiential play elements that encourage interaction and group play. The landscape design would create a park-like setting for residents.

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

Fencing
Project fencing would be located between buildings. Courtyard areas would be fenced from the street and pedestrian walks accessing perimeter streets would have combination of hedges and fencing to clearly define paths of access.

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

Architectural Design, Building Facades, and Rooflines
The architectural plan is based on creating a development with multiple building and unit types with shared amenities. The project would consist of two phases, Phase I will be comprised of two 4-story multi-family buildings. Each building would have dedicated parking, shared leasing, and community/outdoor amenities. The architectural style would be California Contemporary with flat parapet roofs, cement fiber board siding, and material and color accents.

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

Landscaping
The landscape design theme would complement the architectural style and would be California Eclectic with a selection of drought tolerant and low maintenance plant materials. The plants would be fire retardant due to the sensitivity of fire hazard in the area. Plant selections would be based on their aesthetic/horticultural value, durability, water use, and low maintenance. Tree selections such as Sycamore, Oaks Palo Verde, Mesquite, Western Redbud, Strawberry Tree, Desert Willow, Australian Willow, African Sumac, Palms, and Crape Myrtle etc. would be utilized on site due to their low water use and fire-retardant characteristics.

Water efficient dripline emitter tubing would be used in planting areas and dedicated low-flow bubblers would be utilized for irrigation of trees. Irrigation system improvements would include new

weather based "Smart controller" and a dedicated irrigation water meter. The irrigation methods for the project meet and exceed the City of Los Angeles Landscape Ordinance.

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

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

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

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

Domestic Water. Water to the project site is currently provided by the LADWP. Offsite mainline water system improvements may be necessary within the street right-of-way to accommodate the project.

Dry Utilities. Natural gas and electricity are provided to the project site by the Southern California Gas Company (SGC) and the Los Angeles Department of Water and Power (DWP). Offsite mainline electrical or natural gas improvements may be necessary within the street right-of-way to accommodate the project.

Catchment Basins
The existing site conditions and drainage infrastructure includes: one (1) curb catch basin along Florizel Street (some 100 feet west of Mackenzie Avenue); two (2) catch basins along the existing driveway (at Mackenzie Avenue), and two (2) curb catch basins at the site's southeast corner (along Mercury Avenue and Mackenzie Avenue). The proposed project grading/drainage design intends to re-use these existing catch basin features and/or possibly replace with new basin structures in similar locations. The existing site's general drainage pattern (from northwest to southeast) will not change with the new onsite improvements, and therefore, the existing street drainage scheme will not be significantly altered. The project's onsite improvements would include LID/SUSMP Best Management Practices (BMPs) for "store & re-use" that will retain and treat the 85th percentile 24-hour runoff event onsite. It is estimated that the project's post development storm water run-off flowing into drainage infrastructure would be less than the current/exiting conditions.

Signage
The project proposes various types of signage in a host of locations, such as the exterior and interior of buildings, along sidewalks and pathways, and in parking areas. Signs will be oriented for both pedestrian and vehicular traffic. The design of the signage will range from uniformly recognized traffic signs to custom signage for each building that will reflect the selected architectural style and exterior colors.

Construction Activities and Phasing
The proposed project at Rose Hill Courts would consist of the development of 191 affordable housing units in two phases.

Projected construction improvements are expected to occur starting in 2020 for Phase I and 2023 for Phase II. During Phase I, existing residents living in buildings scheduled to be demolished will be required to vacate their apartment units on site and temporarily relocate. For Phase II, residents in the remaining original buildings will be permanently relocated to the completed Phase I buildings. This phasing schedule will allow for a majority of the residents to remain onsite during project construction. Specific tenant relocation assistance will be provided by the HACLA during construction work activities in the apartments. A total of 32 buildings would be constructed onsite, with two buildings being built during Phase I and 30 buildings being constructed during Phase II.

Relocation Plan
Before any tenant relocation occurs, HUD must approve the project's relocation plan, which is currently under development (49 CFR 24 Subpart C). Consistent with HUD regulations for the treatment of itinerants, current residents who are in good standing will have the option to return to the property after construction is complete. Residents, living in units under the footprint of Phase 1, who wish to return will be temporarily relocated until construction of the buildings is complete. The residents who are living in the existing buildings within the footprint of Phase II will be moved and assisted into the Phase I units upon completion. Residents will be provided relocation counseling, compensation for moving expenses, and provided with decent, safe and sanitary housing choices. Additionally, the Relocation Plan will be considered by the Board of Commissioners and HUD, prior to any development at Rose Hill Courts. For relocation activities, Related/HACLA will take into consideration individual household preferences and needs to be close to public transportation, employment, schools, medical/public/social services and agencies, recreational services, parks, community centers, and/or shopping and will attempt to accommodate households by moving them to an available unit onsite. If such a unit is not available, the next preferred option would be for households to relocate into a nearby motel or an apartment unit and return to the Rose Hill Courts as soon as Phase I's construction is complete and the unit is ready for occupancy. For households that prefer to accept a HACLA issued Tenant Section 8 Voucher and permanently relocate from Rose Hill Courts, full relocation assistance for permanent replacement housing will be available.

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

Hazardous Material Removal
Hazardous materials exist on the project site, including lead and radon gas.

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

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

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

Offsite Improvements
As part of the project it is anticipated that offsite utility improvements will need to be made in the public right of way for utilities such as water, sewer, and electricity. These offsite improvements would be limited to only the public right of way in the streets surrounding the projects site: Florizel Street, Boundary Avenue, Mackenzie Avenue, and Mercury Avenue. Offsite improvements include trenching and installation of additional utility lines and pipes to provide additional water, sewer, and electrical service to the project site.

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

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

- **No Project/No Action Alternative.** This alternative would involve the continuation of uses on the site; therefore, existing buildings and tenants would remain at the project site and no new buildings or uses would be constructed or demolished.
- **Non-Historically Compliant Rehabilitation Alternative.** This alternative would redevelop the existing units at Rose Hill Courts but not in a way that would preserve their historic integrity. However, the Non-Historically Compliant Rehabilitation Alternative would retain the existing 100 units on the project site and would not allow for the opportunity to increase the number of affordable housing units on the project site.
- **Historic Rehabilitation Alternative.** This alternative would redevelop the existing units at Rose Hill Courts in a way that would preserve their historic integrity of the buildings. This alternative would restore the characteristics of the Garden Style design utilized in the

Rose Hill Courts development, including but not limited to low-slung buildings, large open spaces, and recreational amenities.

Discretionary Action

Following Lead Agency approval of the Initial Study, the following permits and approvals would be required prior to construction. On November 29, 2017, HACLA and the City of Los Angeles entered a Memorandum of Understanding designating HACLA as the lead agency and the City a responsible agency for the project.

Table 2
PERMITS AND APPROVALS

Agency	Permit or Approval
Housing Authority of the City of Los Angeles (HACLA)	• Approval of Disposition and Development Agreement • Discretionary approval of Relocation Plan for Residents • Certification of the EIR/EIS
City of Los Angeles	• Demolition and Building Permits • Public Benefit Project with Alternative Compliance (PUB) under Los Angeles Municipal Code Section 14.00B • Affordable Housing Density Bonus (SB 1818) as identified in LAMC Section 12.22 A.25: Request is to allow a Density Bonus project with off-menu incentives. • Lot Tie/Lot Line Adjustment Process due to Phase I and II being on separate lots. • Permit for the removal of street trees (if required) • Haul Route approval (if necessary)
United States Department of Housing and Urban Development	• NEPA Part 58 Compliance • Section 18 Demolition and Disposition of existing Rose Hill Courts • Rental Assistance Demonstration (RAD) Conversion • Adoption of the EIS

Estimated Total HUD Funded Amount: To be determined.

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]

HACLA is proposing a HUD Section 18 demolition/disposition. The developer is planning to use Project Based Section 8 vouchers and HACLA is planning to sign a Disposition and Development Agreement which is a discretionary action.

HACLA is proposing a HUD Section 18 demolition/disposition and will consider a Disposition and Development Agreement with the developer. The developer is planning to use Project Based Section 8 and Rental Assistance Demonstration Vouchers. The project may also utilize other funding sources to make it financially feasible. These potential funding sources include, but are not limited to: CDBG, HOME, LIHTC, State of California's Affordable Housing Sustainable Communities and other housing related funding sources. Specific funding sources and exact amounts will be identified at a later date.

To the extent that the project description in this EA does not change, and the circumstances under which this EA has been prepared remains the same, no additional environmental documentation pursuant to NEPA would be prepared by HCID, unless specifically requested by HUD.

Existing Conditions and Trends[3] *[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]

Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

3 IBID, Section 2.0 – Environmental Setting.

Compliance Factors	Determination and Compliance Documentation
Historic Preservation *[36 CFR Part 800]*	**Compliance steps would be invoked**. Rose Hill Courts is located at 4446 Florizel Street in the City of Los Angeles. The property consists of 100 apartments that were developed by the Los Angeles Housing Authority (HACLA) in 1942. The design team included architects William F. Ruck and Claud Beelman and landscape architect Hammond Sadler. Rose Hill Courts is also considered historically significant as one of the oldest public housing complexes in Los Angeles and exemplifies the city planning and public welfare practices of the time, which responded to the urban housing shortages and substandard living conditions in the second quarter of the twentieth century. Rose Hill Courts was officially determined eligible for listing in the National Register of Historic Places in 2003, and thus meets the definition of a "historic property" under the provisions of Section 106 of the National Historic Preservation Act. The proposed demolition of Rose Hill Courts and construction of the proposed Rose Hill Courts Redevelopment project would have an adverse effect on the significance and integrity of Rose Hill Courts. **A potentially significant impact could occur.** This issue will be further analyzed in an Environmental Impact Report/Environmental Impact Statement (EIR/EIS) to be prepared for the project.
Floodplain Management[4] [24 CFR Part 55, Executive Order 11988]	**Compliance steps would not be invoked**. The project site is in Federal Emergency Management FEMA Flood Insurance Rate Map (FIRM), Zone X, which is outside the 100-year flood zone (Panel 06037C1629F) (FEMA, 2008). FIRM Zone X containing the project site is characterized as moderate to low risk areas for FEMA flood hazard zones. Flood Zone X identifies "areas outside the one percent annual chance floodplain, areas of one percent annual chance sheet flow flooding where average depths are less than one foot, areas of one percent annual chance stream flooding where the contributing drainage area is less than one square mile, or areas protected from the one percent annual chance flood by levees." (FEMA, 2011) Therefore, the project would not place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary, FEMA FIRM, or other flood hazard delineation map. No impacts to housing or flood-flow as a result of the project are anticipated. **No impact would occur.** This issue will not be analyzed further in the EIR/EIS that will be prepared for the project.
Wetlands Protection[5] [Executive Order 11990]	**Compliance steps would not be invoked**. According to the literature review and reconnaissance-level field survey, no wetlands occur in or adjacent to the project site. For this reason, no direct or indirect impacts to federally-protected wetlands as defined by § 404 of the Clean Water Act are anticipated through

4 UltraSystems Initial Study Section 4.9 – Hydrology.
5 Ibid. Section 4.4 – Biological Resources.

Compliance Factors	Determination and Compliance Documentation
	direct removal, filling, hydrological interruption, or other means, as a result of project activities. **No impact would occur.** This issue will not be analyzed further in the EIR/EIS that will be prepared for the project.
Coastal Zone Management[6] [Sections 307(c), (d)]	**Compliance steps would not be invoked**. The project site is not located within the City's Coastal Zone. Further, the City of Los Angeles Zoning Information Map Access System (ZIMAS) determines that the assessor's parcel number for the project site is not within a coastal zone. **No impact would occur.** This issue will not be analyzed further in the EIR/EIS that will be prepared for the project.
Sole Source Aquifers[7] [40 CFR Part 149]	**Compliance steps would not be invoked**. The Environmental Protection Agency (EPA) map of designated sole source aquifers in Region 9 (which covers California Nevada, and Arizona) indicates that there are no sole source aquifers located within the City of Los Angeles. **No impact would occur.** This issue will not be analyzed further in the EIR/EIS that will be prepared for the project.
Endangered Species[8] [50 CFR Part 402]	**Compliance steps would not be invoked**. The project site is located in a highly-urbanized settings which provides low habitat value for special-status plant and wildlife species. The literature review and reconnaissance biological survey conducted in May 2018 assessed that the project site contains structures, sidewalks, multiple paved surface areas with impervious surfaces, and lacks suitable soils, biological resources, and physical features to support any candidate, sensitive, or special-status plant and animal species. Additionally, no special-status plants or wildlife were observed within the project site during any site surveys. Therefore, no direct or indirect impacts on special-status plant or animal species are anticipated as a result of the project activities. The project site does not contain habitat that supports any special status species, and no wetlands or riparian habitats are found on site. For these reasons, the project would be compatible with California Wetlands Policy, and the California Endangered Species Act. **No impact would occur.** This issue will not be analyzed further in the EIR/EIS that will be prepared for the project.
Wild and Scenic Rivers[9] [Section 7(b), (c)]	**Compliance steps would not be invoked**. According to the National Park Service, there are no wild or scenic rivers located on or near the project site. The project is located within an urbanized setting, and construction of the project would not have an effect on any of the rivers included in the National Wild and Scenic Rivers

6 City of Los Angeles Coastal Zone Map, Accessed online at: http://cityplanning.lacity.org/Code_Studies/Housing/CWCZ85x11102003.pdf. on May 30, 2018.
7 United States Environmental Protection Agency, Ground Water Sole Source Aquifer, Pacific Southwest Region 9, https://archive.epa.gov/region9/water/archive/web/html/ssa.html. Accessed: May 30, 2018.
8 UltraSystems Initial Study, Section 4.4 –Biological Resources and Section 4.10 Land Use and Planning.
9 National Park Service. 2018. Wild and Scenic Rivers Program. Accessed on May 31, 2018, at: https://www.nps.gov/orgs/1912/plan-your-visit.htm.

Compliance Factors	Determination and Compliance Documentation
	System. **No impact would occur.** This issue will not be analyzed further in the EIR/EIS that will be prepared for the project.
Air Quality[10] [Clean Air Act, Sections 176(c) and (d); 40 CFR Parts 6, 51, 93]	**Compliance steps would be invoked.** The project is located within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources to meet federal and State ambient air quality standards. It has responded to this requirement by preparing a series of Air Quality Management Plans (AQMPs). As discussed in the Rose Hill Courts Redevelopment Initial Study, Section 4.3, Air Quality, the project would demolish the existing onsite housing and construct a new housing project that would house more people than the existing project site and would also generate additional vehicle trips compared to existing conditions. **A potentially significant impact could occur** regarding air quality impacts and potential impacts to sensitive receptors. This issue will be further analyzed in an Environmental Impact Report/Environmental Impact Statement (EIR/EIS) to be prepared for the project.
Farmlands Protection[11] [7 CFR Part 658]	**Compliance steps would not be invoked**. The project site and surrounding land uses are designated by the FMMP (Department of Conservation, 2016) as "Area Not Mapped (Z)," which falls outside of the Natural Resources Conservation Service (NRCS) soil survey and not mapped by the FMMP. The project is located within an urbanized area, and all construction activities and onsite improvements would occur within an existing developed site. Therefore, no farmland would be converted to non-agricultural use. **No impact would occur.** This issue will not be analyzed further in the EIR/EIS that will be prepared for the project.
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] 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. 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. The project is not expected to result in alteration of the demographic character or socioeconomic context of the area. 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

10 Ibid. Section 4.3 – Air Quality.
11 Ibid. Section 4.2 – Agriculture and Forestry Resources.
12 City of Los Angeles, Health Atlas for the City of Los Angeles, Chapter 4: Economic Conditions, June 2013, pg. 29.

Compliance Factors	Determination and Compliance Documentation
	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.
HUD Environmental Standards	**Determination and Compliance Documentation**
Noise Abatement and Control [13] [24 CFR Part 51 Subpart B]	**Compliance steps would be invoked.** **Construction.** Per Initial Study Section 4.12, Noise, a significant impact may occur if the project would generate excess noise that would cause the ambient noise environment at the project site to exceed noise level standards set forth in the City of Los Angeles General Plan Noise Element (Noise Element) and the City of Los Angeles Noise Ordinance (Noise Ordinance). See § 111.00 through § 116.01 of the LAMC, and LAMC § 41.40. The project has the potential to generate noise during the construction phase from construction equipment. **A potentially significant impact could occur.** This issue will be further analyzed in an Environmental Impact Report/Environmental Impact Statement (EIR/EIS) to be prepared for the project. **Operation.** Upon completion and operation of the project, onsite operational noise would be generated from vehicular project traffic, including parking and noise from vehicles, as well as noise from use of outdoor areas. Additionally, noise would be created by heating, ventilation, and air conditioning (HVAC) equipment installed for the new development. However, the noise levels generated by these equipment types are not anticipated to be substantially greater than those generated by the current HVAC equipment serving the existing buildings on site and in the project vicinity. The operation of any onsite stationary sources of noise would be required to comply with the LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels. The project has the potential to generate noise and as such, construction and/or project operation has the potential to generate noise which could exceed HUD noise threshold levels of 45 A-weighted decibels (dBA) interior and 65 dBA exterior. **A potentially significant impact could occur.** This issue will be further analyzed in an Environmental Impact Report/Environmental Impact Statement (EIR/EIS) to be prepared for the project.
Toxic/Hazardous/Radioactive Materials, Contamination, Chemicals or Gases[14] [24 CFR 58.5(i)(2)]	**Compliance steps would be invoked.** The project includes the demolition of 14 existing buildings comprised of 100 residential apartments, and one administration building. As detailed in the Phase I Report conducted in April 2018 for the project site by Altec Testing & Engineering, Inc (Altec), several technical studies were conducted for the project site.

13 UltraSystems Initial Study, Section 4.12 – Noise.
14 UltraSystems Initial Study, Section 4.8 – Hazards and Hazardous Materials.

Compliance Factors	Determination and Compliance Documentation
	Altec Testing & Engineering, Inc. (Altec) was hired to perform an update to the Phase I Environmental Site Assessment (ESA) for the project site. This Phase I ESA found the following Recognized Environmental Conditions (RECs): • Potential REC – Lead in Soil. Lead has been found in soil along existing building foundations. The most protective screening level for lead in residential soil in California is 80 milligrams per kilogram (mg/kg). Any lead above applicable action levels will be remediated by trained personnel in accordance with applicable laws (see discussion below regarding HACLA Master Specification Sections 01110 and 02090). Due to the presence of lead in the soil, there could be a potential impact. **A potentially significant impact could occur**. This issue will be further analyzed in an Environmental Impact Report/Environmental Impact Statement (EIR/EIS) to be prepared for the project. • Potential REC – Indoor radon gas. There is a moderate potential for indoor radon gas levels at or exceeding the US EPA action level of 4.0 pCi/L. Due to the presence of indoor radon gas, project impacts regarding hazards and hazardous materials could be potentially significant. **A potentially significant impact could occur.** This issue will be further analyzed in an Environmental Impact Report/Environmental Impact Statement (EIR/EIS) to be prepared for the project. The Phase I ESA found the following regarding lead in drinking water. • There is a potential for the presence of lead in drinking water associated with the leaching of lead from plumbing components/water supply lines. (Altec, 2018, p. 5) Due to the presence of lead in drinking water, project impacts regarding hazards and hazardous materials could be potentially significant. **A potentially significant impact could occur**. This issue will be further analyzed in an Environmental Impact Report/Environmental Impact Statement (EIR/EIS) to be prepared for the project. Demolition of the existing onsite structures will require the remediation, removal, mitigation, or stabilization of Asbestos Containing Materials (ACMs) and Lead Based Paint (LBP) previously identified in the project buildings (Altec, 2018). Due to the presence of ACMs and LBP on the project site, the project could have a potentially significant impact. **A potentially significant impact could occur.** This issue will be further analyzed in an

Compliance Factors	Determination and Compliance Documentation
	Environmental Impact Report/Environmental Impact Statement (EIR/EIS) to be prepared for the project.
Siting of HUD-Assisted Projects near Hazardous Operations[15] [24 CFR 51 C]	**Compliance steps would not be invoked**. The project site is not located within the boundaries of a City-designated methane zone or a methane buffer zone[15]. Therefore, the potential for the presence of methane or other volatile gases at the site is considered low. The project site is not located on a hazardous waste site, superfund site, or brownfield site. The project site is not identified as clean up or disposal sites[16]**. A less than significant impact would occur.** This issue will not be analyzed further in the EIR/EIS that will be prepared for the project.
Airport Clear Zones and Accident Potential Zones Hazards [17] [24 CFR Part 51 Subpart D]	**Compliance steps would not be invoked**. The project is not located within the boundary of an Airport Influence Area or within two miles of a public airport or public use airport (Los Angeles County GIS Data Portal, 2018). For these reasons, the project would not expose people to safety hazards due to proximity to a public airport, the parcel profile report for the project site generated by the City of Los Angeles Information Mapping Map Access System (ZIMAS) indicates that the project site is not located within an airport hazard area. **No impact would occur.** This issue will not be analyzed further in the EIR/EIS that will be prepared for the project.

15 https://www.partneresi.com/resources/library/los-angeles-methane-zone-map-0. Accessed on March 31, 2018.

16 UltraSystems Initial Study, Section 4.8 – Hazards.

17 Ibid., Section 4.8 – Hazards; and City of Los Angeles ZIMAS Parcel Profile Report for the project site; and Los Angeles County GIS Data Portal, 2018. GIS Data for LA County. Accessed online at: http://egis3.lacounty.gov/dataportal/2016/03/30/airport-land-use-commission-aluc-layers/, 2015/2016. Accessed on February 20, 2018.

ENVIRONMENTAL ASSESSMENT FACTORS

[Environmental Review Guide HUD CPD 782, 24 CFR 58.40; Ref. 40 CFR 1508.8 and1508.27]

Evaluate the significance of the effects of the proposal on the character, features and resources of the project area. Enter relevant base data and verifiable source documentation to support the finding. Then enter the appropriate impact code from the following list to make a determination of impact:

Impact Codes:
(1) No impact anticipated;
(2) Potentially beneficial;
(3) Potentially adverse;
(4) Requires mitigation; and
(5) Requires project modification.

Note names, dates of contact, telephone numbers and page references. Attach additional material as appropriate. Note conditions or mitigation measures required.

Topical Area	Code	Source or Determination
LAND USE		
Conformance with Comprehensive Plans and Zoning[18]	**3**	The project is located within the Northeast Los Angeles Community area of the City of Los Angeles. As such, the City of Los Angeles Municipal Code, General Plan, Citywide Design Guidelines, and the Northeast Los Angeles Community Plan would guide development of the project. The project site is designated as Low Medium I by the Northeast Community Plan. The site is zoned for residential uses with a zoning designation of [Q]R1-1D. The "[Q]" represents a permanent [Q] Qualified Classification that establishes development standards relating to infrastructure, building design, retaining walls, landscaping, and environmental considerations. The "D" represents a "D" Development Limitation that limits building height and floor area ratio (FAR). The project would alter building coverage on the lot and would increase the number of residents on the project site compared to existing conditions. The project site has a current zoning designation for single-family residential development, however the project proposes multi-family development and will require Public Benefits Project Alternative Compliance approval under LAMC Section 14.00.B. **A potentially significant impact could occur.** This issue will be further analyzed in an Environmental Impact Report/Environmental Impact Statement (EIR/EIS) to be prepared for the project.
Compatibility and Urban Design[19]	**3**	Development of the project would demolish historic buildings on site. **A potentially significant impact could occur.** This issue

18 Ibid. Section 4.10 – Land Use and Planning.
19 Ibid. Section 4.1 – Aesthetics.

Topical Area	Code	Source or Determination
		will be further analyzed in an Environmental Impact Report/Environmental Impact Statement (EIR/EIS) to be prepared for the project.
Slope[20]	**1**	Topography within the project site is relatively flat. The site slopes to the southeast at a gradient flatter than 5:1 (H:V). The site is located within a City of Los Angeles Hillside Grading Area and a Hillside Ordinance Area. However, the site is not located within an area identified as having a potential for seismic slope instability by the state of California. There are no known landslides near the site, nor is the site in the path of any known or potential landslides. Therefore, the probability of slope stability hazards affecting the site is considered very low. **Less than significant impacts would occur.** This will not be analyzed further in the EIR/EIS that will be prepared for the project.
Erosion[21]	**3**	The project site has a low potential for soil erosion because it is relatively flat and is considered urban land where almost 90 percent of the surface has been covered by asphalt, concrete, buildings, and other structures. The proposed project would alter the existing ground cover, and drainage patterns would be modified with development of the project. **A potentially significant impact could occur.** This issue will be further analyzed in an Environmental Impact Report/Environmental Impact Statement (EIR/EIS) that will be prepared for the project.
Slope Suitability[22]	**1**	Topography within the project site is relatively flat. The site slopes to the southeast at a gradient flatter than 5:1 (H:V). The site is located within a City of Los Angeles Hillside Grading Area and a Hillside Ordinance Area. However, the site is not located within an area identified as having a potential for seismic slope instability by the state of California. There are no known landslides near the site, nor is the site in the path of any known or potential landslides. Therefore, the probability of slope stability hazards affecting the site is considered very low. **Less than significant impacts would occur**. This will not be analyzed further in the EIR/EIS that will be prepared for the project.
Hazards and Nuisances including Site Safety	**4**	Refer to the Toxic/Hazardous/Radioactive Materials, Contamination, Chemicals or Gases discussion above. According to the Phase I ESA, there are Potential Recognized Environmental Conditions (REC) in the following areas: (1) lead in soil; (2) lead in drinking water. Additionally, potential impacts would occur from indoor radon gas, LBP and ACMs. **A potentially significant impact could occur.** This issue will be further analyzed in an Environmental Impact Report/Environmental Impact Statement (EIR/EIS) to be prepared for the project.

20 Ibid. Appendix C – Geotechnical Investigation.
21 Ibid.
22 Ibid.

Topical Area	Code	Source or Determination
Energy Consumption[23]	**3**	Public Resources Code section 21000(b)(3) states that an Environmental Impact Report (EIR) must discuss "mitigation measures proposed to minimize significant effects on the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy." Section 15126.4(a)(1)(C) of the CEQA Guidelines provides that: "energy conservation measures, as well as other appropriate mitigation measures, shall be discussed when relevant." Appendix F of the CEQA Guidelines provides a list of possible energy impacts and potential conservation measures that are intended to assist the lead agency in preparation of an EIR. (Perkinscoie, 2018) The analysis in the EIR/EIS to be prepared for the project is required under CEQA Appendix F to calculate the project's energy use attributable to project-generated vehicle trips, and to also calculate the project's energy consumption during construction and operational phases. **A potentially significant impact could occur**. This issue will be further analyzed in an Environmental Impact Report/Environmental Impact Statement (EIR/EIS) to be prepared for the project.
Noise – Contribution to Community Noise Levels[24]	**3**	The construction activities associated with the project could have an adverse impact on both sensitive structures (i.e., building damage) and populations (i.e., annoyance). A significant impact may occur if the project would generate excess noise that would cause the ambient noise environment at the project site to exceed noise level standards set forth in the City of Los Angeles General Plan Noise Element (Noise Element) and the City of Los Angeles Noise Ordinance (Noise Ordinance). See § 111.00 through § 116.01 of the LAMC, and LAMC § 41.40. The project has the potential to generate noise both during the construction phase (from construction equipment) and the operational phase (from persons residing at the project site and from vehicular traffic generated by the project). **A potentially significant impact could occur.** This issue will be further analyzed in an Environmental Impact Report/Environmental Impact Statement (EIR/EIS) to be prepared for the project.
Air Quality Effects of Ambient Air Quality on Project and Contribution to Community Pollution Levels[25]	**3**	The project would demolish the existing onsite housing and construct a new housing project that would house more people than the existing project site and would also generate additional vehicle trips compared to existing conditions. A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. Land uses that are considered more sensitive to changes in air quality than others are referred to as sensitive receptors. Land uses such as primary and secondary schools, hospitals, and

23 Ibid. Section 4.19 – Mandatory Findings of Significance.
24 Ibid. Section 4.12 – Noise.
25 Ibid. Section 4.3 – Air Quality.

Topical Area	Code	Source or Determination
		convalescent homes are considered to be sensitive to poor air quality because the very young, the old, and the infirm are more susceptible to respiratory infections and other air quality-related health problems than the general public. Residential uses are considered sensitive because people in residential areas are often at home for extended periods of time, so they could be exposed to pollutants for extended periods. The project has the potential to impact sensitive receptors. **A potentially significant impact could occur.** This issue will be further analyzed in an Environmental Impact Report/Environmental Impact Statement (EIR/EIS) to be prepared for the project.
Environmental Design Visual Quality – Coherence, Diversity, Compatible Use and Scale[26]	**3**	The project site is located in the Rose Hill Courts neighborhood, in the northeastern part of City of Los Angeles, which is characterized by hilly topography and dense urban development. Dominant natural visual resources in the project vicinity include scenic vistas of numerous hillsides, natural open space and park lands, including the Ernest Debs Regional Park and Rose Hill Park to the north and Rose Hill Recreation Center to the south. The project would alter building coverage on the lot and would increase the number of residents on the project site compared to existing conditions. Under the project, existing buildings and landscaping on site would be demolished and replaced with new multi-family residential buildings, a property management and maintenance office and landscaping. There are no views available through the project site due to the existing buildings, landscaping and trees on site. Development of the project would not have the potential to block views because no scenic views are afforded on or near the project site. Distant views of hills to the southeast from McKenzie and Florizel would remain. According to Caltrans, the closest officially designated scenic highway is State Route 110 (Arroyo Seco Historic Parkway) located approximately one mile to the east of the project site.[27] The Arroyo Seco Parkway is an officially designated National Scenic Byway, California State Scenic Highway and Historic Parkway. Therefore, the project site is not located along a state scenic highway and as such, the project would have no impact in this regard. Development of the project would demolish historic buildings on site which would change the visual character of the project site. **A potentially significant impact could occur.** This issue will be

26 Ibid. Section 4.1 – Aesthetics.

27 Caltrans, 2015. Caltrans GIS Data: Eligible and Officially Designated Scenic Highways. The Department of Transportation (Caltrans), Sacramento, California. Accessed: February 20, 2018 at: http://www.dot.ca.gov/hq/tsip/gis/datalibrary/Metadata/ScenicHwys.html.

Topical Area	Code	Source or Determination
		further analyzed in an Environmental Impact Report/Environmental Impact Statement (EIR/EIS) to be prepared for the project.
SOCIOECONOMIC		
Demographic Character Changes[28]	**2**	All 191 dwelling units would be reserved as restricted affordable units. This increase in housing, specifically as it relates to affordable housing, is consistent with City of Los Angeles and Southern California Association of Governments (SCAG) growth projections and would not result in any significant impacts associated with substantial growth. The project would not result in changes to the community's demographic character. The project is not expected to result in any gentrification of the area. Further, the project is expected to create a positive impact by promoting the City of Los Angeles' goal of increasing the supply of affordable housing within the City. **A beneficial impact is expected to occur.**
Displacement[29]	**3**	The existing housing units would be demolished under the project, and some of the existing residents would temporarily be displaced. **A potentially significant impact could occur.** This issue will be further analyzed in an Environmental Impact Report/Environmental Impact Statement (EIR/EIS) to be prepared for the project.
Employment and Income Patterns[30]	**2**	The project would develop 191 dwelling units reserved for low-income families earning between 30 to 50 percent of the area median income. The project supports the City's goal of increasing affordable housing within the City of Los Angeles. The project would continue to provide housing stock and housing options for low-income residents within the Northeast Los Angeles Community area, and the project would continue to provide housing near employment opportunities. **A beneficial impact is expected to occur.**
COMMUNITY FACILITIES AND SERVICES [31, 32]		
Educational and Cultural Facilities	**1**	The project would generate 282 permanent residents in the first phase of development and 350 permanent residents in the second phase of development (Related, 2018), resulting in a total of 632 residents, which is 412 more residents, compared to existing (August 2018) conditions. Implementation of the project has the potential add students to the LAUSD's school facilities because the project would add additional dwelling units that could result in additional students residing at the project site. The project would be required to pay all applicable school impact fees to the Los Angeles Unified School

28 Ibid. Section 4.13 – Population and Housing.
29 Ibid. Section 4.13 – Population and Housing.
30 Ibid. Section 4.10 – Land Use and Planning.
31 Ibid. Section 4.13 – Population and Housing.
32 Ibid. Section 4.14 – Public Services.

Topical Area	Code	Source or Determination
		District. Therefore, potential impacts to schools would be less than significant. **Less than significant impacts would occur.** This will not be analyzed further in the EIR/EIS that will be prepared for the project.
Commercial Facilities	**2**	Development of the project would not hinder existing commercial facilities in the area. The project would continue to support existing commercial facilities by keeping residents to the area, adding units which would increase the number of persons living at the project site, and in turn, these residents could be potential customers and employees. **A beneficial impact is expected to occur.**
Health Care	**1**	As detailed in the City of Los Angeles General Plan EIR, County of Los Angeles and private healthcare facilities are responsible for providing a wide range of health services to the population of the City of Los Angeles. When the City's General Plan EIR was written, there were 70 health care facilities within the City of Los Angeles.[33] The four emergency services provided by hospitals throughout the City of Los Angeles include: 1) comprehensive care; 2) basic care; 3) standby care; and 4) no care, where the facility provides no in-house physician and a patient must arrive with a physician lined up.[34] The nearest major hospitals to the project site are as follows: 1) Keck Hospital of University of Southern California, located at 1500 San Pablo Street in Los Angeles, approximately 2.4 miles southwest of the project site; 2) Children's Hospital Los Angeles, located at 4650 Sunset Boulevard in Los Angeles, approximately 10.5 miles northwest of the project site; and 3) Martin Luther King Jr. Community Hospital, located at 1680 E 120th Street in Los Angeles, approximately 19 miles southwest of the project site. The project is anticipated to generate a net increase of 412 persons, compared to the current (August 2018) population living at the project site. This increase in persons represents a de minimis impact to existing nearby healthcare facilities. **No impact would occur.** This issue will not be analyzed further in the EIR/EIS that will be prepared for the project
Social Services	**1**	The project would continue to comply with applicable required taxes and fees to manage public resources including, but not limited to schools. Therefore, the project would not exacerbate demand on any social services in the project area or the City of Los Angeles. **No impact would occur**. This issue will not be analyzed further in the EIR/EIS that will be prepared for the project.

33 City of Los Angeles General Plan EIR. P. 2.16-1. Accessed online on June 3, 2018 at: http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF_DraftEIR/GPF_FEIR_DEIR2.16.pdf.

34 Ibid. page 2.16-3.

Topical Area	Code	Source or Determination
Solid Waste[35]	**1**	LA Sanitation (LASAN) is responsible for the collection and removal of all solid materials and waste in the City of Los Angeles. LA Sanitation (LASAN) is responsible for the collection and removal of all solid materials and waste in the City of Los Angeles. The City collects an average of 6,652 tons per day of refuse, recyclables, yard trimmings, horse manure and bulky items from more than 750,000 homes. Per the City of Los Angeles LA Sanitation website, trash service is currently provided to the project site by LA Sanitation on Mondays.[36] LASAN has over 500 collection vehicles. The total permitted capacity of the landfill facilities used by the City of Los Angeles is approximately 63,400 tons per day with annual daily throughput of approximately 41,700 tons per day. Sufficient landfill capacity is available to meet the City demand for years to come.[37] Since sufficient permitted landfill capacity exists to support occupancy of the project, no adverse impact to either solid waste collection service or the landfill disposal system would occur. **A less than significant impact would occur.** This issue will not be analyzed further in the EIR/EIS that will be prepared for the project.
Waste Water[38]	**1**	The project includes the development of sewer lines to provide an adequate wastewater flow from the project site. The project would comply with applicable requirements of the City of Los Angeles Department of Public Works such that the project would provide adequate infrastructure for wastewater flows from the project site. The volume of wastewater generated by the project represents only a fraction (approximately .0040 percent) of the existing daily capacity of the wastewater treatment facility providing service in the area. Therefore, the project would be within the existing capacity of the wastewater treatment provider. **No impact would occur**. This issue will not be analyzed further in the EIR/EIS that will be prepared for the project.
Stormwater[39]	**1**	The project would result in a 19 percent decrease in the amount of landscaped area on the project site, compared to existing conditions. Overall, impervious surfaces cover approximately 49 percent of the existing project site. With the project, the total area of impervious surfaces would be increased to 68 percent, which is a 19 percent increase in impervious surfaces. The existing site conditions and drainage infrastructure includes: one (1) curb catch basin along Florizel Street (some 100 feet west of Mackenzie Avenue); two (2) catch basins along the driveway

35 Ibid. Section 4.18 – Utilities and Service Systems.
36 LA Sanitation Residential Collection, 2018. Website accessed on July 20, 2018 at http://neighborhoodinfo.lacity.org/index.cfm?streetAddress=4446%20florizel%20street.
37 HDR Engineering, Inc., 2014. City of Los Angeles Solid Waste Integrated Resources Plan Final EIR, p. 4.13-8, December Accessed on February 13, 2018 at: http://www.zerowaste.lacity.org/pdf/SWIRP%20Final%20PEIR%20Dec2014.pdf.
38 Ibid. Section 4.18 – Utilities and Service Systems.
39 Ibid. Section 4.18 – Utilities and Service Systems.

Topical Area	Code	Source or Determination
		(at Mackenzie Avenue), and two (2) curb catch basins at the site's southeast corner (along Mercury Avenue and Mackenzie Avenue). The proposed project grading/drainage design intends to re-use these existing catch basin features and/or possibly replace with new basin structures in similar locations. The existing site's general drainage pattern (from northwest to southeast) will not change with the new onsite improvements, and therefore, the existing street drainage scheme will not be significantly altered. The project's onsite improvements would include LID/SUSMP BMPs for "store & re-use" that will retain and treat the 85th percentile 24-hour runoff event onsite. It is estimated that the project's post development storm water run-off flowing into drainage infrastructure would be less than the current/exiting conditions. The project would be required to infiltrate, evapotranspire, store for use, and/or treat through a high removal efficiency biofiltration/biotreatment system, without any stormwater runoff leaving the site to the maximum extent feasible. The proposed project would be designed in compliance with all applicable City of Los Angeles regulations regarding stormwater runoff and the project would be reviewed by the City of Los Angeles Department of Public Works to ensure that the development would not create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff. The project applicant is responsible for providing the necessary storm drain infrastructure to serve the proposed project as well as any necessary extensions to the existing storm drain system in the project area. Thus, the project would have less than significant impact regarding exceedance of storm drain system capacity or the generation of polluted runoff. The City of Los Angeles Bureau of Engineering would review the project during the final plan check stage and prior to project approval, the Bureau would ensure that the storm drain system has adequate capacity to handle potential runoff from the project site. Related, the project developer, would provide the necessary storm drain infrastructure to serve the project site, including any required connections to the existing storm drain system. Additionally, the project would be required to implement best management practices (BMPs) in compliance with the City of Los Angeles' low impact development (LID) Ordinance to ensure that stormwater flows from the project site would not increase compared to existing conditions. **A less than significant impact would occur**. This issue will not be analyzed further in the EIR/EIS that will be prepared for the project.

Topical Area	Code	Source or Determination
Water Supply[40]	**1**	The City's LADWP manages the water supply for Los Angeles. LADWP's goal is to ensure that the City's water quality and demand are met by available water supplies. The primary sources of water supply for the City of Los Angeles are the Los Angeles Aqueducts, local groundwater, recycled water and supplemental water purchased from the Metropolitan Water District of Southern California (MWD). Water from the MWD is delivered through the Colorado River Aqueduct and the State Water Project's California Aqueduct. LADWP is a member agency that relies on imported water from MWD. For the five fiscal years ending June 30, 2015, L.A.'s water purchases from MWD averaged 280 million gallons per day (mgd) (approximately 314,000 acre-feet per year), which constituted approximately 57 percent of the LADWP's total water supply. (Los Angeles Department of Water & Power 2013a). The quantities of water obtained from these sources vary from year to year and are dependent on weather conditions and water demand. The project's net increase in water demand of 14,833 gpd (16.62 acre-feet per year) is approximately .008 percent[41] of the UWMP's projected demand for multi-family housing at project buildout (2025). Therefore, the project would comprise a de minimis demand compared to the anticipated demand or multifamily housing. As such, population growth and an increase in water demand for the project is captured by the UWMP's forecasts for increased water demand between 2015 and 2040. The UWMP found that with its current water supplies, planned future water supplies and water conservation, LADWP will be able to reliably provide water to its customers through 2040. Sufficient water supplies are available to meet all demand within the City's service area through all hydrologic cycles during the term of the latest UWMP. **A less than significant impact would occur.** This issue will not be analyzed further in the EIR/EIS that will be prepared for the project.
Public Safety - Police, Fire and Emergency Medical[42]	**3**	Implementation of the project has the potential to adversely affect the City's existing fire/emergency medical and police protection service because the project would add additional dwelling units and persons to the project site. **A potentially significant impact could occur.** This issue will be further analyzed in an Environmental Impact Report/Environmental Impact Statement (EIR/EIS) to be prepared for the project.

40 Ibid. Section 4.18 – Utilities and Service Systems.

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

42 UltraSystems Initial Study, Section 4.14 – Public Services.

Topical Area	Code	Source or Determination
Open Space and Recreation[43]	3	Due to the increased population generated from the proposed project, it is anticipated that the project could have a potentially significant impact to parks and recreational facilities. **A potentially significant impact could occur.** This issue will be further analyzed in an Environmental Impact Report/Environmental Impact Statement (EIR/EIS) to be prepared for the project.
Transportation[44]	3	During the construction period, the project would generate temporary construction-related truck and automobile traffic. Traffic during the construction phase would include construction workers traveling to and from the project site, trucks hauling construction materials to the site, and transporting material away from the site. Additionally, the project would generate vehicle trips from project operations. **A potentially significant impact could occur.** This issue will be further analyzed in an Environmental Impact Report/Environmental Impact Statement (EIR/EIS) to be prepared for the project.
NATURAL FEATURES		
Water Resources[45]	1	Development of the project would not substantially modify the amount of groundwater infiltration and recharge on the project site. The project would not substantially deplete groundwater supplies or result in a substantial net deficit in the aquifer volume or lowering of the local groundwater table. **A less than significant impact would occur.** This issue will not be analyzed further in the EIR/EIS that will be prepared for the project.
Surface Water	1	The U.S. Fish and Wildlife Service indicates that there are no wild or scenic rivers that run through or near the project site. No surface water exists in the immediate project vicinity. **No impact would occur.** This issue will not be analyzed further in the EIR/EIS that will be prepared for the project.
Unique Natural Features and Agricultural Lands[46]	1	The project site and surrounding land uses are designated by the FMMP (Department of Conservation, 2016) as "Area Not Mapped (Z)," which falls outside of the Natural Resources Conservation Service (NRCS) soil survey and not mapped by the FMMP. The project is located within an urbanized area, and all construction activities and onsite improvements would occur within an existing developed site. Therefore, no farmland would be converted to non-agricultural use. **No impact would occur.** This issue will not be analyzed further in the EIR/EIS that will be prepared for the project.
Vegetation, Wildlife[47]	1	The project site is located in a highly-urbanized setting which provides low habitat value for special-status plant and wildlife species. The literature review and reconnaissance biological

43 UltraSystems Initial Study, Section 4.15 –Recreation.
44 Ibid. Section 4.16 – Transportation and Traffic.
45 Ibid. Section 4.9 – Hydrology and Water Resources.
46 Ibid. Section 4.2 – Agriculture and Forestry Resources.
47 UltraSystems Environmental. Initial Study, Section 4.4 – Biological Resources.

Topical Area	Code	Source or Determination
		survey conducted in May 2018 assessed that the project site contains structures, sidewalks, multiple paved surface areas with impervious surfaces, and lacks suitable soils, biological resources, and physical features to support any candidate, sensitive, or special-status plant and animal species. Additionally, no special-status plants or wildlife were observed within the project site during any site surveys. Therefore, no direct or indirect impacts on special-status plant or animal species are anticipated as a result of the project activities. **No impact would occur.** This issue will not be analyzed further in the EIR/EIS that will be prepared for the project.
OTHER FACTORS		
Flood Disaster Protection Act[48] [§58.6(a)]	**1**	As discussed above, the project site is located in an area designated as Zone X by the Federal Emergency Management System (Map Number 0601371629F), which signifies that the project is outside of a 100-year flood zone. **No impact would occur.** This issue will not be analyzed further in the EIR/EIS that will be prepared for the project.
Coastal Barrier Resources Act/Improvement Act[49] [§58.6(c)]	**1**	As detailed on the Coastal Barrier Resources System Map, coastal barriers exist along the East Coast, Gulf of Mexico, and along the Great Lakes. No designated coastal barriers exist along the West Coast. **No impact would occur.** This issue will not be analyzed further in the EIR/EIS that will be prepared for the project.
Airport Runway Clear Zone or Clear Zone Disclosure[50] [§58.6(d)]	**1**	The project is not located within the boundary of an Airport Influence Area, or within two miles of a public airport or public use airport (Los Angeles County GIS Data Portal, 2018). For these reasons, the project would not expose people to safety hazards due to proximity to a public airport. **No impact would occur.** This issue will not be analyzed further in the EIR/EIS that will be prepared for the project.
Other Factors	**1**	The project is located within a fully developed area within the Northeast Los Angeles Community Plan area in the City of Los Angeles. The project is consistent with the City of Los Angeles' goals of increasing the housing stock and providing low-income housing in the City. There are no other factors associated with the project that have not already been addressed in the analysis above. **No impact would occur.** This issue will not be analyzed further in the EIR/EIS that will be prepared for the project.

Summary of Findings and Conclusions:

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, in the Montecito Heights neighborhood area of the City of Los Angeles. The project involves redevelopment of Rose Hill Courts,

48 Ibid. Section 4.9 – Hydrology and Water Quality.

49 United States Fish and Wildlife Service, Coastal Barrier Resources System. https://www.fws.gov/ecological-services/habitat-conservation/coastal.html. Accessed on May 30, 2018.

50 UltraSystems Environmental. Initial Study, Section 4.8 – Hazards.

which consists of demolition of 100 existing units and 1 administration building and the construction of 191 affordable housing units to be developed in two phases.

Construction improvements are expected to occur in two phases. Construction for each phase is expected to be completed within a 18-24-month time frame. During Phase I 94 units would be constructed and during Phase II 97 units would be constructed. Opening years for the two phases are estimated to be: 2022 for Phase I and 2025 for Phase II. Residents would need to be temporarily re-located during project construction and would be able to return to the project site upon completion of Phase I.

As detailed in this Environmental Assessment as well as the Initial Study prepared for the project, the project would have less than significant impacts regarding agriculture and forestry resources, hydrology and water quality, mineral resources, and utilities and service systems.

Development of the project has the potential to produce or result in adverse impacts to aesthetics, air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, land use and planning, noise, population and housing, public services, recreation, transportation and traffic, and tribal cultural resources. Based on this Environmental Assessment, the project has the potential to result in adverse impacts to the natural environment or impair quality of the human environment. The project will be further analyzed in an EIR/EIS to be prepared for the project.

Alternatives to the Proposed Actions:

Alternative and Project Modifications Considered *[24 CFR 58.40(e), Ref. 40 CFR 1508.9] Identify other reasonable courses of action that were considered and not selected, such as other sites, design modifications, or other uses of the subject site. Describe the benefits and adverse impacts of each alternative and reasons for its rejection.*

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

No Action Alternative *[24 CFR 58.40(e)] Discuss the benefits and adverse impacts to the human environment of not implementing the preferred alternative.*

As detailed in Section 3.0 of the Initial Study, this alternative would involve the continuation of uses on the site; therefore, existing buildings and tenants would remain at the project site and no new buildings or uses would be constructed or demolished. The Rose Hill Courts complex would remain the same. The adverse impacts to the human environment would be that without adequate maintenance, the existing buildings (interiors and exteriors) would continue to deteriorate, including termite damaged buildings, due to their age.

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

Historic Rehabilitation Alternative
This alternative would redevelop the existing units at Rose Hill Courts in a way that would preserve their historic integrity of the buildings. This alternative would restore the characteristics of the Garden Style design utilized in the Rose Hill Courts development, including but not limited to low-slung buildings, large open spaces, and recreational amenities.

Mitigation Measures Recommended: [24 CFR 58.40(d), 40 CFR 1508.20] *Recommend feasible ways in which the proposal or its external factors should be modified in order to minimize adverse environmental impacts and restore or enhance environmental quality.*

No mitigation measures are recommended in the IS or this EA because the project will be further analyzed in the EIR/EIS to be prepared for the project and mitigation measures, as applicable, will be provided in the EIR/EIS, if warranted.

Mandatory Findings of Significance
The conditions outlined in this document which are not already required by law shall be required as condition(s) of approval by the decision-making body except as noted on the face page of this document. It is concluded that no significant impacts are apparent which might result from this project's implementation. The potential impacts of the project will be analyzed in the EIR/EIS to be prepared for the project.

Additional Studies Performed:

- Environmental Site Assessment: Altec, Phase I Environmental Site Assessment, April 20, 2018.
- Geotechnical Report: Geocon West, Inc., Geotechnical Investigation, Proposed Multi-Family Residential Structures Rose Hill Courts Redevelopment, May 16, 2018.
- Historical Report: GPA, Historical Resource Report for Rose Hill Courts, September 30, 2016.
- Limited Lead Testing: Altec, Limited Lead Testing for Rose Hills Courts, June 7, 2016 and December 5, 2016.
- Limited Asbestos Sampling: Altec, Limited Lead Testing for Rose Hills Courts, June 7, 2016.
- Tree Inventory Report: Jan C. Scow, Consulting Arborists, LLC, December 27, 2016.

List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]**:**
Reference footnotes herein and **Section 5.0 – References** within the Initial Study.

List of Permits Obtained:

Currently the project applicant Related has not obtained any permits. Refer to **Table 2** above which lists the permits and approvals being sought by the project applicant for the project.

Public Outreach [24 CFR 50.23 & 58.43]:

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

YEAR 2014.
HACLA conducted five meetings with the Rose Hill Courts Resident Advisory Committee (RAC) and tenants from May through November 2014. At these meetings, tenants were informed about the existing physical conditions, the extent of termite damage onsite, and progress updates and steps HACLA had been taking.[51]. From a health and safety standpoint, HACLA informed the residents that it would take the following steps and procedures, including: (1) monitoring and treating (as necessary), all occupied units and buildings; and (2) vacant and damaged units deemed uninhabitable would not be leased out. Only 10 units were considered uninhabitable, due to extensive termite damage. If the modernization option (see below) were chosen, these units would be improved so that they could be occupied.

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

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

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

Resident Feedback and Comments. Although all the residents were invited, tenant participation ranged from 30 to 35 residents at the initial RAC meeting, with a smaller group of 10-13 residents participating at the latter two meetings. Tenants were generally supportive of HACLA efforts and believed that the site was in dire need of improvements. Many residents voiced support for tearing down and rebuilding the entire complex. Tenants had questions about relocation; specifically, how and where they might be relocated, and whether any assistance will be provided. Long-tenured senior residents expressed their interest in continuing to remain within the neighborhood during relocation. Some residents asked about how this might affect families, especially those with children in local schools. Others were worried about leaving and not being able to return once the construction work was finished at the complex.

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

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

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

YEAR 2015

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

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

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

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

YEAR 2016

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

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

Another design charrette was held on June 29, 2016. This meeting had 55 residents and community members in attendance. The meeting was an opportunity to receive feedback on the preliminary site plan. Many of the comments received reiterated the previous feedback that HACLA obtained during its January 2016 design charrette meeting.

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

YEAR 2017

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

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

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

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

YEAR 2018

Stakeholder Feedback for New Construction Concept Plan

The year began with a design charrette that gave residents a first look at the proposed new construction concept and provided a forum for residents to give feedback. The meeting was hosted by Related and HACLA along with lead architect, Withee Malcolm. Withee Malcom presented an overview of the proposed redevelopment by using a 3D flythrough video to communicate the scale and context of the project's vision. Residents were then broken out into six groups, each led by a

facilitator, to discuss their specific likes and dislikes and to provide suggestions regarding the project's architectural direction and preliminary conceptual site plan.

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

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

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

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

Cumulative Impact Analysis [24 CFR 58.32]:

Other projects may be constructed in the project vicinity. The cumulative impacts to which the project would contribute will be analyzed in the EIR/EIS to be prepared for the project. **Potential impacts of the project could be cumulatively considerable.** This will be further addressed in the EIR/EIS to be prepared for the project.