

MEMORANDUM

TO: Northlake Associates, LLC

CC:

FROM: Raman Gaur

Vice President/ Project Director

DATE: July 12, 2022 - Revised: October 14, 2024

RE: Partial Creek Avoidance Alternative (PCAA)

PARTIAL CREEK AVOIDANCE ALTERNATIVE

Background: The Applicant originally proposed the phased development of up to 3,150 residential units, 9.2 acres of commercial uses, 13.9 acres of industrial uses, 799.5 acres of parks and open space, a 22.9-acre school site and a 1.4-acre pad for a future fire station (Project) within the area of the previously approved Northlake Specific Plan (Project Site). Subsequent to the publication of the Final Supplemental Environmental Impact Report (SEIR), the County of Los Angeles Regional Planning Commission requested that the Applicant include an affordable housing component in the Project. The Applicant made minor revisions to the Project to include an affordable component. Specifically, the Applicant eliminated 108,283 square feet (SF) of industrial use (all of the industrial uses) and 13,197 SF of commercial uses (leaving 38,700 SF of commercial uses) and reallocated 315 units from the Phase 2 area of the Project to the Phase 1 area. All 315 reallocated units are affordable units. The Regional Planning Commission approved the Northlake Project on April 18, 2018, and the Los Angeles County Board of Supervisors approved the Project on April 2, 2019 (the Project).

On January 11, 2021, the Los Angeles Superior Court ruled (Court Ruling) on the Center for Biological Diversity and Endangered Habitats League v. County of Los Angeles, et al, and Real Parties in Interest, Northlake Associates, et al, Case No.

19STCPO1610, finding that the analysis of project alternatives in the SEIR was deficient in failing to adequately study a creek avoidance alternative.

Creek Avoidance Alternative: A Creek Avoidance Alternative (CAA) Assessment was prepared and presented by the Applicant and technical consultants for the Northlake project to the Regional Planning Director, Amy Bodek, and her staff on July 29, 2021. The assessment concluded that due primarily to geotechnical reasonings, completely avoiding the creek was not a feasible alternative. Regional Planning took that conclusion under advisement and stated that the assessment would be forwarded to the Department of Public Works for further review. During this meeting the Planning Director requested that the Applicant team assess an additional alternative that, while not fully avoiding the creek, could reduce the development's impacts to the creek.

Partial Creek Avoidance Alternative: Based on the above request, the Applicant team analyzed and prepared an alternative that reduces some of the impacts to Grasshopper Creek (Creek) — a partial creek avoidance alternative — but still maintains the majority of the Project's design and features. This alternative reflects the fact that the existing landslides within the Project Site, especially the numerous landslides that toe out under the creek within Phase 1 of the Project, will most likely result in the loss of the Creek, once disturbed. As such, due to engineering geologic / geotechnical adversities that would develop as a result of implementing the CAA approach, development of the CAA would result in unacceptable increases in risk of future slope failures/landslides and, as a result, would not be feasible.

This alternative leaves Phase 1 as previously approved but reduces the scope of the Phase 2 development of the Project (see attached Exhibit).

The reduced Phase 2 area design (Partial Creek Avoidance Alternative, PCAA) avoids a cluster of smaller and larger landslides in the northern portion of the Phase 2 area. This is proposed to avoid disturbing the landslides and risk additional loss of Creek area (similar to the issues with the CAA). This alternative design would preserve both the Creek and sensitive habitat within the upper portion of the Phase 2 area of the Project Site.

This alternative provides a balanced site within the proposed Phase 2 grading footprint and does not require any additional import or export of soil, while reducing the total disturbed area in Phase 2 by 60%, thereby creating additional undisturbed open space. It also reduces the impacts to that portion of the Creek on the Project Site by approximately 20%.

Furthermore, this alternative greatly reduces the raw earthwork of Phase 2 by approximately 10 million cubic yards.

The alternate design maintains the Project unit count of 3,150. The alternative design preserves the agreed affordable component of 315 units, mixed use and live work units, and preserves the school and fire station sites, commercial sites, and the sports park, all of which were provided in the Project and remain unchanged in this alternate design.

Benefits of the Partial Creek Avoidance Alternative

- The portion of the Creek that will be saved in Phase 2 is contiguous of the upstream offsite tributary, and therefore this alternative preserves more undisturbed stream.
- The Project Site can be graded for better balance, since Phase 2 is mostly cut, while Phase 1 is fill.
- Reducing Phase 2 would promote saving of more sensitive habitat in those areas that will be undisturbed where sensitive habitat is present.
- Reducing Phase 2 will better assist wildlife movement with the upper wildlife crossing, and does not affect the secondary access and Project circulation.
- Reducing the scale of Phase 2 would promote a better fire break from the northern denser vegetation.

Rejection of the Partial Creek Avoidance Alternative

• Although the Partial Creek Avoidance Alternative would have similar impacts for each environmental topic when compared to the previously approved Project, it would not provide active recreational area to the same extent as the previously approved Project as the alternative provides 22 percent less active recreation area. (Specific Plan Policy IV. Open Space/Recreation Area, Goal i: To improve opportunities for a variety of outdoor recreational experiences.)

