DRAFT INITIAL STUDY/
MITIGATED NEGATIVE DECLARATION

LINC HOUSING

WILLOWBROOK III PROJECT

12611, 12617, AND 12625 S. WILLOWBROOK AVENUE,
COMPTON, CA 90222

Lead Agency

Los Angeles County
Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

December 2021

TABLE OF CONTENTS

Environmental Checklist Form (Initial Study) **1**

Environmental Factors Potentially Affected: **3**

Project Description **5**

A. PROJECT LOCATION 5
B. PROPOSED DEVELOPMENT 13
C. ENTITLEMENT REQUESTS 27

Environmental Impact Analysis **28**

1. AESTHETICS 28
2. AGRICULTURE / FOREST 32
3. AIR QUALITY 34
4. BIOLOGICAL RESOURCES 40
5. CULTURAL RESOURCES 44
6. ENERGY 47
7. GEOLOGY AND SOILS 49
8. GREENHOUSE GAS EMISSIONS 53
9. HAZARDS AND HAZARDOUS MATERIALS 62
10. HYDROLOGY AND WATER QUALITY 66
11. LAND USE AND PLANNING 72
12. MINERAL RESOURCES 77
13. NOISE 78
14. POPULATION AND HOUSING 88
15. PUBLIC SERVICES 90
16. RECREATION 95
17. TRANSPORTATION 97
18. TRIBAL CULTURAL RESOURCES 99
19. UTILITIES AND SERVICE SYSTEMS 103
20. WILDFIRE 110
21. MANDATORY FINDINGS OF SIGNIFICANCE 112

Preparers of the Initial Study **124**

References **125**

Acronyms and Abbreviations **128**

Mitigation Monitoring and Reporting Program (MMRP) **134**

LIST OF FIGURES:

Figure 1 Project Location Map 6
Figure 2 Aerial Photograph of the Project Site 8
Figure 3 Photographs of the Project Site 9
Figure 4 Zoning and Land Use Designations 10
Figure 5 Photographs of Surrounding Land Uses 12
Figure 6 Site Plan 14
Figure 7 First Floor Plan 15
Figure 8 Second Floor Plan 16
Figure 9 Third Floor Plan 17
Figure 10 Roof Plan 18
Figure 11 Elevations 19
Figure 12 Sections 20
Figure 13 Conceptual Sections 21
Figure 14 Related Project Location Map 26
Figure 15 Air Quality Sensitive Receptors 39
Figure 16 Noise Monitoring and Sensitive Receptor Map 87

LIST OF TABLES:

Table 1 Proposed Development Program 13
Table 2 Proposed Setbacks 13
Table 3 Related Projects List 25
Table 4 Maximum Daily Construction Emissions 36
Table 5 Maximum Daily Operational Emissions 37
Table 6 Proposed Project Construction-Related Greenhouse Gas Emissions 59
Table 7 Proposed Project Operational Greenhouse Gas Emissions 60
Table 8 Existing Ambient Daytime Noise Levels in Project Vicinity 79
Table 9 Maximum Construction Noise Levels 81
Table 10 Typical Outdoor Construction Noise Levels 82
Table 11 Vibration Damage Potential Threshold Criteria 85
Table 12 Vibration Source Levels for Construction Equipment 85
Table 13 SCAG's Connect SoCal Growth Forecast for Unincorporated Areas for Los Angeles County .. 88
Table 14 Proposed Project Estimated Student Generation 92
Table 15 Los Angeles County Recreation and Park Facilities within the Project Area 93
Table 16 Proposed Project Estimated Water Demand 106
Table 17 Proposed Project Estimated Wastewater Generation 107
Table 18 Estimated Construction and Demolition Debris 109
Table 19 Expected Operational Solid Waste Generation 109
Table 20 Projected Cumulative Housing Units 117
Table 21 Projected Cumulative Student Generation 119
Table 22 Projected Cumulative Water Demand 121
Table 23 Projected Cumulative Wastewater Generation 121
Table 24 Cumulative Operational Solid Waste Generation 123

APPENDICES:

Appendix A: Air Quality Modeling Worksheets
Appendix B: Greenhouse Gas Emissions Worksheets
Appendix C: Environmental Site Assessment
Appendix D: Noise Monitoring Data
Appendix E: Consultation Letters

Environmental Checklist Form (Initial Study)

County of Los Angeles, Department of Regional Planning

Project title: Willowbrook III Project / Project No. PRJ2021-000053 / Case No(s). RPPL2021000160, RPPL2021006758, and RPPL2021003907 ("Proposed Project")

Lead agency name and address: Los Angeles County, 320 West Temple Street, Los Angeles, CA 90012

Contact Person and phone number: Zoe Axelrod, Regional Planner, (213) 974-6411

Project sponsor's name and address: Cody Snyder, Entitlement/Land Use Consultant, Linc Housing. ("Applicant"), 3590 Elm Avenue, Long Beach, CA 90807

Project location: 12611, 12617, and 12625 S. Willowbrook Avenue, Compton, CA 90222 ("Project Site")
APN: 6152-002-021, 6152-002-900 and 6152-002-901, *USGS Quad*: South Gate 7.5 Minute Quadrangle

Gross Acreage: 1.21 acres

General plan designation: H9 (Residential: 0-9 du/net ac)

Community/Area wide Plan designation: N/A

Zoning: R-1 (Single-Family Residence Zone), Willowbrook Community Standards District

Description of project: See Project Description below.

Surrounding land uses and setting: See Project Description below.

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code § 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Project notification letters were issued via mail and email to California Native American Tribes which have requested formal notification. Consultation with the Gabrieleno Band of Mission Indians (Kizh Nation) commenced on September 23, 2021. The outcome of the consultation is further discussed below in Section 18, Tribal Cultural Resources.

Other public agencies whose approval may be required (e.g., permits, financing approval, or participation agreement):

Public Agency	*Approval Required*
N/A	N/A

Major projects in the area:

Project/Case No.	*Description and Status*
N/A	N/A

Reviewing Agencies:

Responsible Agencies

- ☐ None
- Regional Water Quality Control Board:
  - ☒ Los Angeles Region
  - ☐ Lahontan Region
- ☐ Coastal Commission
- ☐ Army Corps of Engineers
- ☐ LAFCO

Special Reviewing Agencies

- ☒ None
- ☐ Santa Monica Mountains Conservancy
- ☐ National Parks
- ☐ National Forest
- ☐ Edwards Air Force Base
- ☐ Resource Conservation District of Santa Monica Mountains Area

Regional Significance

- ☒ None
- ☐ SCAG Criteria
- ☐ Air Quality
- ☐ Water Resources
- ☐ Santa Monica Mtns. Area

Trustee Agencies

- ☒ None
- ☐ State Dept. of Fish and Wildlife
- ☐ State Dept. of Parks and Recreation
- ☐ State Lands Commission
- ☐ University of California (Natural Land and Water Reserves System)

County Reviewing Agencies

- ☒ DPW
- ☐ Fire Department
  - Forestry, Environmental Division
  - Planning Division
  - Land Development Unit
  - Health Hazmat
- ☐ Sanitation District
- ☐ Public Health/Environmental Health Division: Land Use Program (OWTS), Drinking Water Program (Private Wells), Toxics Epidemiology Program (Noise)
- ☐ Sheriff Department
- ☐ Parks and Recreation
- ☐ Subdivision Committee

Environmental Factors Potentially Affected:

The environmental factors checked below would be potentially significant impacts affected by this project.

☒ Aesthetics	☐ Greenhouse Gas Emissions	☐ Public Services
☐ Agriculture/Forestry	☐ Hazards/Hazardous Materials	☐ Recreation
☐ Air Quality	☐ Hydrology/Water Quality	☐ Transportation
☒ Biological Resources	☐ Land Use/Planning	☒ Tribal Cultural Resources
☒ Cultural Resources	☐ Mineral Resources	☒ Utilities/Services
☐ Energy	☒ Noise	☐ Wildfire
☐ Geology/Soils	☐ Population/Housing	☒ Mandatory Findings of Significance

DETERMINATION: (To be completed by the Lead Department.)
On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature (Prepared by) — Date: 12/13/2021

Signature (Approved by) — Date: 12/13/2021

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources the Lead Department cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3) Once the Lead Department has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level. (Mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced.)
5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA processes, an effect has been adequately analyzed in an earlier EIR or negative declaration. (State CEQA Guidelines § 15063(c)(3)(D).) In this case, a brief discussion should identify the following:
    a) Earlier Analysis Used. Identify and state where they are available for review.
    b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of, and adequately analyzed in, an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
    c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
7) The explanation of each issue should identify: the significance threshold, if any, used to evaluate each question, and; mitigation measures identified, if any, to reduce the impact to less than significant. Sources of thresholds include the County General Plan, other County planning documents, and County ordinances. Some thresholds are unique to geographical locations.

Project Description

A. PROJECT LOCATION

The Project Site is located at 12611, 12617, and 12625 S. Willowbrook Avenue in Compton, California. As shown in Figure 1, Project Location Map, the Project Site is located in the unincorporated community of Willowbrook in central Los Angeles County, northwest of the City of Compton and west of the City of Lynwood. The Project Site is bounded by single- and multi-family residences to the west, S. Willowbrook Avenue to the east, Pacific Electric Railroad Line (Los Angeles County Metropolitan Transportation Authority [Metro] Blue Line) to the east running parallel to S. Willowbrook Avenue, single- and multi-family residences to the north, across 126th Street, and multi-family residences to the immediate south with commercial and institutional uses further south at the intersection of S. Willowbrook Avenue and El Segundo Boulevard.

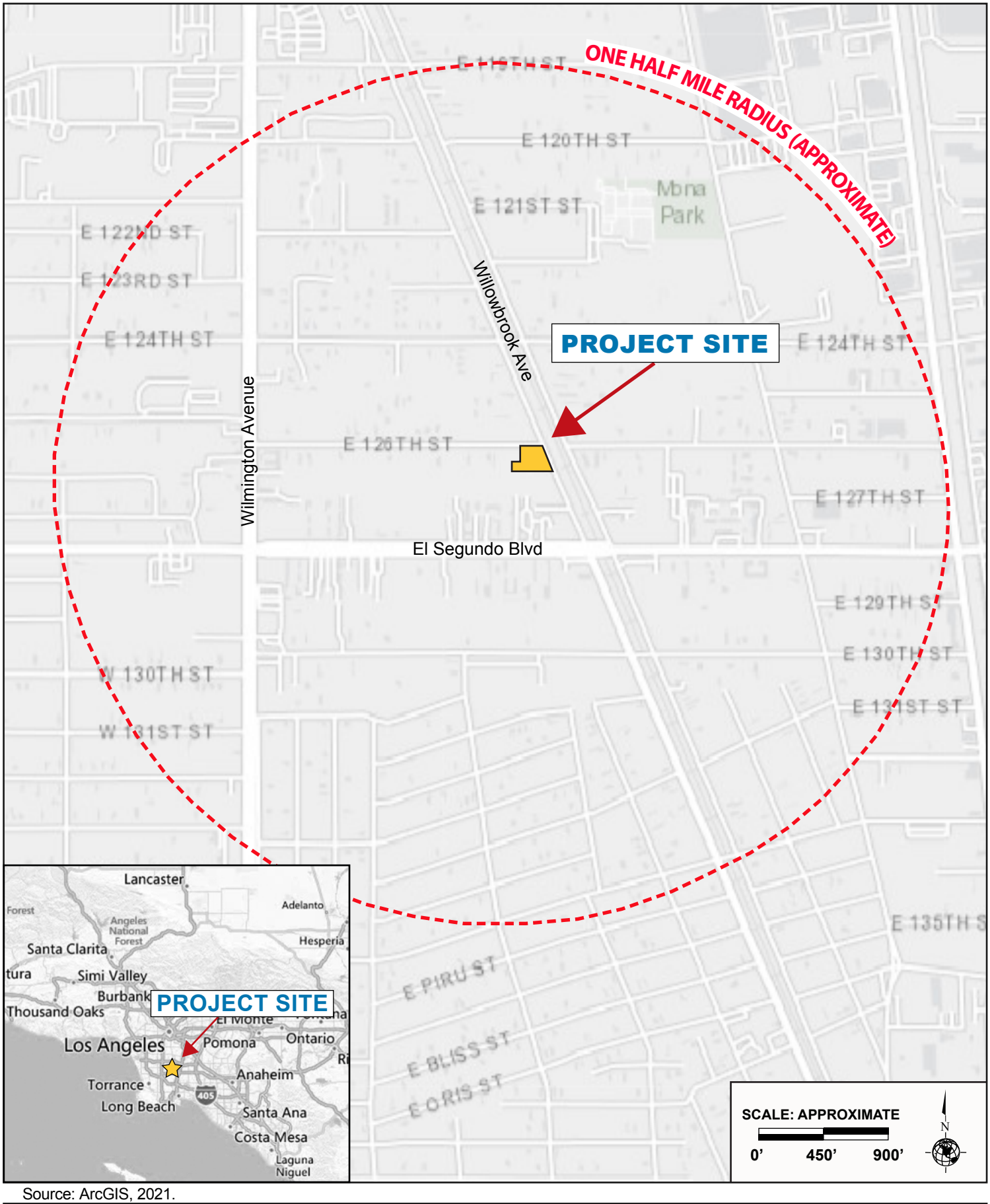
The Project Site is identified by the following County of Los Angeles Assessor Parcel Numbers (APNs): 6152-002-021, 6152-002-900 and 6152-002-901. The Project Site consists of three contiguous parcels of land that comprise approximately 52,810 square feet (1.21 acres).

Regional and Local Access

Regional access to the Project Site is provided by the Harbor Freeway (I-110), located west of the Project Site; the Long Beach Freeway (I-710), located east of the Project Site; the Glenn Anderson Freeway (I-105), located north of the Project Site; and the Gardena Freeway (SR-91) located south of the Project Site.

Local access to the Project Site is provided by E. 126th Street, S. Willowbrook Avenue, El Segundo Boulevard and N. Wilmington Avenue. E. 126th Street is a two-lane east-west roadway located immediately north of the Project Site. Parking is provided on both sides of E. 126th Street. S. Willowbrook Avenue is a two-lane north-south roadway located on the east frontage of the Project Site. Parking is provided on the west side of S. Willowbrook Avenue in the project vicinity. El Segundo Boulevard is a four- to six-lane east-west roadway located south of the Project Site. Parking is provided on both sides of El Segundo Boulevard. N. Wilmington Avenue is located one block west of the project and is a two-lane north-south roadway. Parking is permitted on both sides of N. Wilmington Avenue.

The Project Site is served by bus and rail transit lines operated by Metro and the Los Angeles County Public Works Transit (The Link-Willowbrook). Metro Bus Line 202 provides access between Lynwood and Long Beach via Alameda Street. The Metro bus stop serving Line 202 is located 0.1 mile south of the Project Site at the intersection of S. Willowbrook Avenue and El Segundo Boulevard. Metro's Blue Line provides service between Downtown Los Angeles and Downtown Long Beach. Metro's Blue Line runs parallel to the Project Site to the east of S. Willowbrook Avenue. Metro's Willowbrook/Rosa Parks Blue Line rail station is located approximately 0.8 mile north of the Project Site at the intersection of S. Willowbrook Avenue and S. 117th Street. Metro's Compton Blue Line rail station is located 1.5 miles south of the Project Site near the intersection of E. Compton Boulevard and S. Willowbrook Avenue. The Link-Willowbrook provides access to key destinations within the Willowbrook community and provides connections to transit providers including Metro, DASH, Compton Renaissance and GTrans. The Link-Willowbrook bus stop serving the Project Site is located immediately fronting the Project Site at the intersection of E. 126th Street and S. Willowbrook Avenue.



Source: ArcGIS, 2021.

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Figure 1
Project Location Map

Existing Conditions

The Project Site includes one developed parcel and two partially vacant parcels. The developed parcel (APN. 6152-002-021) is currently occupied by a child development center that consists of three one-story buildings (totaling 4,182 square feet) and associated surface parking. The two partially vacant parcels (APN. 6152-002-900 and 6152-002-901) include a paved playground area that is located along the western boundary of the Project Site. The playground area is associated with the child development center on the northern parcel of the Project Site. The playground area is separated from the vacant lots to the east by a fence. An aerial photograph and photographs depicting the current conditions on the Project Site are shown in Figure 2 and Figure 3. Existing vegetation on the Project Site is predominantly ruderal vegetation including grasses, shrubs, and weeds. The Project Site is approximately 80 feet above sea level. The Project Site's topography generally slopes to the southeast of the Project Site and is characterized as flat.

Land Use and Zoning

The County adopted the Los Angeles County General Plan 2035 (General Plan) on October 6, 2015. As shown in Figure 4, Zoning and Land Use Designations, the County of Los Angeles' General Plan designates the Project Site H9 (Residential: 0-9 du/net ac).[1] The H9 General Plan land use designation allows for the development of 0-9 dwelling units per net acre and is intended to guide the development of single-family residences. As such, the Project Site would support the development of 11 dwelling units under the current General Plan land use designation. The Proposed Project includes construction of a three-story 51-unit affordable housing development with 23 surface parking spaces, resulting in a proposed density of 42 dwelling units per acre. As such, the Proposed Project would not be consistent with the density or uses allowed for by the General Plan land use designation. Thus, the Applicant is proposing a General Plan Amendment from the existing General Plan land use designation of H9 (Residential: 0-9 du/net ac) to the General Plan land use category of H30 (Residential: 0-30 du/net ac) for the Proposed Project, which allows for 0-30 dwelling units per net acre. Under the H30 General Plan land use designation, the Project Site would accommodate up to 37 dwelling units. The Applicant is also requesting a 36% density bonus in exchange for setting aside 100% of the units as affordable to lower income households, to allow for the development of up to 51 dwelling units on the Project Site.

The Proposed Project would be consistent with the County's Density Bonus Ordinance and all applicable General Plan land use standards of the H30 land use designation. The General Plan Amendment for the Proposed Project would be consistent with the adjacent multi-family land uses, specifically the three-story Mosaic Gardens Apartments complex to the immediate south of the Project Site.

The Project Site is located in the Willowbrook community in the unincorporated area of the County of Los Angeles. The Project Site is zoned R-1 (Single-Family Residence). The Proposed Project includes construction of a 51-unit affordable housing development with 23 surface parking spaces. As such, the proposed multi-family residential structure is not consistent with the uses allowed in the R-1 Zone. Thus, the Applicant is proposing a zone change from R-1 to R-3 (Limited Density Multiple Residence) to accommodate the Proposed Project.

---

[1] County of Los Angeles Department of Regional Planning, 2015, Los Angeles County General Plan 2035, Chapter 6: Land Use Element, website: https://planning.lacounty.gov/assets/upl/project/gp_final-general-plan-ch6.pdf, accessed June 2021.



Source: Google Earth, Aerial View, 2021.

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Figure 2
Aerial Photograph of the Project Site and Surrounding Land Uses



View 1: From the east side of Willowbrook Avenue, looking southwest at the Project Site.



View 2: From the east side of Willowbrook Avenue, looking west at the Project Site.



View 3: From the east side of Willowbrook Avenue, looking southwest at the Project Site.



View 4: From the north side of 126th Street, looking southeast at the Project Site.



View 5: From the east side of Willowbrook Avenue, looking northwest at the Project Site.



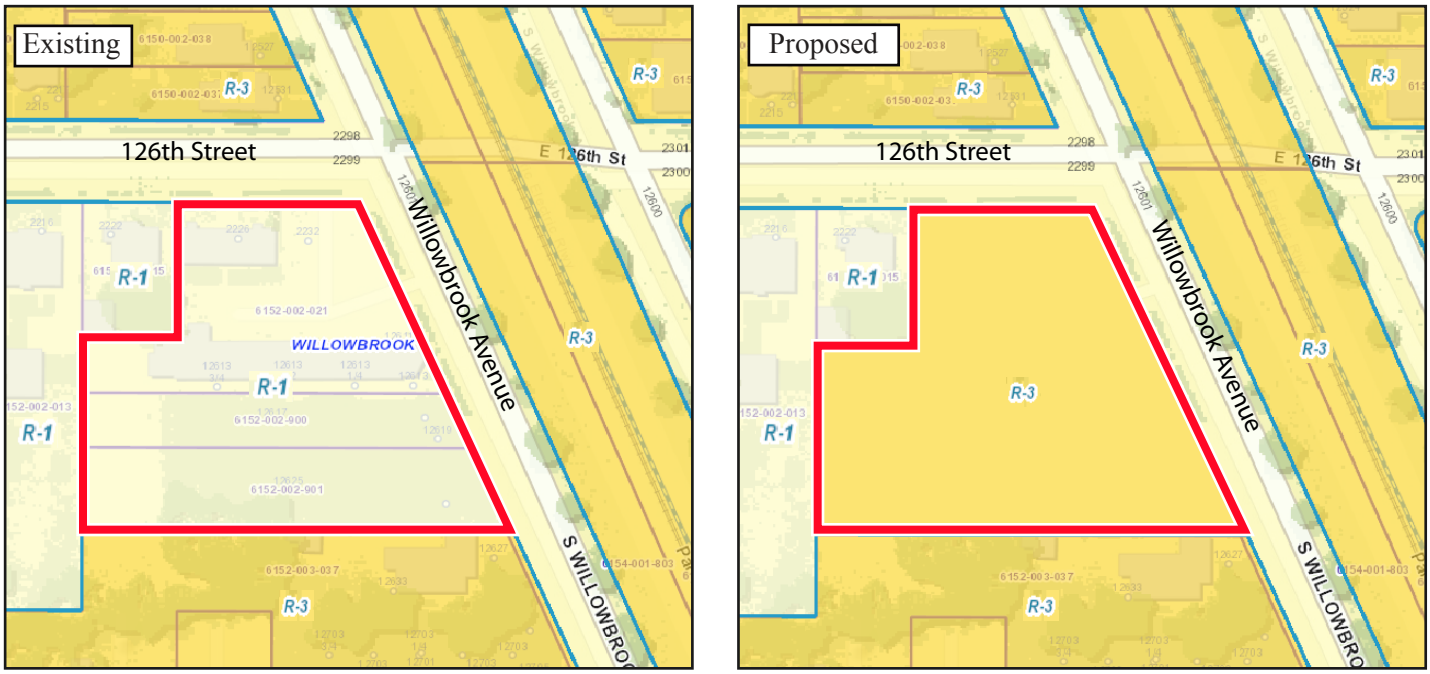
View 6: From the east side of Willowbrook Avenue, looking west at the Project Site.

Source: Parker Environmental Consultants, June 14, 2021.

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Figure 3
Photographs of the Project Site

Zoning Designations



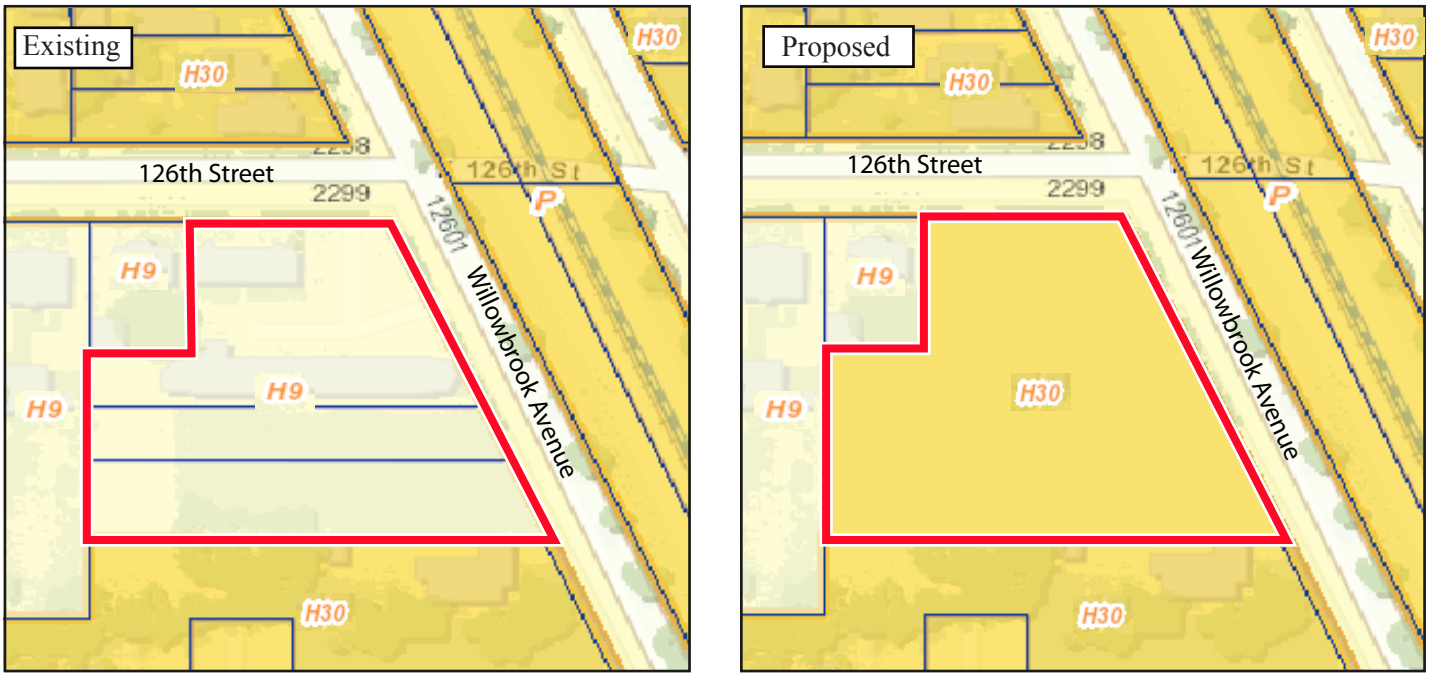
LEGEND

Project Site

R-1 (Single-Family Residence)

R-3 (Limited Multiple Residence)

General Plan Land Use Designations



LEGEND

Project Site

H9 (Residential 9)

H30 (Residential 30)

P (Public and Semi-Public)

Source: GIS-NET, County of Los Angeles, Department of Regional Planning, 2021.

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Figure 4
Zoning and Land Use Designations

Surrounding Land Uses

Photographs of the land uses immediately surrounding the Project Site are provided in Figure 5. As shown in Figure 5, the Project Site is surrounded by multi-family residences, single-family residences, and commercial uses.

To the east of the Project Site is S. Willowbrook Avenue followed by the Pacific Electric Railroad Line (also utilized by Metro's Blue Line), followed by single- and multi-family residences east of the rail line (see Figure 5, View 7 and 8). Under the General Plan, properties to the east of the Project Site occupied by the rail line are designated as P (Public and Semi Public) followed by H30 (Residential: 0-30 du/net ac). The properties to the east of the Project Site are zoned R-3 (Limited Density Multiple Residence). To the south of the Project Site is the Mosaic Gardens Apartments, which is a two- and three-story apartment complex, followed by commercial and institutional (church and school) uses at the intersection of S. Willowbrook and El Segundo Boulevard (see Figure 5, View 9). Properties to the south of the Project Site are designated as H30 and CG (General Commercial), respectively. The properties to the south of the Project Site are zoned R-3 and C-3 (General Commercial), respectively. To the north of the Project Site are single- and multi-family residences (see Figure 5, View 11). Properties to the north are designated as H30. The properties to the north of the Project Site are zoned R-3. To the west of the Project Site are single- and multi-family residences (see Figure 5, View 12). Properties to the west are designated as H9 (Residential: 0-9 du/net ac). The properties to the west of the Project Site are zoned R-1 (Single-Family Residence).



View 7: From the north side of 126th Street, looking southeast at the Pacific Electric Railroad east of the Project Site.



View 8: From the west side of Willowbrook Avenue, looking southeast at the residential and commercial properties east of the Project Site.



View 9: From the east side of Willowbrook Avenue, looking southwest at the residential properties south of the Project Site.



View 10: From the south side of 126th Street, looking northwest at the residential properties north of the Project Site.



View 11: From the south side of 126th Street, looking northwest at the residential properties north of the Project Site.



View 12: From the north side of 126th Street, looking southwest at the residential properties west of the Project Site.

Source: Parker Environmental Consultants, June 14, 2021.

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Figure 5
Photographs of the Surrounding Land Uses

B. PROPOSED DEVELOPMENT

The Proposed Project includes the construction of a 51-unit affordable housing development with 23 surface parking spaces. The Proposed Project would be comprised of a three-story residential building. The proposed building height is 41 feet above grade and would include 49,156 gross square feet of development. The Proposed Project would include 50 one-bedroom units and one two-bedroom manager's unit, utility storage, laundry, computer room, mail room, a community room with a kitchenette, and four office spaces for the Proposed Project's residents. A summary of the proposed development program is provided in Table 1, below. The proposed site plan is depicted in Figure 6. Figure 7 through Figure 10 depict the first, second, third and roof level, respectively.

Table 1
Proposed Development Program

Land Uses	Units	Percent of Project
Residential		
1-Bedroom Units	50 du	98%
2-Bedroom Units	1 du	2%
TOTAL RESIDENTIAL	**51 du**	**100%**

Notes: du = dwelling unit.
Source: D33, August 25, 2020

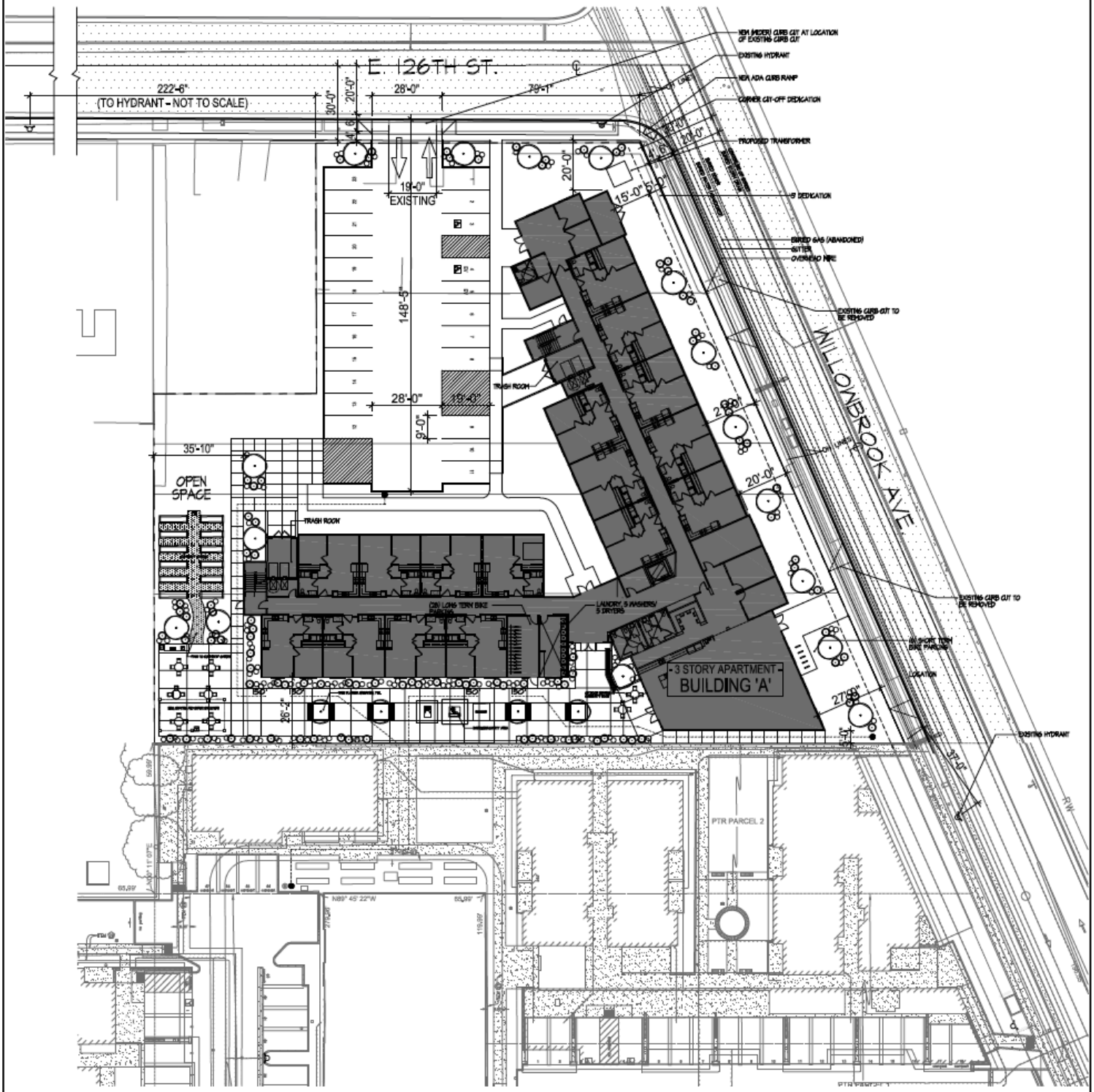
Architectural Features

The Proposed Project would consist of a three-story residential building with a height of 41 feet above grade. Per the Willowbrook Community Standards District (CSD), the maximum height permitted in the R-3 zone is 35 feet and two stories. In exchange for providing an affordable housing set-aside, the housing development is eligible to receive incentives to exceed the maximum height by six feet and an additional story. Surface parking would be provided at grade along the western and northern border of the Project Site. Building elevations and sections of the Proposed Project are depicted in Figure 11 through Figure 13. The Proposed Project would be designed to complement the surrounding neighborhood including the two- and three-story Mosaic Gardens Apartments to the south. The Proposed Project would be similar to the two- and -three-story multi-family residential buildings within the Project vicinity. The Proposed Project would improve the pedestrian experience along S. Willowbrook Avenue by providing sidewalk improvements, removing the two existing driveways, and providing a landscaped setback that includes trees. As shown in Table 2, the Proposed Project would provide setbacks consistent with the R-3 zoning. The Proposed Project's architecture would be sensitive to the single-family residences immediately to the west by providing a 35-foot side yard setback and landscaping on the west side of the Project Site.

Table 2
Proposed Setbacks

	West Side	North Front	South Side	East Front
Required	15 feet 0 inches	15 feet 0 inches	5 feet 0 inches	15 feet 0 inches
Provided	35 feet 0 inches	20 feet 0 inches	5 feet 1 inches	20 feet 0 inches

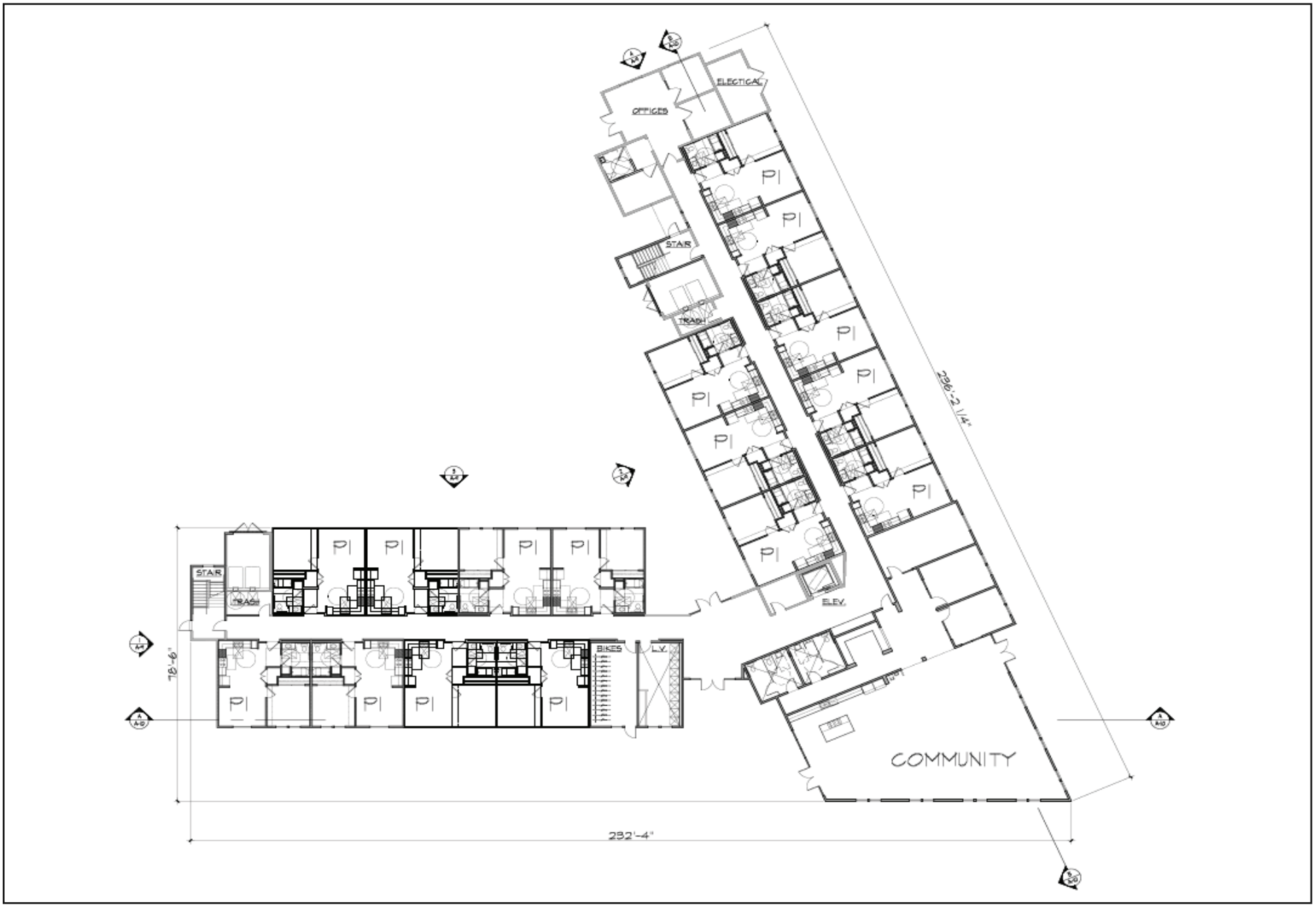
Source: D33, August 25, 2020



Source: D33, November 17, 2021.

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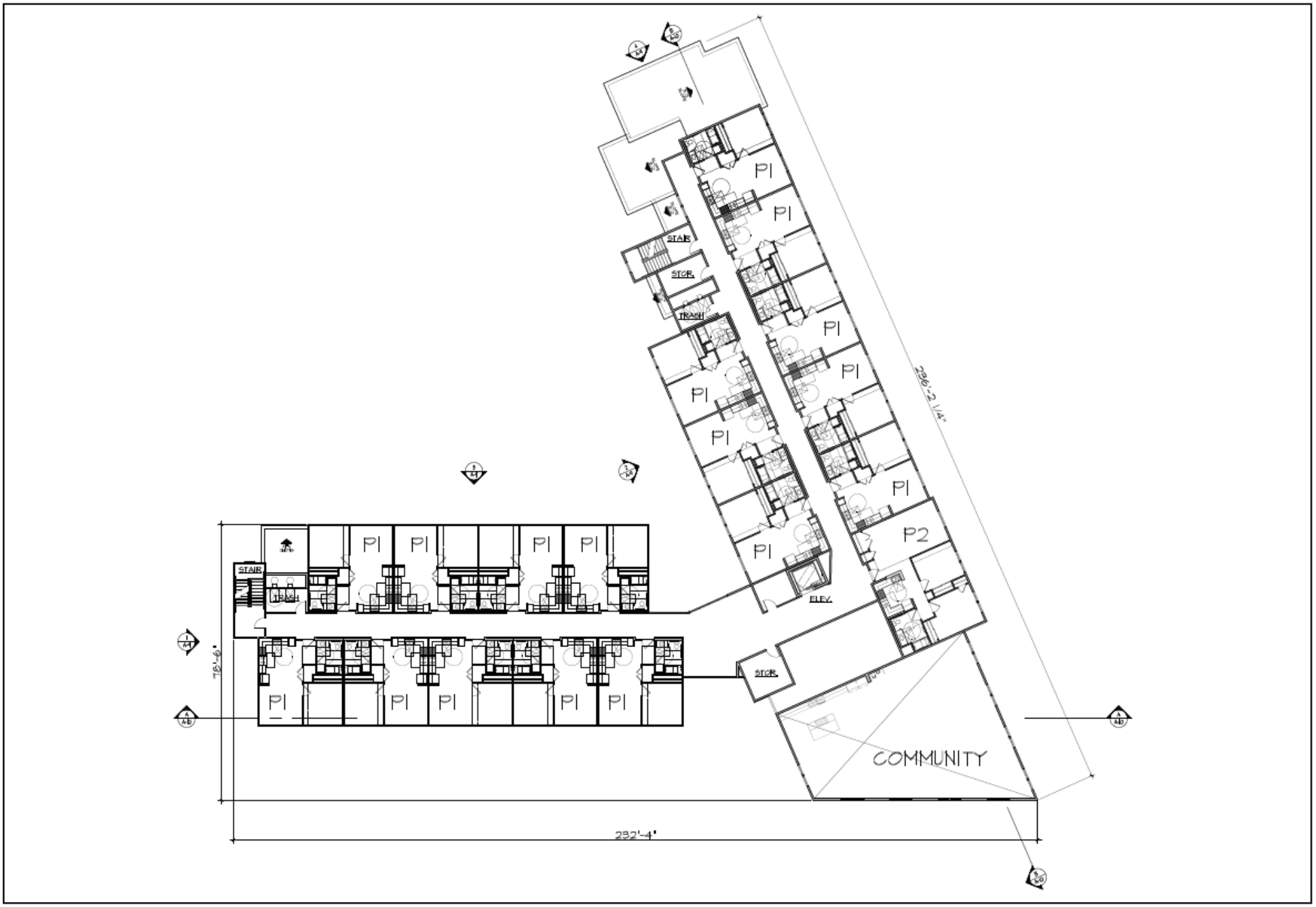
Figure 6
Site Plan



Source: D33, August 25, 2020.

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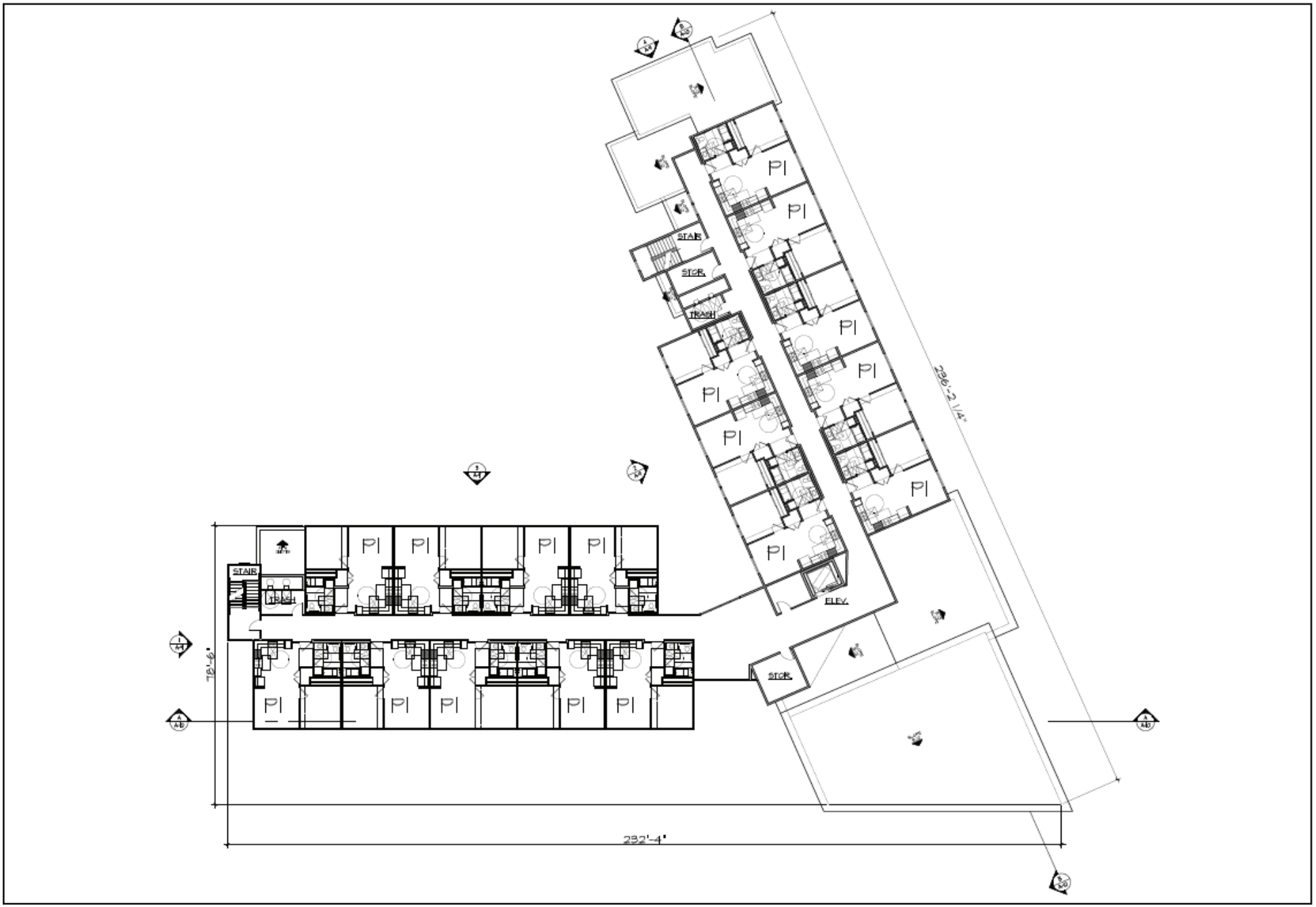
Figure 7
First Floor Plan



Source: D33, August 25, 2020.

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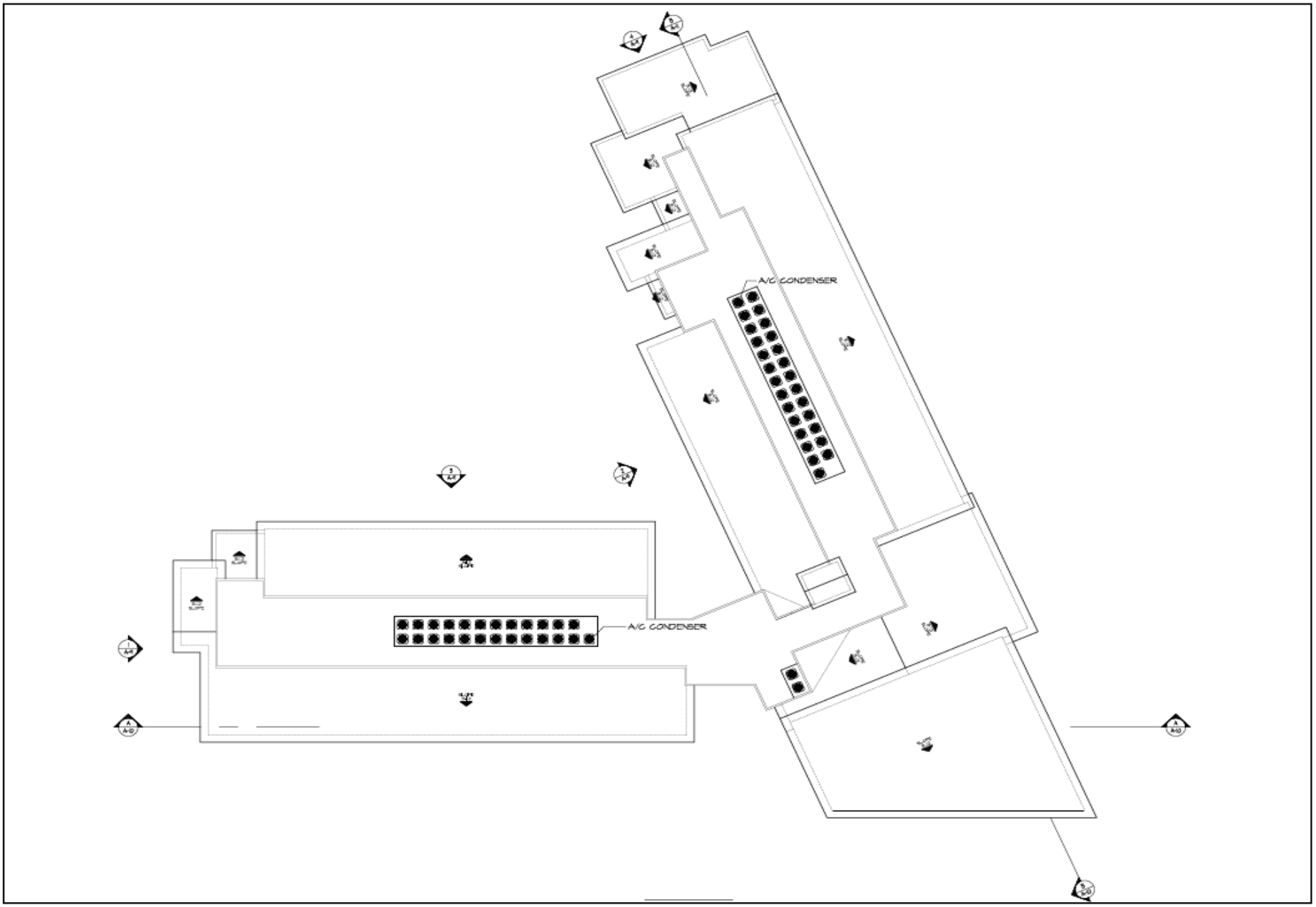
Figure 8
Second Floor Plan



Source: D33, August 25, 2020.

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Figure 9
Third Floor Plan



Source: D33, August 25, 2020.

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Figure 10
Roof Plan



Front Elevation (Willowbrook Avenue)

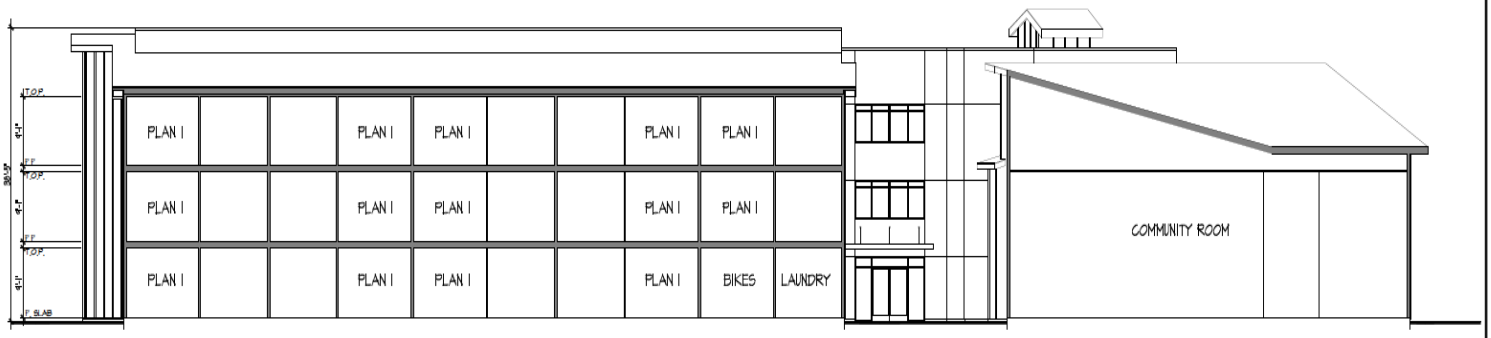


Side Elevation

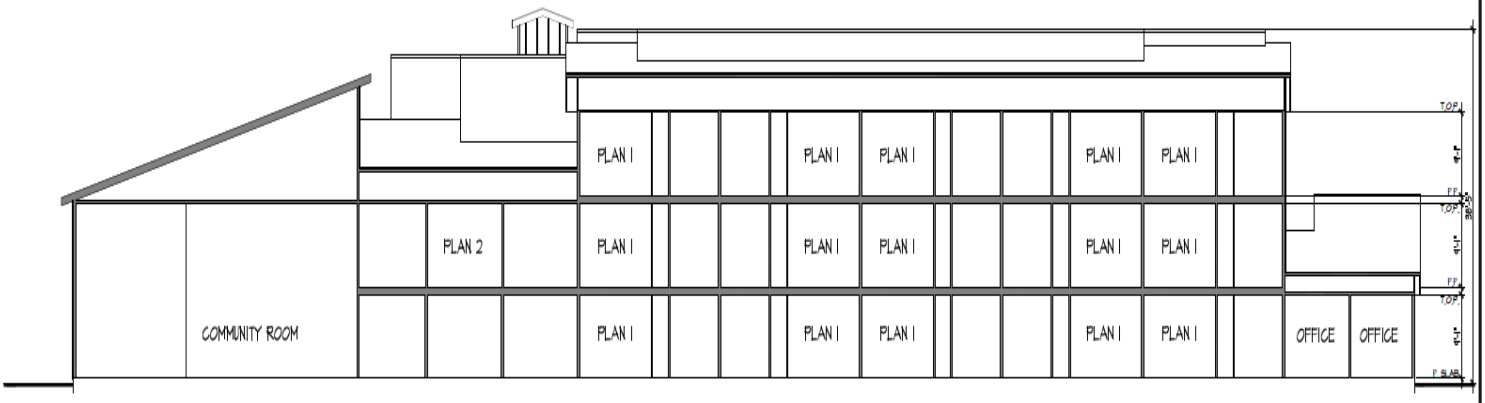
Source: D33, August 25, 2020.

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Figure 11
Elevations



Section A

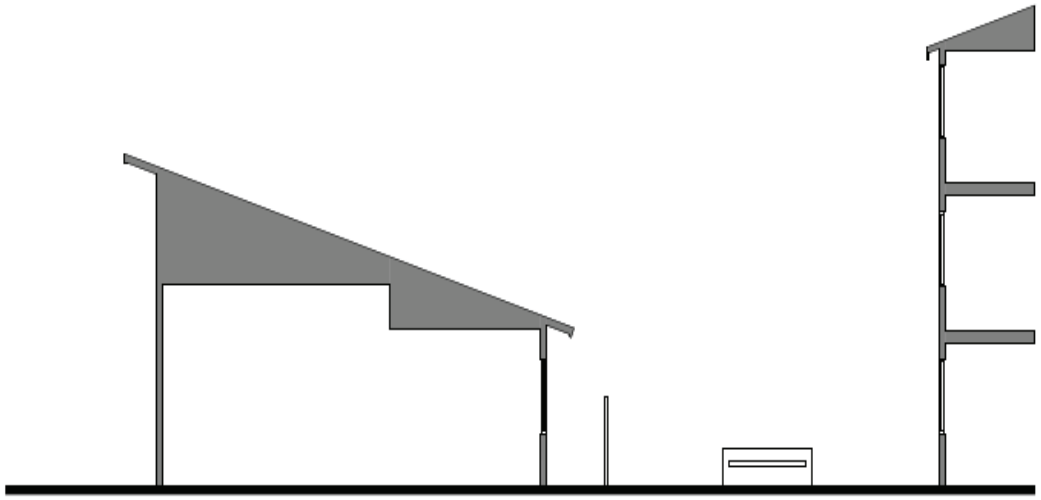


Section B

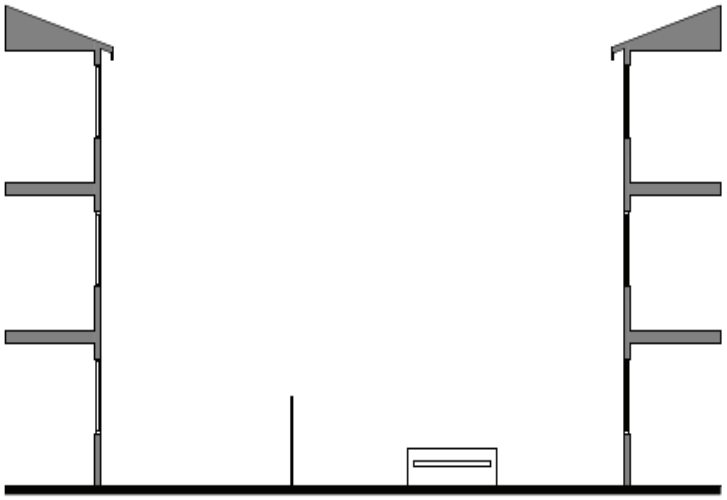
Source: D33, August 25, 2020.

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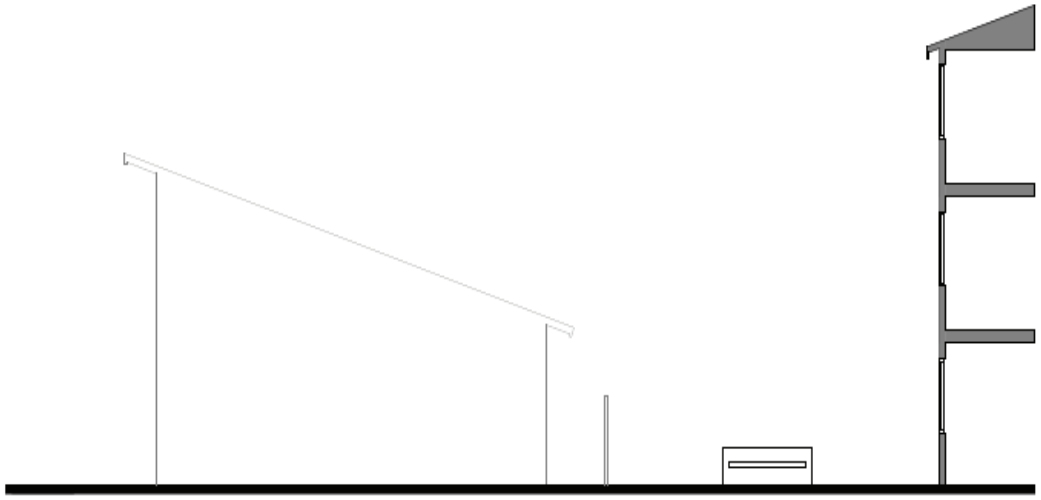
Figure 12
Sections



Conceptual Site Section ‘A’ - At adjacent community building



Conceptual Site Section ‘C’ - At adjacent apartment building



Conceptual Site Section ‘B’ - At adjacent tot lot

Source: D33, August 25, 2020.

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Figure 13
Conceptual Sections

Open Space and Landscaping

The Proposed Project will provide 17,000 square feet of common open space area on the ground floor, which includes a community room, a computer room, office space and exterior open space. Per the Willowbrook Community Standards District (CSD), a minimum of 20 percent of the lot must be landscaped or hardscaped, with open, usable outdoor space. The Proposed Project will also feature 25,004 square feet of proposed landscaped area, or 47 percent of the lot.

Parking and Access

Pursuant to Chapter 22.120.080 of the Los Angeles County Municipal Code, the Proposed Project is exempt from providing parking onsite as it would provide 100 percent affordable rental housing units to lower income households. However, a total of 23 parking spaces are proposed to be provided at grade along the western and northern border of the Project Site. The Proposed Project proposes one ingress/egress driveway from E. 126th Street.

Additionally, pursuant to Chapter 22.112.100 of the Los Angeles County Municipal Code, the Proposed Project would be required to provide one long-term bicycle space for every two dwelling units and one short-term bicycle space for every ten dwelling units. As such the Proposed Project would be required to provide 26 long-term spaces and six short-term spaces. The Proposed Project would provide 28 long-term and six short-term bicycle parking spaces.

Project Design Features

The Proposed Project would comply with Title 24 California Building Standards Code requirements. In addition, the Proposed Project would incorporate the following project design features (PDFs) to support and promote environmental sustainability:

PDF-1 All exterior building lighting, security lighting and parking area lighting shall be designed, shielded, directed downward, and located as to avoid intrusive effects on adjacent properties. Low-intensity exterior lighting shall be used throughout the development to the extent feasible, subject to approval by the County. Lighting fixtures shall use shielding to prevent spillover lighting on adjacent off-site uses.

PDF-2 The Project shall incorporate water conservation measures in its landscape design and installation. The Project landscape plan shall incorporate the following:

- Weather-based irrigation controller with rain shutoff
- Matched precipitation (flow) rates for sprinkler heads
- Drip/microspray/subsurface irrigation where appropriate
- Proper hydro-zoning, turf minimization and use of native/drought tolerant plan materials
- Use of landscape contouring to minimize precipitation runoff
- A separate water meter (or submeter), flow sensor, and master valve shutoff shall be installed for irrigated landscape areas totaling 5,000 square feet and greater.

PDF-3 The Project shall incorporate the following water conservation features into its design:

- Install high-efficiency toilets (maximum 1.28 gpf), including dual-flush water closets, and high-efficiency urinals (maximum 0.5 gpf), including no-flush or waterless urinals, in all restrooms as appropriate.

- Install restroom faucets with a maximum flow rate of 1.5 gallons per minute.

Construction

Construction of the Proposed Project is anticipated to occur over an approximate 21-month period. Buildout and occupancy is anticipated by 2025. The construction process would be divided into the following phases: (1) Demolition/Site Clearing, (2) Excavation/Grading/Structural Foundation, (3) Structural Framing/Building/Finishing, and (4) Architectural Coating.

Construction of the Proposed Project would require the demolition of the existing child development center that consists of three one-story buildings (totaling 4,182 square feet) and associated surface parking. The Proposed Project would also include clearance of the existing vegetation on the Project Site. Demolition/Site clearing is anticipated to take approximately one month.

The excavation, grading, and foundation phase is anticipated to occur over a one-month period immediately following the demolition/site clearing phase. The Proposed Project would require the export of approximately 5,000 cubic yards of soil. Trucks for soil export and construction material delivery would enter and exit the Project Site from S. Stanford Avenue. The excavation, grading, and foundation phase is anticipated to take approximately one-month.

The building construction phase is estimated to occur over an approximate 16-month period immediately following the completion of the building foundation. This phase would also include paving of the internal sidewalks and roadways.

The finishing phases of construction usually involve painting the interior of the buildings and installation of windows, millwork and flooring materials. The finishing phase of the Proposed Project is expected to occur during the final three months of the construction process.

It is anticipated that construction activities may necessitate temporary lane closures on S. Willowbrook Avenue adjacent to the Project Site on an intermittent basis for utility relocations/hook-ups, and other construction activities may be required. However, site deliveries and the staging of all equipment and materials would be organized in the most efficient manner possible on-site to mitigate any temporary impacts to the neighborhood and surrounding traffic. Construction equipment would be staged on-site for the duration of construction activities. Traffic lane and right-of-way closures, if required, would be properly reviewed and permitted by Public Works.

All construction debris would be recycled to comply with state and local requirements. Construction debris and soil materials from the site that cannot be recycled or diverted would likely be hauled to the Calabasas Landfill, located near the City of Agoura Hills, and the Scholl Canyon Landfill, located in the City of Glendale, which serve the County of Los Angeles. The Calabasas Landfill is approximately 42 miles northwest of the Project Site (approx. 84-miles round trip). The Scholl Canyon Landfill is approximately 22 miles to the north of the Project Site (approx. 44-miles round trip). For construction waste recycling efforts, the Puente Hills Materials Recovery Facility (MRF), the Palos Verdes Landfill, the Downey Area Recycling and Transfer (DART) Facility, and the South Gate Transfer Station would serve the Project Site.

As discussed above, the Proposed Project would require the export of approximately 5,000 cubic yards of soil. For purposes of analyzing the construction-related impacts, it is anticipated that the excavation and soil export would involve 18-wheel bottom-dump trucks with an average of 12 cubic yard hauling capacity. All truck staging would either occur on-site or at designated off-site locations and radioed into the site to be filled. The anticipated export of 5,000 cubic yards of soil route would include entering/exiting the Project Site from

S. Willowbrook Avenue. The route would then extend westbound on El Segundo Boulevard to the I-110 Freeway north or southbound or northbound on Wilmington Avenue to the 105 Freeway.

Related Projects

In accordance with CEQA Guidelines Section 15064(h), this Draft IS/MND includes an evaluation of the Proposed Project's cumulative impacts. The guidance provided under CEQA Guidelines Section 15064 (h) is as follows:

> *"(1) When assessing whether a cumulative effect requires an EIR, the lead agency shall consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable. An EIR must be prepared if the cumulative impact may be significant and the project's incremental effect, though individually limited, is cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.*
>
> *(2) A lead agency may determine in an initial study that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant. When a project might contribute to a significant cumulative impact, but the contribution will be rendered less than cumulatively considerable through mitigation measures set forth in a mitigated negative declaration, the initial study shall briefly indicate and explain how the contribution has been rendered less than cumulatively considerable.*
>
> *(3) A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program (including, but not limited to, water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, plans or regulations for the reduction of greenhouse gas emissions) that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. When relying on a plan, regulation or program, the lead agency should explain how implementing the particular requirements in the plan, regulation or program ensure that the project's incremental contribution to the cumulative effect is not cumulatively considerable. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding that the project complies with the specified plan or mitigation program addressing the cumulative problem, an EIR must be prepared for the project.*
>
> *(4) The mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable."*

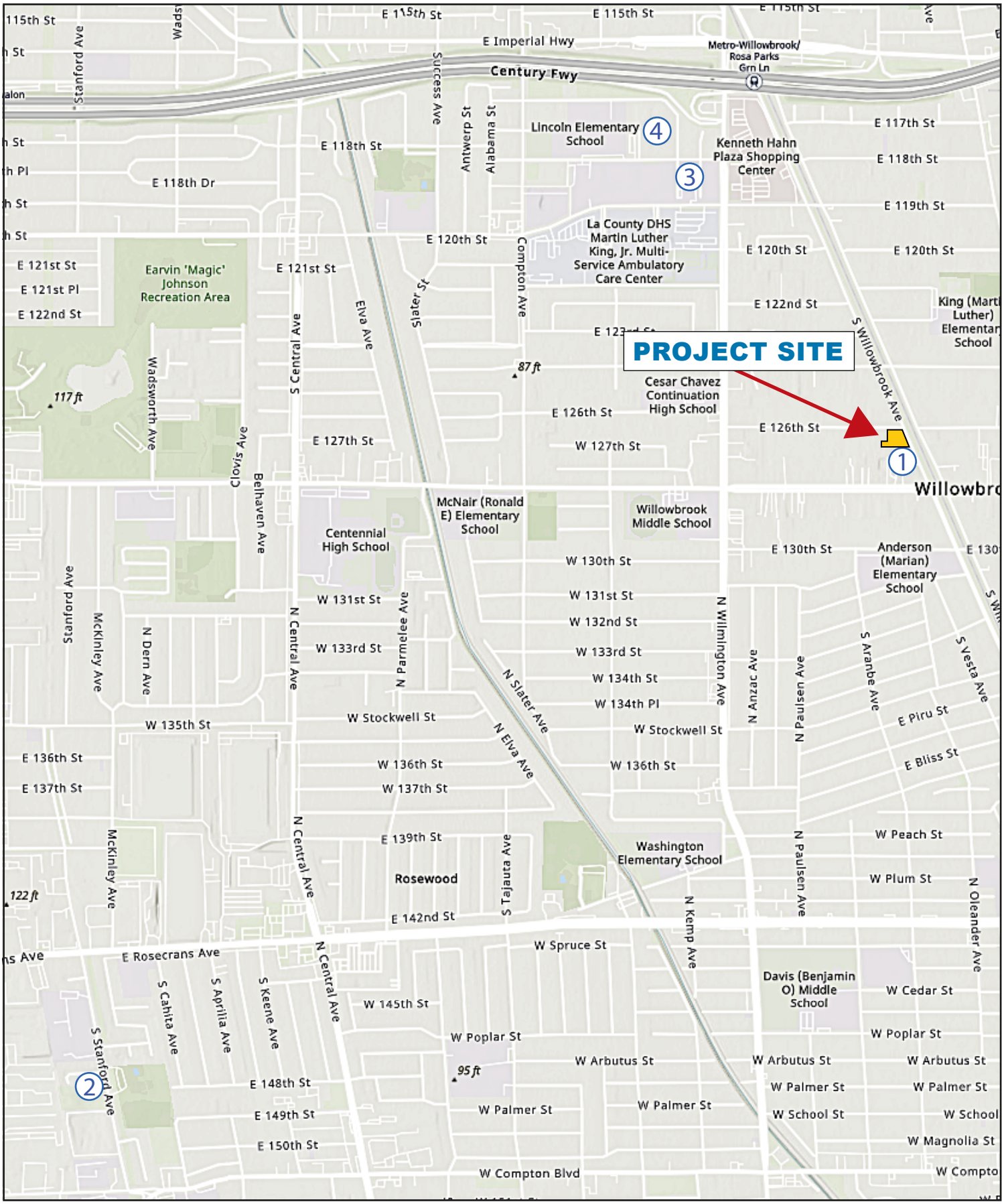
In light of the guidance summarized above, an adequate discussion of a project's significant cumulative impact, in combination with other closely related projects, can be based on either: (1) a list of past, present, and probable future producing related impacts; or (2) a summary of projections contained in an adopted local, regional, statewide plan, or related planning document that describes conditions contributing to the cumulative effect. (CEQA Guidelines Section 15130(b)(1)(A)-(B). The lead agency may also blend the "list" and "plan" approaches to analyze the severity of impacts and their likelihood of occurrence. Accordingly, all proposed, recently approved, under construction, or reasonably foreseeable projects that could produce a related or cumulative impact on the local environment, when considered in conjunction with the Proposed Project, were identified for evaluation.

The related projects identified are included in Table 3, below. A total of four related projects were identified within the affected Project area. An analysis of the cumulative impacts associated with these related projects and the Proposed Project are provided in Section 21. Mandatory Findings of Significance. The locations of the related projects are shown in Figure 14, Related Projects Location Map.

Table 3
Related Projects List

Project Number	Project Name	Location/Address	Project Description	Size	Units
1. R2014-01658	Mosaic Gardens	12701 S Willowbrook Avenue	Multifamily housing (100% affordable)	61,775 sf	61 du
2. R2015-02448	Stanford Ave Apartments	14733 S. Stanford Avenue	Supportive housing (City of Compton)	112,954 sf	85 du
3. 2017-005814	Springhaven Willowbrook II	1854 E. 118th Street	Multifamily housing (100% affordable)	128,273 sf	100 du
4. 2018-003184	Ashley Willowbrook	11739 Holmes Avenue	Multifamily housing (100% affordable)	54,358 sf	61 du

Notes: du = dwelling unit, sf = square feet
Source: Los Angeles County Department of Regional Planning, August 2021.



Source: Los Angeles Department of Regional Planning, August 2021; ArcGIS, 2021.

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Figure 14
Related Projects Map

C. ENTITLEMENT REQUESTS

The Applicant is requesting that the following entitlements be granted by the County of Los Angeles as the designated lead agency:

1. A General Plan Amendment to change the designated land use category on the Project Site from H9 (Residential: 0-9 du/net ac) to H30 (Residential: 0-30 du/net ac).

2. A Zone Change from the existing R-1 (Single-Family Residence) zone to the R-3 (Limited Density Multiple Residence) zone.

3. An Administrative Housing Permit to approve a 51-unit multi-family residential development with 100% of the units set aside as affordable units to serve lower income households, including a 36% density bonus and incentives to increase the maximum building height and number of stories.

4. A Site Plan Review to approve the construction of the 51-unit multi-family residential development.

Related approvals (as needed), ministerial or otherwise, may be necessary, as the County finds appropriate to execute and implement the Proposed Project. Other responsible governmental agencies may also serve as a responsible agency for certain discretionary approvals associated with the construction process, which include, but are not limited to the South Coast Air Quality Management District (construction-related air quality emissions) and the Regional Water Quality Control Board, Los Angeles Region (construction- related water quality).

Environmental Impact Analysis

1. AESTHETICS

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒

The Project Site is located in an urbanized area in in the unincorporated community of Willowbrook in central Los Angeles County. Based on the review of the County of Los Angeles (County) Conservation and Natural Resources Element of the General Plan, the Project Site is not located within a designated scenic vista.[2] The Project Site includes one developed parcel and two partially vacant parcels. The developed parcel (APN 6152-002-021) is currently occupied by a child development center and associated surface parking. (see Figure 3, Photographs of the Project Site.) The Project Site is bounded by single- and multi-family residences to the west, S. Willowbrook Avenue to the east, a rail line to the east running parallel to S. Willowbrook Avenue, single- and multi-family residences to the north, across 126th Street, and multi-family residences to the immediate south with commercial and institutional uses further south at the intersection of S. Willowbrook Avenue and El Segundo Boulevard. (see Figure 5, Photographs of the Surrounding Land Uses.) Due to the relatively flat topography and extent of development within the immediate area, there are no scenic views or vantage points that afford scenic views from or to the Project Site. The Proposed Project would improve the Project Site with a 51-unit affordable housing project approximately 41 feet above grade at its highest point. The Proposed Project would alter the existing views and character of the Project Site and immediate surrounding area in a manner that is compatible with the urban setting of the surrounding area. As there are no scenic vistas located in the immediate area, the development of the Proposed Project would not impact any scenic vistas. Therefore, no impact to any recognized or valued scenic views would occur.

b) Be visible from or obstruct views from a regional riding, hiking, or multi-use trail?	☐	☐	☐	☒

The nearest trail is the County-managed Los Angeles River Trail, located approximately 4 miles east of the Project Site.[3] The Project Site cannot be viewed from the Los Angeles River Trail due to distance, flat topography and existing development within the vicinity. The distance from the Los Angeles River Trail and the Project Site's flat topography curtails any obstruction of views from the trail attributed to the Proposed Project. Therefore, no impact to views from a regional riding or hiking trail would occur.

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2 County of Los Angeles Department of Regional Planning, 2015, Los Angeles County General Plan, Chapter 9: Conservation and Natural Resources Element, website: https://planning.lacounty.gov/generalplan/generalplan, accessed June 2021.

3 County of Los Angeles, Department of Parks and Recreation, Trails, website: http://trails.lacounty.gov, accessed June 2021.

c) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? ☐ ☐ ☐ ☒

The Project Site is not located within or along a designated scenic corridor and is not considered a scenic resource.[4] The Project Site is bordered by S. Willowbrook Avenue to the east and 126th Street to the north, which are not designated as scenic highways. Furthermore, no scenic highways are located within the vicinity of the Project Site. The Project Site includes one developed parcel and two partially vacant parcels. The developed parcel (APN 6152-002-021) is currently occupied by a child development center consisting of three one-story buildings and associated surface parking. The buildings were constructed in 1963 but are not designated as a historic resource.[5,6] Existing vegetation on the Project Site is predominantly ruderal vegetation including grasses, shrubs, and weeds. No oak trees or other unique native trees are present on the Project Site. As such, the Project Site does not contain any natural scenic resources, such as native habitat, locally protected tree species, or unique geologic features. Therefore, no impact to scenic resources within a state scenic highway would occur.

d) Substantially degrade the existing visual character or quality of public views of the site and its surroundings because of height, bulk, pattern, scale, character, or other features and/or conflict with applicable zoning and other regulations governing scenic quality? (Public views are those that are experienced from publicly accessible vantage point) ☐ ☒ ☐ ☐

A significant impact would occur if the Proposed Project were to substantially degrade the existing visual character or quality of public views of the Project Site and its surroundings. As discussed above in Checklist question 1 (a), the Project Site and project vicinity are not located within a scenic vista.[7] The Project Site includes one developed parcel and two partially vacant parcels. The developed parcel (APN 6152-002-021) is currently occupied by a child development center and associated surface parking. The Project Site is bounded by single- and multi-family residences to the west, S. Willowbrook Avenue to the east, a rail line to the east running parallel to S. Willowbrook Avenue, single- and multi-family residences to the north, across 126th Street, and multi-family residences to the immediate south with commercial uses further south at the intersection of S. Willowbrook Avenue and El Segundo Boulevard. Due to the relatively level topography and extent of urban development within the immediate area, there are no scenic views or vantage points that afford scenic views of the Project Site or from the Project Site at publicly accessible vantage points.

The Proposed Project would improve the Project Site with a 51-unit affordable housing project approximately 41 feet above grade at its highest point. The Proposed Project would alter the existing views and character of the Project Site and immediate surrounding area in a manner that is compatible with the urban setting of the

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4 County of Los Angeles Department of Regional Planning, 2015, Los Angeles County General Plan, Chapter 9: Conservation and Natural Resources Element, Figure 9.7: Scenic Highways Map, website: https://planning.lacounty.gov/generalplan/generalplan, accessed June 2021.

5 County of Los Angeles Department of Regional Planning, 2015, Los Angeles County General Plan, Chapter 9: Conservation and Natural Resources Element, Figure 9.9: Historic Resources Sites Policy Map, website: https://planning.lacounty.gov/generalplan/generalplan, accessed June 2021.

6 Office of Historic Preservation, California State Parks, California Historical Resources, website: http://ohp.parks.ca.gov/ListedResources/?view=county&criteria=19, accessed June 2021.

7 County of Los Angeles, Department of Regional Planning Commission, 2015, Los Angeles County General Plan, Chapter 9: Conservation and Natural Resources Element, website: https://planning.lacounty.gov/generalplan/generalplan, accessed June 2021.

surrounding area. With respect to building height, the structures in the Project Site vicinity range in height from one to three stories.

The Proposed Project would be comprised of a three-story residential building. The proposed building would include 49,156 gross square feet of development. Per the Willowbrook Community Standards District (CSD), the maximum height permitted in the R-3 zone is 35 feet and two stories. In exchange for providing an affordable housing set-aside, the housing development is eligible to request incentives to exceed the maximum height by six feet and an additional story, resulting in a maximum height of 41 feet and three stories. Surface parking would be provided at grade along the western and northern border of the Project Site. Building elevations and sections of the Proposed Project are depicted in Figure 11 through Figure 13. The Proposed Project would be designed to complement the surrounding neighborhood including the two- and three-story Mosaic Gardens Apartments to the south and other two- and three-story multi-family residential buildings within the project vicinity. The Proposed Project's architecture would be sensitive to the single-family residences immediately to the west by providing a 35-foot side yard setback and landscaping on the west side of the Project Site.

The Project Site is currently zoned R-1 (Single-Family Residence). The Applicant is requesting a Zone Change from R-1 to R-3 (Limited Density Multiple Residence). The Proposed Project would be consistent with all applicable development standards in the proposed R-3 zone. Additionally, the County's General Plan land use designation for the entire Project Site is H9 (Residential 0-9 du/net ac),[8] which would allow 0-9 dwelling units per net acre. Thus, the Applicant is proposing a General Plan Amendment from the existing General Plan land use designation to H30 (Residential: 0-30 du/net ac) for the Proposed Project, which allows for 0-30 dwelling units per net acre. The Proposed Project would be consistent with the proposed H30 General Plan land use designation. The Zone Change and the General Plan Amendment for the Proposed Project would also be consistent with adjacent multi-family land uses located to the south of the Project Site, specifically the Mosaic Gardens Apartments.

The Project Site is located in the Willowbrook Community Standards District (CSD) in the unincorporated area of the County. The Proposed Project would be consistent with all applicable regulations of the Willowbrook CSD, including maintaining exterior walls free from graffiti. The Proposed Project shall complement the building style of the surrounding area and meet development standards related to building heights, setbacks, parking, landscaping, tree planting, and bicycle storage spaces. The County shall review all plans for the Proposed Project to ensure consistency with the zoning code and General Plan. Accordingly, the following mitigation measure is recommended to reduce impacts associated with visual character to a less than significant level.

Mitigation Measures:

AES-1 Construction equipment, debris, and stockpiled equipment shall be enclosed within a fenced or visually screened area to effectively block the line of sight from the ground level of neighboring properties. Such barricades or enclosures shall be maintained in appearance throughout the construction period. Graffiti shall be removed within 24 hours of occurrence.

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[8] County of Los Angeles Department of Regional Planning, 2015, Los Angeles County General Plan 2035, Chapter 6: Land Use Element, website: https://planning.lacounty.gov/generalplan/generalplan, accessed June 2021.

e) Create a new source of substantial shadows, light, or glare which would adversely affect day or nighttime views in the area?	☐	☒	☐	☐

Shading impacts are influenced by the height and bulk of a structure, the time of year, the duration of shading during the day, and the sensitivity of the surrounding uses. The Project vicinity is characterized by multi- and single-family residences to the south, west and north, which would be considered shade sensitive uses. The Proposed Project would involve the construction of a three-story apartment complex (approximately 41 feet). At this height, and in combination with the proposed setbacks and configuration of the buildings on the Project Site, the Proposed Project would not be tall enough to create a new source of substantial shadows in the Project vicinity. Furthermore, the Proposed Project's three-story structure would be similar in height to the two- and three-story Mosaic Gardens Apartments to the south. Therefore, due to the Proposed Project's height and setbacks, and height of the surrounding land uses in the Project vicinity, the Proposed Project would not create a new source of substantial shadows and impacts associated with shadows would be less than significant.

A significant impact may occur if the Proposed Project introduces new sources of light or glare on or from the Project Site, which would be incompatible with the areas surrounding the Project Site, or which pose a safety hazard to motorists utilizing adjacent streets or freeways. The Project Site currently includes one developed parcel and two partially vacant parcels. The Project Site is bordered by single- and multi-family residential buildings to the west, south and north, across E. 126th Street, and S. Willowbrook Avenue to the east. As such, existing ambient light and glare in the Project vicinity is moderate and typical of an urban area. Additional sources of night lighting would be associated with the development of the Proposed Project. Night lighting for the Proposed Project would be provided to illuminate the building entrances, common open space areas, and parking areas. However, the Proposed Project would not generate a substantial increase in ambient lighting. Lighting fixtures for the Proposed Project would be directed towards the interior of the Project Site and away from any nearby land uses. Residents' interior lights would also create a minimal source of light; however, the residential lighting proposed would be similar to the amount of light generated by the single-family and multi-family residences located adjacent to the Project Site. With the implementation of project design feature PDF-1, stated in the Project Description Section of this IS/MND, the Proposed Project would not introduce any new sources of substantial light that are incompatible with the surrounding areas. Accordingly, the project design features would be implemented to ensure impacts associated with light would be less than significant.

Potential reflective surfaces in the Project Site vicinity include automobiles traveling and parked on local streets, exterior building windows, and surfaces of brightly painted buildings. Excessive glare not only restricts visibility but increases the ambient heat reflectivity in a given area. The Proposed Project would not contain large expanses of reflective or mirrored architectural materials. The Proposed Project would not introduce any new sources of substantial glare that are incompatible with the surrounding area. Additionally, the project design feature PDF-1, and mitigation measure AES-2, are recommended to reduce impacts associated with glare to a less than significant level.

Mitigation Measures:

AES-2 The exterior of the proposed structure shall be constructed of materials to minimize glare and reflected heat, such as, but not limited to, high-performance and/or non-reflective tinted glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces with non-reflective materials.

2. AGRICULTURE / FOREST

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒

No farmland or agricultural activity exists on or in the vicinity of the Project Site. The Project Site includes one developed parcel and two partially vacant parcels. The Proposed Project does not include the development of agricultural land and is located within an urban setting. According to the Soil Candidate Listing for Prime Farmland of Statewide Importance, Los Angeles County, which was prepared by the U.S. Department of Agriculture Natural Resources Conservation Service (NRCS), the soils at the Project Site are not candidates for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. In addition, the Project Site has not been mapped pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency.[9] Therefore, no impact to agricultural lands would occur.

b) Conflict with existing zoning for agricultural use, with a designated Agricultural Resource Area, or with a Williamson Act contract?	☐	☐	☐	☒

The Project Site is not located in an Agricultural Resource Area (ARA).[10] The Project Site is currently developed on one parcel and partially vacant on two parcels with no existing agricultural uses. The Project Site is zoned R-1 (Single-Family Residence) and the Applicant is proposing a zone change to R-3 (Limited Density Multiple Residence) to accommodate the Proposed Project. Neither the current zoning nor the proposed zoning is intended to provide for agricultural use. In addition, no Williamson Act Contracts are in effect for the Project Site.[11] There would be no expected impacts to existing zoning for agricultural use or a Williamson Act Contract resulting from the Proposed Project. Therefore, no impact would occur.

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9 California Department of Conservation, Farmland Mapping and Monitoring Program, website http://www.conservation.ca.gov/dlrp/FMMP/Pages/Index.aspx, accessed June 2021.

10 County of Los Angeles Department of Regional Planning, 2015, Los Angeles County General Plan, Chapter 9: Conservation and Natural Resources Element, Figure 9.5: Agricultural Resource Areas Policy Map, website: https://planning.lacounty.gov/generalplan/generalplan, accessed June 2021.

11 Williamson Act Program, California Division of Land Resource Protection, website: https://www.conservation.ca.gov/dlrp/wa, accessed June 2021.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code § 12220 (g)), timberland (as defined in Public Resources Code § 4526), or timberland zoned Timberland Production (as defined in Government Code § 51104(g))? ☐ ☐ ☐ ☒

The Project Site is not within forest land or timberland. The proposed Zone Change and General Plan Amendment for the Proposed Project would not result in a zone or land use designated for forest land or timberland. There is no Timberland Production at the Project Site. The surrounding area is not zoned for forest land or timberland. Therefore, no impact would occur.

d) Result in the loss of forest land or conversion of forest land to non-forest use? ☐ ☐ ☐ ☒

The Project Site includes development on one parcel and two partially vacant parcels, with no timberland or forest resources present or related activities occurring on-site. The Project Site and the surrounding area are in an urban setting. The Proposed Project would not result in the loss of forest land or conversion of forest land to non-forest use, as there is no forest land on or immediately adjacent to the Project Site. Therefore, no impact would occur.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? ☐ ☐ ☐ ☒

The Project Site includes development on one parcel and two partially vacant parcels and is not currently utilized for agricultural or forestry uses. The Project Site is not classified in any "Farmland" category designated by the State of California.[12] The Project Site is not located near, or in, any significant farmland area (i.e., a significant commercial crop or animal producing site). The adjacent land uses and surrounding area are not utilized for agricultural or forestry uses, nor are they classified as "Farmland." Therefore, no impact would occur.

[12] California Department of Conservation, Farmland Mapping and Monitoring Program, website http://www.conservation.ca.gov/dlrp/FMMP/Pages/Index.aspx, accessed June 2021.

3. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project:				
a) Conflict with or obstruct implementation of applicable air quality plans of either the South Coast AQMD (SCAQMD) or the Antelope Valley AQMD (AVAQMD)?	☐	☐	☒	☐

A significant air quality impact would occur if a project were not consistent with the SCAQMD's 2016 Air Quality Management Plan (AQMP) or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of these plans. The 2016 AQMP was prepared to comply with the federal and State Clean Air Acts and amendments, to accommodate growth, to reduce the high levels of pollutants in the Basin, to meet federal and state air quality standards, and to minimize the fiscal impact that pollution control measures have on the local economy. The 2016 AQMP is based in part on demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment by industry), developed by SCAG for the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS). Because the 2016-2040 RTP/SCS is based on the General Plan growth projections of the local municipalities within the Basin, projects that are consistent with the projections of employment and population forecasts identified in their respective General Plans are considered to be consistent with the AQMP. Projects that are not consistent with the local General Plan and/or involve Plan Amendments for higher densities must be analyzed for consistency with the AQMP. As provided in Section 12.3 of the SCAQMD's CEQA Air Quality Handbook (1993), the two specific criteria for determining a project's consistency with the AQMP are as follows:

- *Consistency Criteria 1.* Whether the project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
- *Consistency Criteria 2.* Whether the project will exceed the assumptions in the AQMP, or increments based on the year of project build-out and phase (Table 12-2 [of the AQMP]).[13]

Under Consistency Criteria 1, in order to determine whether the Proposed Project would result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, the Proposed Project's construction and operational air quality emissions were quantified utilizing the California Emissions Estimator Model (CalEEMod.2016.3.2), as recommended by the SCAQMD. The estimated emissions for both construction and operation were then compared to the applicable SCAQMD's significance thresholds for regional air quality impacts. As discussed in greater detail below (see response to Checklist Question 3(b), the Proposed Project's construction and operational emissions would be well below the thresholds of significance for the six criteria pollutants monitored by the SCAQMD. Thus, the Proposed

[13] For residential projects, the key assumptions identified in Table 12-2 include population number and location and Regional Housing Needs Assessment.

Project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP. As such, the Proposed Project would be consistent with the AQMP under Criteria 1.

The Proposed Project includes a total of 51 housing units with a maximum population of 153 persons assuming an occupancy rate of 3 persons per unit.[14] On September 3, 2020, SCAG Regional Council adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, also known as Connect SoCal.[15] As discussed in further detail in Section 14. Population and Housing, the Proposed Project would not exceed the growth projections of SCAG's Connect SoCal for the unincorporated areas of the Los Angeles County subregion. For these reasons, the Proposed Project is consistent with the AQMP under Consistency Criteria 2.

Based on the above, the Proposed Project would not conflict with or obstruct implementation of the adopted AQMP, and Proposed Project impacts would be considered less than significant.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐

A significant impact may occur if a project adds a considerable cumulative contribution to federal or State non-attainment pollutants. As the Basin is currently in State non-attainment for O_3 (ozone), PM_{10} (respirable particulate matter) and $PM_{2.5}$ (fine particulate matter), related projects could exceed an air quality standard or contribute to an existing or projected air quality exceedance. With respect to determining the significance of a project's contribution of emissions, the SCAQMD neither recommends quantified analyses of construction and/or operational emissions from multiple development projects nor provides methodologies or thresholds of significance to be used to assess the cumulative emissions generated by multiple cumulative projects. Instead, the SCAQMD recommends that a project's potential contribution to cumulative impacts be assessed utilizing the same significance criteria as those for project specific impacts.[16] Thus, a project may result in a significant impact in cases where project-related emissions would exceed federal, State, or regional standards or thresholds, or where project-related emissions would substantially contribute to an existing or projected air quality violation. Furthermore, SCAQMD states that if an individual development project generates less than significant construction or operational emissions, then the development project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment.

A project would conflict with the applicable AQMP if the project were to exceed the adopted thresholds of significance as adopted by the SCAQMD. The following analysis discusses and quantifies the Proposed Project's construction and operational air quality emissions and addresses the Proposed Project's consistency with the SCAQMD's construction and operational thresholds of significance.

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14 SCAG, Connect SoCal, Demographics and Growth Forecast Appendix, adopted September 2020.

15 Southern California Association of Governments, Connect SoCal: The 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy, September 3, 2020, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176. Accessed June 2021.

16 SCAQMD, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution. Appendix D, South Coast Air Quality Management District, August 2003.

Construction Impacts

The Proposed Project's construction activities would generate emissions of dusts, fumes, equipment exhaust, and other air contaminants on a temporary and intermittent basis during an approximate 21-month construction period. Mobile sources such as the use of diesel-fueled equipment onsite and vehicles traveling to and from the Project Site would primarily generate NO_X emissions. The application of architectural coatings would primarily generate VOC/ROG emissions. The amount of emissions generated on a daily basis would vary, depending on the amount and types of construction equipment and intensity of activities occurring.

Construction activities associated with the Proposed Project would be undertaken in four main steps: (1) demolition/site clearing, (2) grading/foundations, (3) building construction, and (4) finishing (architectural coatings). These construction activities would temporarily create emissions of dusts, fumes, equipment exhaust, and other air contaminants. The amount of emissions generated on a daily basis would vary, depending on the phase and intensity of construction activities occurring at the same time. Due to the construction time frame and the normal day-to-day variability in construction activities, it is difficult, if not impossible, to precisely quantify the maximum daily emissions associated with each phase of the proposed construction activities. Nonetheless, Table 4, Maximum Daily Construction Emissions, identifies a conservative estimate of daily emissions that are estimated to occur on peak construction days for each construction phase.

Table 4
Maximum Daily Construction Emissions

Emissions Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Demolition/Site Clearing	1.52	14.35	13.88	0.02	0.91	0.69
Grading/Foundations	1.17	16.39	8.06	0.04	3.59	1.79
Building Construction	2.11	16.15	19.10	0.03	1.22	0.81
Architectural Finishing	5.52	5.95	9.67	0.02	0.35	0.28
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**

Note: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust.
CalEEMod sheets are provided in Appendix A to this IS/MND.

The calculations presented in Table 4 assume that appropriate dust control measures would be implemented as part of the Proposed Project during each phase of development, as required by SCAQMD Rule 403 - Fugitive Dust. Specific Rule 403 control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site, and maintaining effective cover over exposed areas. Compliance with these applicable rules would ensure local and regional construction-related air quality impacts are less than significant.

As shown in Table 4, above, the Proposed Project's construction-related maximum daily emissions would be below the SCAQMD's significance thresholds for all six criteria pollutants during each construction phases. Therefore, with regulatory compliance construction impacts would be less than significant.

Operational Impacts

The Project Site is currently developed with a child development center and associated surface parking. The existing use generates air pollutant emissions from stationary sources, such as space and water heating, architectural coatings (paint), and mobile vehicle traffic traveling to and from the Project Site. The peak daily emissions generated by the existing uses at the Project Site were estimated utilizing the California Emissions Estimator Model (CalEEMod.2016.3.2). Existing emissions were subtracted from the Proposed Project's operational emissions to estimate the net emissions from the Project Site.

The Proposed Project's operational emissions would be generated by both stationary and mobile sources associated with the day-to-day activities of 51 new residential units. Area source emissions would be generated by the consumption of natural gas and landscape maintenance. Mobile emissions would be generated by the motor vehicles traveling to and from the Project Site. The results of the estimated operational emissions are presented in Table 5, Maximum Daily Operational Emissions. As shown in Table 5, the operational emissions generated by the Proposed Project would not exceed the regional thresholds of significance set by the SCAQMD for any of the six criteria pollutants analyzed. Therefore, impacts associated with regional operational emissions from the Proposed Project would be less than significant. As shown below, the Proposed Project would not generate construction or operational emissions that exceed the SCAQMD recommended daily thresholds for project-specific impacts and would not cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment. Impacts would be less than significant.

Table 5
Maximum Daily Operational Emissions

Emissions Source	Emissions in Pounds per Day					
	ROG	**NO_x**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Summertime (Smog Season) Emissions						
Area	1.19	0.05	4.21	<0.01	0.02	0.02
Energy	0.02	0.21	0.09	<0.01	0.02	0.02
Mobile	0.55	2.48	7.44	0.03	2.67	0.73
Stationary	0.82	3.67	2.09	<0.01	0.12	0.12
Total Project Emissions:	**2.58**	**6.41**	**13.83**	**0.03**	**2.83**	**0.89**
Less Existing Emissions:	*(0.53)*	*(1.98)*	*(3.98)*	*(0.01)*	*(0.97)*	*(0.27)*
Net Total Emissions:	**2.05**	**4.43**	**9.85**	**0.02**	**1.86**	**0.62**
SCAQMD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Potentially Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**
Wintertime (Non-Smog Season) Emissions						
Area	1.19	0.05	4.21	<0.01	0.02	0.02
Energy	0.02	0.21	0.09	<0.01	0.02	0.02
Mobile	0.52	2.53	6.92	0.03	2.67	0.73
Stationary	0.82	3.67	2.09	<0.01	0.12	0.12
Total Project Emissions:	**2.55**	**6.46**	**13.31**	**0.03**	**2.83**	**0.89**
Less Existing Emissions:	*(0.51)*	*(1.98)*	*(3.90)*	*(0.01)*	*(0.97)*	*(0.27)*
Net Total Emissions:	**2.04**	**4.48**	**9.41**	**0.02**	**1.86**	**0.62**
SCAQMD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Potentially Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**
Note: CalEEMod worksheets are provided in Appendix A to this IS/MND.						

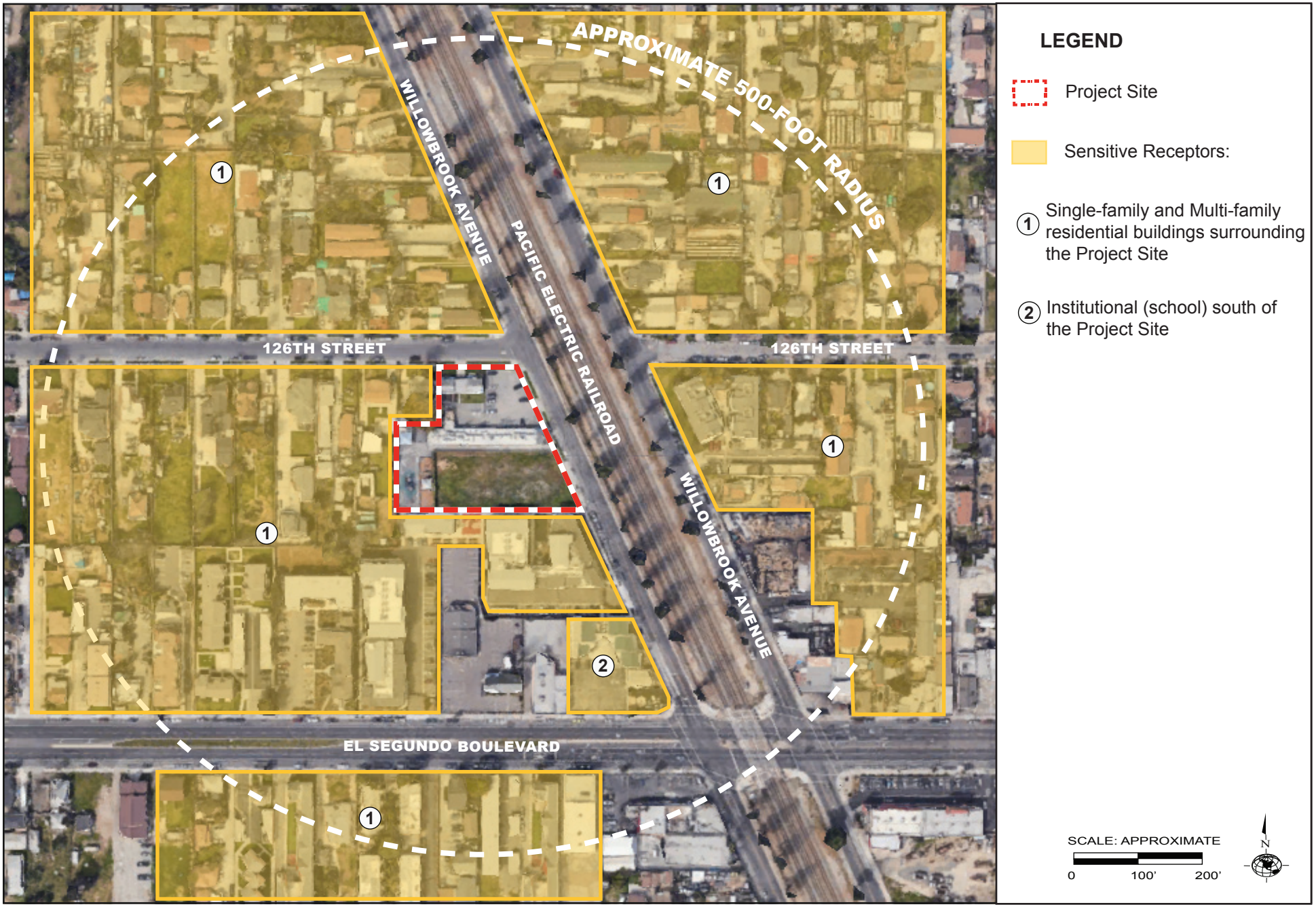
c) Expose sensitive receptors to substantial pollutant concentrations? ☐ ☐ ☒ ☐

A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. Sensitive receptors are populations that are more susceptible to the effects of air pollution than are the population at large. The SCAQMD identifies the following as sensitive receptors: long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, childcare centers, and athletic facilities.[17] For purposes of this analysis, the single-family and multi-family residences surrounding the Project Site within 500 feet and the institutional school fronting El Segundo Boulevard, are thus identified as sensitive receptors (see Figure 15, Air Quality Sensitive Receptors). As noted in response 3(b) above, the Proposed Project's air quality impacts would be well under the SCAQMD's adopted thresholds of significance for construction and operational emissions, respectively. Thus, the Proposed Project would result in a less than significant impact with respect to exposing potential sensitive receptors to substantial pollutant concentrations. Construction activities associated with the Proposed Project would be typical of other development projects in Los Angeles County, City of Compton, and City of Lynwood, and would be subject to the regulations and laws relating to toxic air pollutants at the regional, State, and federal level that would protect sensitive receptors from substantial concentrations of these emissions. As the Proposed Project consists of 51 housing units, operation of the Proposed Project would not include any land uses requiring the use, storage, or processing of carcinogenic or non-carcinogenic toxic air contaminants and no toxic airborne emissions would typically result from Proposed Project implementation. Therefore, impacts associated with the release of substantial pollutants during construction and operation would be less than significant.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? ☐ ☐ ☒ ☐

A significant impact may occur if objectionable odors occur which would adversely impact sensitive receptors. Odors are typically associated with industrial projects involving the manufacturing or use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. The Proposed Project is a residential development project and involves no elements related to the types of activities mentioned above, and no odors from these types of uses are anticipated. Garbage collection areas for the Proposed Project would be covered and situated away from the property line and nearby sensitive uses. Good housekeeping practices would be sufficient to prevent nuisance odors. In addition, SCAQMD Rule 402 (Nuisance) states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. Compliance with Rule 402 would limit potential objectionable odor impacts during the Proposed Project's long-term operations phase. Therefore, potential operational odor impacts would be less than significant.

[17] South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993, page 5-1.



Source: Google Earth, Aerial View, 2021.

PARKER ENVIRONMENTAL CONSULTANTS

Figure 15
Air Quality Sensitive Receptors

4. BIOLOGICAL RESOURCES

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?	☐	☒	☐	☐

The Project Site is located within an urbanized area of the County within the community of Willowbrook. The Project Site is not located within a County designated Significant Ecological Area (SEA).[18] The Project Site is partially developed with a child development facility and surface parking and two partially vacant parcels. The Project Site vegetation is limited to ornamental landscaping, grass, and non-native ruderal species. As such, the Project Site is largely devoid of habitat that would support special status species.

Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). Construction-related activities that occur during the breeding season of species protected by the MBTA or Fish and Game Code may result in take of active bird nests. Such activities may include removal of exiting vegetation and structures. Therefore, Mitigation Measure BIO-1 is recommended to reduce this potential impact to a less than significant level.

Mitigation Measures:

BIO-1: Proposed project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) shall occur outside of the avian breeding season which generally runs from February 1-August 31 (as early as January 1 for some raptors) to avoid take of birds or their eggs. Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86), and includes take of eggs and/or young resulting from disturbances which cause abandonment of active nests. Depending on the avian species present, a qualified biologist may determine that a change in the breeding season dates is warranted.

If avoidance of the avian breeding season is not feasible, beginning thirty days prior to the initiation of project activities, a qualified biologist (as determined by Los Angeles County) with experience in conducting breeding bird surveys shall conduct weekly bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of project activities. If a protected native bird is found, the project proponent shall delay all project activities within 300 feet of on- and off-site suitable

[18] County of Los Angeles Department of Regional Planning, 2015, Los Angeles County General Plan, Chapter 9: Conservation and Natural Resources Element, Figure 9.3: Significant Ecological Areas and Coastal Resource Areas Policy Map, website: https://planning.lacounty.gov/generalplan/generalplan, accessed June 2021.

nesting habitat (within 500 feet for suitable raptor nesting habitat) until August 31. Alternatively, the qualified biologist could continue the surveys in order to locate any nests. If an active nest is located, project activities within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, must be postponed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. Flagging, stakes, and/or construction fencing shall be used to demarcate the inside boundary of the buffer of 300 feet (or 500 feet) between the project activities and the nest. Project personnel, including all contractors working on site, shall be instructed on the sensitivity of the area. If requested, the project proponent shall provide Los Angeles County the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds.

If the biological monitor determines that a narrower buffer between the project activities and observed active nests is warranted, he/she shall submit a written explanation as to why (*e.g.*, species-specific information; ambient conditions and birds' habituation to them; and the terrain, vegetation, and birds' lines of sight between the project activities and the nest and foraging areas) to Los Angeles County and, upon request, the California Department of Fish and Wildlife (CDFW). Based on the submitted information, Los Angeles County (and CDFW, if CDFW requests) will determine whether to allow a narrower buffer.

The biological monitor shall be present on site during all grubbing and clearing of vegetation to ensure that these activities remain within the project footprint (*i.e.*, outside the demarcated buffer) and that the flagging/stakes/fencing is being maintained, and to minimize the likelihood that active nests are abandoned or fail due to project activities. The biological monitor shall send weekly monitoring reports to Los Angeles County during the grubbing and clearing of vegetation and shall notify Los Angeles County immediately if project activities damage active avian nests.

b) Have a substantial adverse effect on any sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, non-jurisdictional wetlands) identified in local or regional plans, policies, regulations or by CDFW or USFWS?	☐	☐	☐	☒

The Project Site includes one developed parcel and two partially vacant parcels. No riparian or other sensitive natural community is located on or adjacent to the Project Site.[19] Existing vegetation on or near the Project Site includes existing landscaping and other non-sensitive ruderal vegetation. The Proposed Project would not have a substantial adverse effect on any sensitive natural communities. Therefore, no impact would occur.

19 Ibid.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means?

☐ ☐ ☐ ☒

The Project Site does not contain any streams, ponds, sumps, or other water bodies. Additionally, the Project Site does not support a wetland habitat.[20] The Proposed Project would not have a substantial adverse effect on federally or state protected wetlands or waters of the United States. Therefore, no impact would occur.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

☐ ☒ ☐ ☐

Wildlife nursery sites include active nests of breeding birds. In addition, migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). Compliance with these laws will reduce impacts to nesting birds to a less than significant level. Implementation of Mitigation Measure BIO-1 would reduce impacts upon native resident or migratory birds or wildlife species and impacts to wildlife nursery sites to a less than significant level.

e) Convert oak woodlands (as defined by the state, oak woodlands are oak stands with greater than 10% canopy cover with oaks at least 5 inch in diameter measured at 4.5 feet above mean natural grade) or other unique native woodlands (juniper, Joshua, southern California black walnut, etc.)?

☐ ☐ ☐ ☒

The Project Site does not contain any oak woodlands, oak trees, or other unique native trees. The vegetation on the Project Site predominately consists of non-native ruderal grasses, shrubs and weeds, and ornamental species. The Proposed Project would not result in the removal of any existing trees. Therefore, no impact would occur.

[20] U.S. Fish and Wildlife Services, National Wetlands Inventory, Wetlands Mapper, website: https://www.fws.gov/wetlands/data/mapper.html, accessed June 2021.

f) Conflict with any local policies or ordinances protecting biological resources, including Wildflower Reserve Areas (L.A. County Code, Title 12, Ch. 12.36), the Los Angeles County Oak Tree Ordinance (L.A. County Code, Title 22, Ch. 22.174), the Significant Ecological Areas (SEAs) (L.A. County Code, Title 22, Ch. 102), Specific Plans (L.A. County Code, Title 22, Ch. 22.46), Community Standards Districts (L.A. County Code, Title 22, Ch. 22.300 et seq.), and/or Coastal Resource Areas (L.A. County General Plan, Figure 9.3)? ☐ ☐ ☐ ☒

Vegetation on the Project Site is limited to existing landscaping and ruderal non-native species. The Project Site is not located within a County SEA or Coastal Resource Area.[21] The Proposed Project would not conflict with any local policies or ordinances protecting biological resources. Therefore, no impact would occur.

g) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved state, regional, or local habitat conservation plan? ☐ ☐ ☐ ☒

Vegetation on the Project Site consists of landscaping and ruderal non-native species. The Project Site is not located within an area governed by an adopted state, regional, or local habitat conservation plan. The Proposed Project would not conflict with any habitat conservation plans. Therefore, no impact would occur.

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[21] County of Los Angeles Department of Regional Planning, 2015, Los Angeles County General Plan, Chapter 9: Conservation and Natural Resources Element, Figure 9.3: Significant Ecological Areas and Coastal Resource Areas Policy Map, website: https://planning.lacounty.gov/generalplan/generalplan, accessed June 2021.

5. CULTURAL RESOURCES

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines § 15064.5?	☐	☐	☐	☒

The Project Site includes one developed parcel and two partially vacant parcels. The developed parcel (APN 6152-002-021) is currently occupied by a child development center consisting of three one-story buildings and associated surface parking. The Proposed Project would include the demolition of the existing buildings. According to the Phase I ESA (See Appendix C), the existing buildings were constructed in 1963, but are not designated as a historic resource.[22,23] As discussed in the Phase I ESA, the existing buildings were used as a school from the 1990's through the 2020's. Prior, in the 1970's, the buildings were used as a church. No listed historic resources would be impacted by the redevelopment of the Project Site. The Proposed Project would not cause a substantial adverse change in the significance of a historical resource. Therefore, no impact would occur.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines § 15064.5?	☐	☒	☐	☐

The Project Site and the surrounding properties are located in an urbanized area that has been previously developed and disturbed by past activities. Based on the Project Site's past commercial and institutional uses and disturbance of soil, development of the Proposed Project would not directly or indirectly destroy an archaeological resource. The Proposed Project is not expected to disturb any archaeological resources during construction of the Proposed Project, as minimal ground excavation would occur. No significant below grade excavation would occur during construction other than to a modest depth (less than 5 feet below existing grade) for site clearing, grading, and building foundation preparation. Nonetheless, there is still a possibility that construction of development on-site could encounter previously unknown and unrecorded resources, if any should exist below grade. Because the presence or absence of such materials cannot be determined until earthwork activities begin, the Proposed Project shall adhere to Mitigation Measure CUL-1 for proper handling of any archaeological resources inadvertently discovered during construction, and TCR-1 (Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities) and TCR-2 (Discovery of Tribal Cultural Resources (TCR), Human Remains, and/or Grave Goods), as further discussed in Section 18. Tribal Cultural Resources. As the Proposed Project would be required to comply with all applicable regulations for archaeological resources, including but not limited to, PRC Section 21083.2, and mitigation, impacts would be less than significant.

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22 County of Los Angeles Department of Regional Planning, 2015, Los Angeles County General Plan, Chapter 9: Conservation and Natural Resources Element, Figure 9.9: Historic Resources Sites Policy Map, website: https://planning.lacounty.gov/generalplan/generalplan, accessed June 2021.

23 Office of Historic Preservation, California State Parks, California Historical Resources, website: http://ohp.parks.ca.gov/ListedResources/?view=county&criteria=19, accessed June 2021.

Mitigation Measures:

CUL-1: If any archaeological materials are encountered during excavation, grading, or construction activities, all further construction activity shall halt in the area of the discovery (not less than 25 feet) and the services of a County-certified archaeologist shall then be secured who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The archaeologist's survey, study or report shall contain recommendations, if necessary, for the preservation, conservation, or relocation of the resource in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083. The Applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study or report to the satisfaction of the Department of Regional Planning.

c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? ☐ ☒ ☐ ☐

The Project Site and the surrounding properties are located in an urbanized area that has been previously developed and disturbed by past activities. As such, the Project Site is not known to have significant unique paleontological or geological features and would not directly or indirectly destroy a unique paleontological resource.[24] The Proposed Project is not expected to disturb any paleontological resources during construction of the Proposed Project, as minimal ground excavation would occur. No significant below grade excavation would occur during construction other than to a modest depth for site clearing, grading, and building foundation preparation (approximately 5 feet below surface). In the event that paleontological resources are encountered during construction activities, the Proposed Project would be required to comply with all applicable procedures and regulations regarding the inadvertent discovery of paleontological resources. Compliance with Mitigation CUL-2 would ensure that impacts would be less than significant.

Mitigation Measures:

CUL:-2: If paleontological resources are discovered during excavation, grading, or construction, the Los Angeles County Department of Public Works (LACDPW) Building and Safety, shall be notified immediately, and all work construction shall cease in the area of the find (not less than 25 feet) until a County-certified p qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project Site in compliance with the applicable procedures and regulations. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. Found deposits shall be treated in accordance with federal, State, and local guidelines. The Applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study or report to the satisfaction of the Department of Regional Planning.

d) Disturb any human remains, including those interred outside of dedicated cemeteries? ☐ ☒ ☐ ☐

No cemeteries are located in the immediate vicinity of the Project Site. The nearest cemetery is Lincoln Memorial Park Cemetery located approximately 4 miles south of the Project Site. At this distance, the

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[24] County of Los Angeles Department of Regional Planning, 2015, Los Angeles County General Plan, Chapter 9: Conservation and Natural Resources Element, Table 9.9: Significant General Fossil Localities in Los Angeles County, website: https://planning.lacounty.gov/generalplan/generalplan, accessed June 2021.

Proposed Project would not disturb any human remains at Lincoln Memorial Park Cemetery. The Project Site is not part of a formal cemetery and not known to have been used for disposal of historic or prehistoric remains. In addition, the Project Site does not contain any sacred structures. It is unlikely that human remains would be encountered during grading and excavation of the Proposed Project. The Proposed Project is not anticipated to disturb any remains including those interred outside of formal cemeteries. However, it is possible that unknown human remains could occur on the Proposed Project Site, and if proper care is not taken during construction, damage to or destruction of these unknown remains could occur. As such, with adherence to State Health and Safety Code Section 7050.5, California Public Resources Code (PRC) Section 5097.98 and mitigation measure TCR -2 (Discovery of Tribal Cultural Resources, Human Remains, and/or Grave Goods, as further discussed in Section 18. Tribal Cultural Resources, impacts would be less than significant.

6. ENERGY

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐

Construction

Energy would be consumed during the demolition, grading, construction, and finishing phases of the Proposed Project by heavy-duty equipment, which is usually diesel powered. Construction of the Proposed Project would require the export of asphalt and building debris from the Project Site during the demolition and site clearing phase. Additionally, up to 5,000 cubic yards of soil would be exported as a result of grading the Project Site for building foundations. Construction worker travel to and from the Project Site would result in the additional consumption of vehicular unleaded gasoline fuel during the construction period. Due to the relatively short duration of the construction process, and the fact that the extent of fuel consumption is inherent to construction projects of this size and nature, fuel consumption impacts would not be considered excessive or substantial with respect to regional fuel supplies. Further, compliance with regulatory compliance measures, such as restricting haul trucks to off-peak hours and not allowing engines to idle excessively when not in use (AQMD Rule 403) and meeting specified fuel and fuel additive requirements and emission standards (C.C.R. Title 13, Sec. 2485), would further serve to increase energy efficiency and reduce consumption of fossil fuels. The energy demands during construction would be typical of construction projects of this size and would not necessitate additional energy facilities or distribution infrastructure or cause wasteful, inefficient, or unnecessary consumption of energy. Accordingly, energy demands during construction would be less than significant.

Operation

Electricity

Implementation of code compliance measures would ensure the Proposed Project meets the minimum California Title 24 and Los Angeles County Green Building Standards Code (CGBSC) energy efficiency requirements and further reduce demand for electricity, including peak power demands. Specifically, the Proposed Project would include energy efficient lighting fixtures, low-flow water features, and energy efficient mechanical heating and ventilation systems. Additionally, Southern California Edison would confirm the availability of electric service connections for the Proposed Project. Therefore, the development of the Proposed Project would not cause wasteful, inefficient, or unnecessary consumption of electricity.

Natural Gas

As discussed above, the Proposed Project would be required to comply with energy conservation standards pursuant to Title 24 of the California Administrative Code. The Proposed Project would also be required to comply with the CGBSC, which requires the use of numerous conservation measures. The cool roof standards and water conservation features would further reduce demands upon building heating and cooling. Therefore, compliance with Title 24 of the California Administrative Code and the CGBSC would reduce the Proposed

Project's energy consumption and natural gas demand. Therefore, the development of the Proposed Project would not cause wasteful, inefficient, or unnecessary consumption of natural gas.

Transportation Energy

Operation of the Proposed Project would generate vehicle trips associated with people driving to and from the Project Site for work, home, or other destinations throughout the region. The Proposed Project would include several conservation measures to decrease reliance on fossil fuels, including coal, natural gas and oil. Public transportation within the vicinity of the Project Site consists primarily of multiple-stop, local-serving bus lines that provide access to shopping, business, and entertainment destinations in the Project vicinity, as well as some regional/commuter public transit opportunities. Bus lines that operate in the Project Site area are served by Metro and LACDPW Transit (The Link-Willowbrook). The Proposed Project is an infill development and would construct an affordable housing development. Because of the Project Site's location near transit service, a number of trips would be expected to be transit or walk trips rather than vehicle trips. Some residents and visitors would take transit to their destinations or would walk to destinations nearby. As such, a reduction in vehicle trips and vehicle miles traveled (VMT) would decrease the Proposed Project's reliance on fossil fuels. The CGBSC does not require the incorporation of electric vehicle charging stations (EVCS) for affordable housing projects. However, the number of required EV spaces capable of supporting future EVSE is permitted to be calculated as ten (10) percent of the number of parking spaces provided.[25] As such 3 parking spaces capable of supporting future EVSE will be provided, out of 23 total parking spaces. The provision of EV-capable infrastructure would further serve to promote the utilization of alternative fueled vehicles, thus reducing the combustion of fossil fuels. Based on these factors, the Proposed Project's vehicle trips would decrease overall per capita energy consumption, decrease reliance on fossil fuels, and would serve to promote reliance on renewable energy sources. As such, the development of the Proposed Project would not cause wasteful, inefficient or unnecessary consumption of fossil fuels and would promote walking, biking, and other modes of public transportation. Therefore, with incorporation of the features identified above, the Proposed Project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation, and impacts would be less than significant.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? ☐ ☐ ☒ ☐

The Proposed Project would be required to comply with the Los Angeles County Green Building Standards Code (CGBSC) and California Green Building Standards Code (CALGreen Code or CGBSC) of Title 24 of the California Code of Regulations. The CGBSC is based on the 2019 California Green Building Standards Code, which addresses green buildings, low-impact development, and landscape design, pursuant to Title 31 of the Los Angeles County Code. These standards require applicable projects to comply with energy saving building standards. CALGreen's mandatory measures establish a minimum for green construction practices. Project specific CGBSC compliance measures will be noted in the Proposed Project's architectural plans. As stated above, the Proposed Project would not result in a wasteful, inefficient, or unnecessary consumption of energy resources. The Proposed Project's 51 housing units represents a minimal amount of the County's energy demand and does not conflict with a state or local plan for renewable energy or energy efficiency. Given the Proposed Project incorporates the principles of sustainability and green design, and efficient energy consumption measures required by the County Green Building Standards Code and CALGreen, the Proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and impacts would be less than significant.

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25 Los Angeles County Green Building Standards Code, Section 4.106.4.2 - New multifamily dwellings.

7. GEOLOGY AND SOILS

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known active fault trace? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐

The Project Site is located within a seismically active region, as is all of southern California. According to the State of California Department of Conservation, the Project Site is not located within an Alquist-Priolo earthquake fault zone.[26] The nearest fault line to the Project Site is the Inglewood fault line, which extends in a north-south direction, and is located approximately two miles west of the Project Site. As such, development of the Proposed Project would not have the potential to exacerbate surface rupture conditions. In addition, the Applicant would be required to incorporate project design elements consistent with the Office of Statewide Health Planning and Development, California Building Code (CBC), Uniform Building Code (UBC), or other required standards to further reduce any potential for impacts resulting from strong seismic ground shaking. Accordingly, the Proposed Project shall conform to measures as required by the County to ensure compliance throughout the construction and development of the Proposed Project, which would reduce impacts associated with rupture of a known earthquake fault to a less than significant level.

ii) Strong seismic ground shaking?	☐	☐	☒	☐

The Project Site is located within a seismically active region, as is all of southern California. According to the State of California Department of Conservation, the nearest fault line to the Project Site is the Inglewood fault line, which extends in a north-south direction approximately two miles west of the Project Site.[27] The Applicant would be required to incorporate project design elements consistent with the Office of Statewide Health Planning and Development, CBC, UBC, or other required standards to further reduce any potential for impacts resulting from strong seismic ground shaking. Accordingly, the Proposed Project shall conform to measures required by the County to ensure compliance throughout the construction and development of the Proposed Project, which would reduce impacts associated with seismic ground shaking to a less than significant level.

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26 California Department of Conservation, California Earthquake Hazards Zone Application, website: https://maps.conservation.ca.gov/cgs/EQZApp/app/, accessed June 2021.

27 Ibid.

iii) Seismic-related ground failure, including liquefaction and lateral spreading? ☐ ☐ ☒ ☐

Liquefaction is a process by which water saturated granular soils transform from a solid to a liquid state during strong ground shaking. According to the State of California Department of Conservation, the Project Site is located within a liquefaction zone.[28] As noted in the Phase I ESA (See Appendix C), the ground water depth is approximately 40 feet below the ground surface and the flow direction is to the southeast. The soil at the Project Site consists of Silty Sandy Clay to approximately 25 feet below existing grade. The Applicant would be required to incorporate project design elements consistent with the Office of Statewide Health Planning and Development, CBC, UBC, or other required standards to further reduce any potential for impacts resulting from liquefaction. Accordingly, the Proposed Project shall conform to measures required by the County to ensure compliance throughout the construction and development of the Proposed Project, which would reduce impacts associated with liquefaction to a less than significant level.

iv) Landslides? ☐ ☐ ☐ ☒

According to the State of California Department of Conservation, the Project Site is not located within an area identified as having a potential for seismic slope instability.[29] The potential for a landslide is not considered to be a hazard to the Project Site because the Project Site and the surrounding area are relatively flat. As such, no landslides are likely to occur at the Project Site or in the surrounding area. Therefore, no impact would occur.

b) Result in substantial soil erosion or the loss of topsoil? ☐ ☐ ☒ ☐

Although development of the Proposed Project has the potential to result in the erosion of soils during site preparation and construction activities, erosion would be reduced by implementation of erosion controls and best management practices (BMPs) to meet the National Pollutant Discharge Elimination System (NPDES) requirements for storm water quality and be consistent with guidelines provided in the *California Storm Water Best Management Practice Handbooks: Construction*.[30] Specifically, a Storm Water Pollution Prevention Plan (SWPPP) would be required to mitigate the effects of erosion and the inherent potential for sedimentation and other pollutants entering the stormwater system. Implementation of the BMPs identified in the SWPPP and compliance with the NPDES discharge requirements would be anticipated to mitigate soil erosion during construction. Due to regulatory compliance standards, the construction contractor shall implement BMPs consistent with the guidelines provided in the *California Storm Water Best Management Practice Handbooks: Construction* as well as project design elements consistent with the Office of Statewide Health Planning and Development, CBC, UBC, or other required standards to further reduce any potential for substantial soil erosion. With compliance of the Los Angeles County Building Code and any conditions that may be imposed by the County to ensure compliance throughout the construction and development of the Proposed Project, impacts with respect to soil erosion or loss of topsoil would be reduced to a less than significant level.

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28 Ibid.

29 Ibid.

30 California Stormwater Quality Association, California Stormwater Best Management Practice Handbooks: Construction, website: https://www.casqa.org/resources/bmp-handbooks, accessed June 2021.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? ☐ ☐ ☒ ☐

As discussed above in question (a)(iii), according to the State of California Department of Conservation, the Project Site is located within a liquefaction zone. The Project Site is not located within a landslide zone.[31] As noted in the Phase I ESA (See Appendix C), the ground water depth is approximately 40 feet below the ground surface and the flow direction is to the southeast. The soil at the subject site consists of Silty Sandy Clay to approximately 25 feet below existing grade. The Proposed Project would be developed at grade and does not propose any deep excavations. Grading and soil recompaction for the site development and building foundations is anticipated to be no more than 5 feet below grade level. The Applicant would be required to incorporate project design elements consistent with the Office of Statewide Health Planning and Development, CBC, UBC, or other required standards to further reduce any potential for impacts resulting from liquefaction. Accordingly, the Proposed Project shall conform to measures required by the County to ensure compliance throughout the construction and development of the Proposed Project, which would reduce impacts associated with liquefaction to a less than significant level.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property? ☐ ☐ ☒ ☐

Expansive soils contain significant amounts of clay particles that swell considerably when wetted and shrink when dried. Foundations constructed on these soils are subject to uplifting forces caused by the swelling. Without proper mitigation measures, heaving and cracking of both building foundations and slabs-on-grade could result. The soil at the Project Site consists of Silty Sandy Clay to approximately 25 feet below existing grade.[32] To the extent that soils at the Project Site create adverse impacts due to expansion, the Applicant would be required to incorporate project design elements consistent with the Office of Statewide Health Planning and Development, CBC, UBC, or other required standards to further reduce any potential for impacts resulting from expansive soils. Accordingly, the Proposed Project shall conform to measures required by the County to ensure compliance throughout the construction and development of the Proposed Project, which would reduce impacts associated with expansive soils to a less than significant level.

e) Have soils incapable of adequately supporting the use of onsite wastewater treatment systems where sewers are not available for the disposal of wastewater? ☐ ☐ ☐ ☒

This question would apply to the Proposed Project only if it were located in an area not served by an existing sewer system. The Project Site is located in an urban setting, and the Sanitation Districts of Los Angeles County sewers serve the Project Site. No onsite wastewater treatment systems for the disposal of wastewater would be used as part of the Proposed Project. Therefore, no impact would occur.

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31 Ibid.
32 Ibid.

f) Conflict with the Hillside Management Area Ordinance (L.A. County Code, Title 22, Ch.22.104)? ☐ ☐ ☐ ☒

Hillside Management Areas (HMAs) are considered a type of scenic resource where mountainous or foothill terrain has a natural slope of 25 percent or greater.[33] The Project Site is flat and not located within a Hillside Management Area. Thus, the Project Site is not subject to hillside design standards. The Proposed Project would not conflict with the Hillside Management Area Ordinance or hillside design standards in the County General Plan Conservation and Open Space Element. Therefore, no impact would occur.

[33] County of Los Angeles Department of Regional Planning, 2015, Los Angeles County General Plan, Chapter 9: Conservation and Natural Resources Element, website: https://planning.lacounty.gov/generalplan/generalplan, accessed June 2021.

8. GREENHOUSE GAS EMISSIONS

Regulatory Setting

Gases that trap heat in the atmosphere are called greenhouse gases ("GHG"), since they have effects that are analogous to the way in which a greenhouse retains heat. Greenhouse gases are emitted by both natural processes and human activities. The accumulation of greenhouse gases in the atmosphere regulates the earth's temperature. The principal GHGs are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), sulfur hexafluoride (SF_6), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), and water vapor (H_2O). CO_2 is the reference gas for climate change because it is the predominant greenhouse gas emitted. To account for the varying warming potential of different GHGs, GHG emissions are often quantified and reported as CO_2 equivalents (CO_2e).

The State of California has undertaken initiatives designed to address the effects of greenhouse gas emissions, and to establish targets and emission reduction strategies for greenhouse gas emissions in California. California has enacted several pieces of legislation that relate to GHG emissions and climate change, much of which sets aggressive goals for GHG reductions within the state. Per Senate Bill 97, the California Natural Resources Agency adopted amendments to the CEQA Guidelines, which address the specific obligations of public agencies when analyzing GHG emissions under CEQA to determine a project's effects on the environment. However, neither a threshold of significance nor any specific mitigation measures are included or provided in these CEQA Guideline amendments. The following includes a brief discussion of various GHG-related policies that have been adopted at the state and local levels.

Assembly Bill 32

The California Global Warming Solutions Act of 2006, widely known as AB 32, requires the California Air Resources Board (CARB) to develop and enforce regulations for the reporting and verification of statewide GHG emissions. CARB is directed to set a statewide GHG emission limit, based on 1990 levels, to be achieved by 2020. The bill set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner.

The heart of the bill is the requirement that statewide GHG emissions be reduced to 1990 levels by 2020. As previously determined by CARB, California projected it needed to reduce GHG emissions to a level approximately 28.4% below CARB's 2020 "business-as-usual" GHG emission projections (as set forth in the 2008 Scoping Plan) to achieve this goal.[34] The bill requires CARB to adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective GHG reductions.

Climate Change Scoping Plan

In December 2008, CARB approved a Climate Change Scoping Plan. The Climate Change Scoping Plan calls for a "coordinated set of solutions" to address all major categories of GHG emissions. The Initial Scoping Plan in 2008 presented the first economy-wide approach to reducing emissions and highlighted the value of combining both carbon pricing with other complementary programs to meet California's 2020 GHG emissions cap while ensuring progress in all sectors. The coordinated set of policies in the Initial Scoping Plan employed strategies tailored to specific needs, including market-based compliance mechanisms, performance

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[34] CARB has not calculated the percent reduction required to achieve AB 32's mandate of returning to 1990 levels of GHG emissions by 2020. The value of 28.4% as the required reduction to achieve 1990 emissions in 2020 is an approximate value. Based on the Scoping Plan estimates and conservative rounding, the value could be 28.5%.

standards, technology requirements, and voluntary reductions. The Initial Scoping Plan also described a conceptual design for a cap-and-trade program that included eventual linkage to other cap-and-trade programs to form a larger regional trading program.

AB 32 requires CARB to update the scoping plan at least every five years. The First Update to the Scoping Plan (First Update), approved in May 2014, presented an update on the program and its progress toward meeting the 2020 limit. It also developed the first vision for the long-term progress that the State endeavors to achieve. In doing so, the First Update laid the groundwork to transition to the post-2020 goals set forth in Executive Orders S-3-05 and B-16-2012.[35] It also recommended the need for a 2030 mid-term target to establish a continuum of actions to maintain and continue reductions, rather than only focusing on targets for 2020 or 2050.

In December 2017, CARB adopted "California's 2017 Climate Change Scoping Plan" that establishes a proposed framework of action for California to meet a 40 percent reduction in greenhouse gases by 2030 compared to 1990 levels, and substantially advance toward the 2050 climate goal of 80 percent below 1990 levels. The 2017 Climate Change Scoping Plan is part of the public process to update the AB 32 Scoping Plan to reflect Governor's Executive Order B-30-15 and SB 32, which establish a mid-term GHG emission reduction target for California of 40 percent below 1990 levels by 2030. All State agencies with jurisdiction over sources of GHG emissions were directed to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 targets. CARB and other State agencies are identifying the suite of programs, regulations, incentives, and supporting actions needed to continue driving down emissions and ensure we are on a trajectory to meet our mid- and long-term climate goals.

The 2017 Scoping Plan includes input from a range of State agencies and is the result of a two-year development process including extensive public and stakeholder outreach designed to ensure that California's climate and air quality efforts continue to improve public health and drive development of a more sustainable economy. The 2017 Scoping Plan reflects the direction from the legislature on the Cap-and-Trade Program, as described in AB 398, the need to extend the key existing emissions reductions programs, and acknowledges the parallel actions required under AB 617 to strengthen monitoring and reduce air pollution at the community level.

Executive Order B-30-15

Governor of California, Jerry Brown, issued Executive Order B-30-15, effective immediately on April 29, 2015, ordering a new interim statewide greenhouse gas emission reduction target to reduce greenhouse gas emissions to 40 percent below 1990 levels by 2030 in order to ensure California meets its target of reducing greenhouse gas emissions to 80 percent below 1990 levels by 2050. All state agencies with jurisdiction over sources of greenhouse gas emissions shall implement measures, pursuant to statutory authority, to meet the 2030 and 2050 greenhouse gas emissions reductions targets. The CARB shall update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons of carbon dioxide equivalent. With this order, California sets a high bar to reduce GHG emissions. California will continue its rigorous climate change research program focused on understanding the impacts of climate change and how best to prepare and adapt to such impacts.

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[35] Executive Order S-30-15 established three statewide targets: 1) By 2010, reduce GHG emissions to 2000 levels; 2) By 2020, reduce GHG emissions to 1990 levels; 3) By 2050, reduce GHG emissions to 80 percent below 1990 levels. Executive Order B-16-2012 facilitated the commercialization of zero-emission vehicles and reestablished the 2050 target to reduce GHG emissions to 80 percent below 1990 levels.

Executive Order B-55-18

Executive Order B-55-18, issued by Governor Brown in September 2018, establishes a new statewide goal to achieve carbon neutrality as soon as possible, but no later than 2045, and achieve and maintain net negative emissions thereafter. Executive Order B-55-18 directs CARB to work with relevant state agencies to develop a framework for implementation and accounting that tracks progress toward this goal as well as ensuring future scoping plans identify and recommend measures to achieve the carbon neutrality goal.

Sustainable Communities and Climate Protection Act (SB375)

California's Sustainable Communities and Climate Protection Act, also referred to as Senate Bill (SB) 375, became effective January 1, 2009. The goal of SB 375 is to help achieve AB 32's GHG emissions reduction goals by aligning the planning processes for regional transportation, housing, and land use. SB 375 requires CARB to develop regional reduction targets for GHGs and prompts the creation of regional plans to reduce emissions from vehicle use throughout the State. California's 18 Metropolitan Planning Organizations (MPOs) have been tasked with creating Sustainable Community Strategies (SCS) in an effort to reduce the region's vehicle miles traveled (VMT) in order to help meet AB 32 targets through integrated transportation, land use, housing and environmental planning. Pursuant to SB 375, CARB set per-capita GHG emissions reduction targets from passenger vehicles for each of the State's 18 MPOs. On September 23, 2010, CARB issued a regional eight (8) percent per capita reduction target for the planning year 2020, and a conditional target of 13 percent for 2035. As part of its regional planning efforts, SCAG prepared and has adopted Connect SoCal (2020 RTP/SCS) to address regional growth and measure progress toward achieving regional planning goals and objectives.

Connect SoCal (2020 RTP/SCS)

On September 3, 2020, SCAG's Regional Council adopted the Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy). In 2012, SCAG adopted the region's first Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) – a plan that the Regional Council now calls Connect SoCal. On October 30, 2020, through Executive Order G-20-239, CARB accepted SCAG's 2020 RTP/SCS as a GHG reduction plan.[36]

Connect SoCal charts a path toward a more mobile, sustainable, and prosperous region by making connections between transportation networks, between planning strategies, and between the people whose collaboration can improve the quality of life for Southern Californians. Connect SoCal builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. Within the Connect SoCal Plan, the 2020 SCS would, when implemented, meet the applicable 2035 GHG emissions reduction target for automobiles and light trucks as established by CARB in 2018, specifically, a 19 percent per capita reduction by 2035 relative to 2005 levels. CARB staff's determination summarizes its assessment, findings, and recommendations relating to the determination on the 2035 target. The Connect SoCal plan lays out a strategy for the region to meet these targets. The Connect SoCal SCS has been found to meet state targets for reducing GHG emissions from cars and light trucks. Connect SoCal achieves per capita GHG emission reductions relative to 2005 levels of 8 percent in 2020, and 19 percent in 2035, thereby meeting the GHG reduction targets established by the ARB for the SCAG region.

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[36] State of California, Air Resources Board, Executive Order G-20,239, website: https://scag.ca.gov/sites/main/files/file-attachments/carb-2020-scs-evaluation-packet.pdf?1606337689, accessed June 2021.

As part of the State's mandate to reduce per-capita GHG emissions from automobiles and light trucks, Connect SoCal presents strategies and tools that are consistent with local jurisdictions' land use policies and incorporate best practices for achieving the state-mandated reductions in GHG emissions at the regional level through reduced per-capita vehicle miles traveled (VMT). These strategies identify how the SCAG region can implement Connect SoCal and achieve related GHG reductions. The following strategies are intended to be supportive of implementing the regional SCS: 1) focus growth near destinations and mobility options; 2) promote diverse housing options; 3) leverage technology innovations; 4) support implementation of sustainability policies; and 5) promote a green region.

Unincorporated Los Angeles County Community Climate Action Plan 2020

The County of Los Angeles released its Final Unincorporated Los Angeles County Community Climate Action Plan 2020 (CCAP) in August 2015, which serves to mitigate and avoid GHG emissions associated with community activities in the unincorporated areas of Los Angeles County. The CCAP demonstrates the County's leadership and role in contributing to statewide GHG emission reductions. The CCAP addresses emissions from community activities in the following sectors: building energy, transportation, water conveyance and wastewater processing, and waste generation. The CCAP also establishes a GHG reduction target consistent with the State's efforts to reduce GHG emissions and provides a roadmap for successfully implementing GHG reduction measures selected by the County.

Public agencies and private developers can also use the CCAP to comply with project-level review requirements pursuant to the California Environmental Quality Act (CEQA). The CCAP meets CEQA Guidelines Section 15183.5 listed above by: 1) quantifying all primary sectors of GHG emissions within the unincorporated areas for 2010 and 2020; 2) including a reduction target of at least 11% below 2010 levels, which is consistent with the recommendations in the AB 32 Scoping Plan for municipalities to support the overall AB 32 reduction targets; 3) analyzing community emissions for the unincorporated areas as a whole and including predicted growth expected by 2020; 4) including specific measures to achieve the overall reduction target; 5) including periodic monitoring of plan progress; and 6) submitting the CCAP to be adopted in a public process following compliance with CEQA.

State CEQA guidelines specify that CEQA project evaluation of GHG emissions can "tier off" a programmatic analysis of GHG emissions, provided that the programmatic analysis (or climate action plan) meets requirements specified in State CEQA Guidelines Section 15183.5. The CCAP meets those requirements. The CCAP states: "Tiering from the General Plan EIR potentially eliminates the need to prepare a quantitative assessment of project level GHG emissions. Rather, project-specific environmental documents that rely on the CCAP can qualitatively evaluate GHG impacts by identifying all applicable CCAP actions and describing how those actions have been incorporated into the project design and/or identified as mitigation. This type of "tiered" analysis can reduce project costs and streamline the County permit process." And "projects that demonstrate consistency with applicable CCAP actions can be determined to have a less than significant cumulative impact on GHG emissions and climate change (notwithstanding substantial evidence that warrants a more detailed review of project-level GHG emissions)."

GHG Significance Threshold

Section 15064.4 of the CEQA Guidelines serves to assist lead agencies in determining the significance of the impacts of GHGs. However, neither the SCAQMD nor the State CEQA Guidelines Amendments provide any adopted thresholds of significance for addressing a project's GHG emissions. Further, because the County does not currently have an adopted quantitative threshold of significance for a project's generation of greenhouse gas emissions, the following analysis is based on a combination of the requirements outlined in the CEQA Guidelines.

As required in Section 15604.4 of the CEQA Guidelines, this analysis includes an impact determination based on the following: (1) an estimate of the amount of greenhouse gas emissions resulting from the Proposed Project; (2) a qualitative analysis or performance based standards; (3) a quantification of the extent to which the Proposed Project increases greenhouse gas emissions as compared to the existing environmental setting; and (4) the extent to which the Proposed Project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Further, the SCAQMD CEQA Greenhouse Gas Significance Threshold working group recommended a threshold of 3,000 $MTCO_2e$ per year for non-industrial land use projects for use where SCAQMD is the lead agency. In the absence of an adopted numeric threshold that applies to projects in the County of Los Angeles, the significance of the Proposed Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b) by considering whether the Proposed Project complies with applicable plans, policies, regulations and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. For the Proposed Project, as a land use development project, the most directly applicable adopted regulatory plan to reduce GHG emissions is the County's CCAP, which sets a target to reduce GHG emissions from community activities in the unincorporated areas of Los Angeles County by at least 11 percent below 2010 levels by 2020. The CCAP describes the County's plan for achieving this goal, including specific actions for each of the major emissions sectors, and provides details on the 2010 and projected 2020 emissions in the unincorporated areas. This analysis also considers consistency with regulations or requirements adopted by the Climate Change Scoping Plan and subsequent updates, and the Connect SoCal Plan (2020 RTP/SCS), which is designed to achieve GHG reductions from the land use and transportation sectors as required by SB 375 and the State's long-term climate goals.

Therefore, the Proposed Project's GHG emissions impact determination relies mainly on an evaluation of consistency with CCAP, which is a component of the County's General Plan (2015). While a qualitative analysis of the Proposed Project's consistency with CCAP is sufficient for a significance determination, a quantitative disclosure of the Proposed Project's estimated GHG emissions is provided for informational purposes.

Baseline GHG Emissions

The Project Site is currently developed with a child development center and its associated surface parking lot, which serves as the existing baseline. The average daily GHG emissions generated by the existing Project Site have been estimated utilizing the computer model, CalEEMod.2016.3.2, as recommended by the SCAQMD. GHG emissions are currently generated by building operating systems, operational activities related to the child development center, and vehicles traveling to and from the Project Site. The existing operations on the Project Site generate approximately 171.75 CO_2e metric tons per year (see Appendix B to this IS/MND).

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project:				
a) Generate greenhouse gas (GHGs) emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐

A significant impact would occur if the Proposed Project would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. The Proposed Project has the potential to generate GHG emissions as a result of the temporary construction activities and long-term operation of the Proposed Project. As mentioned above, the Proposed Project's GHG emissions impact

determination relies mainly on an evaluation of consistency with CCAP. While a qualitative analysis of the Proposed Project's consistency with CCAP is sufficient for a significance determination, a quantitative disclosure of the Proposed Project's estimated GHG emissions is provided for informational purposes. To assess the Proposed Project's contribution of GHG emissions, the construction and operational emissions were quantified using CalEEMod.2016.3.2, as discussed in further detail below.

Consistency with the CCAP

The Proposed Project includes several design features that would support GHG emissions reduction strategies as set forth in the CCAP. Specific design features in support of County initiatives are listed below.

- Green Building and Energy: The Proposed Project would meet the minimum California Title 24 and Los Angeles County Green Building Standards Code energy efficiency requirements and further reduce demand for electricity, natural gas, and transportation energy. Specifically, the Proposed Project would include energy efficient lighting fixtures, low-flow water features, energy efficient mechanical heating and ventilation systems, and cool roofs. Additionally, although the Los Angeles County Green Building Standards Code does not require the incorporation of electric vehicle charging stations (EVCS) for affordable housing projects, the Proposed Project would provide 3 parking spaces capable of supporting future EVSE. The provision of EV-capable infrastructure would further serve to promote the utilization of alternative fueled vehicles thus reducing the combustion of fossil fuels.
- Land Use and Transportation: The Proposed Project would aid the County in meeting the changing demand for housing types by providing units within walking distance of employment and patronage opportunities and transit options. The proposed residential dwelling units would be adequately served by bus and rail transit lines operated by Metro and LACDPW Transit (The Link-Willowbrook). The Proposed Project would provide residents and visitors with convenient access to public transit and opportunities for walking and biking, which would facilitate a reduction in VMT and related vehicular GHG emissions.
- Water Conservation and Wastewater: The Proposed Project would install drought-tolerant landscaping and install low-flow fixtures.
- Water Reduction, Reuse, and Recycling: The Proposed Project would comply with conservation waste recycling requirements, diverting construction waste from area landfills.
- Land Conservation and Tree Planting: The Proposed Project would not remove any protected trees or vegetation and would plant a minimum of four new trees on the Project Site. Additionally, the Proposed Project includes 17,000 square feet of common open space area on the ground floor and would also feature 25,004 square feet of proposed landscaped area.

As shown above, the Proposed Project would be consistent with the strategy areas in the CCAP that would reduce GHGs.

Construction

Construction of the Proposed Project would emit GHG emissions through the combustion of fossil fuels by heavy-duty construction equipment, through vehicle trips generated by construction workers traveling to and from the Project Site, and from the disposal of construction waste. Construction emissions represent an episodic, temporary source of GHG emissions. To be consistent with the guidance from the SCAQMD for calculating criteria pollutants from construction activities, only GHG emissions from on-site construction activities and off-site hauling and construction worker commuting are considered as Project-generated emissions. Emissions of GHGs were calculated for each year of construction of the Proposed Project. The Proposed Project's annual construction-generated GHG emissions are expressed in CO_2e metric tons per year (CO_2e MTY) and are presented in Table 6, Proposed Project Construction-Related Greenhouse Gas

Emissions, below. As shown in Table 6, the Proposed Project's total construction-related greenhouse gas emissions are estimated to be approximately 652 CO_2e metric tons, with the greatest annual increase in GHG emissions occurring in 2023.

Operational

The GHG emissions resulting from operation of the Proposed Project, which involves the usage of on-road mobile vehicles, electricity, natural gas, water, landscape equipment, and generation of solid waste and wastewater, were calculated under the assumption of compliance with Title 24 building regulations. Emissions of the Proposed Project's operational GHGs are shown in Table 7, Proposed Project Operational Greenhouse Gas Emissions, below. As shown in Table 7, operation of the Proposed Project is expected to generate approximately 454 CO2e MTY.

Given the lack of a formally adopted numerical significance threshold applicable to the Proposed Project, SCAQMD's proposed screening level of 3,000 MTCO2e is used to provide a quantitative disclosure of the Proposed Project's estimated GHG emissions for informational purposes. To illustrate the scope of the Proposed Project's potential to generate GHG emissions, the following screening analysis has been provided. The SCAQMD released a draft guidance document regarding interim CEQA GHG significance thresholds in October 2008. At that time SCAQMD staff proposed a screening level of 3,000 metric tons of CO_2e per year for mixed-use or all land use projects, under which project impacts would be considered "less than significant." The 3,000-metric ton screening level was intended "to achieve the same policy objective of capturing 90 percent of the GHG emissions from new mixed-use or all land use development projects in the residential/commercial sectors." Citing the need for additional analysis to further define the performance standards and to coordinate with CARB staff's interim GHG proposal, no thresholds of significance were ever adopted for residential/commercial sectors. Nevertheless, for comparative purposes, it is worth noting that the Proposed Project's total GHG emissions would be less than the 3,000 metric tons of CO_2e per year screening threshold proposed by the SCAQMD staff in 2008.

As shown above, the Proposed Project would be consistent with the CCAP and would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs per SCAQMD's recommended thresholds. Therefore, the Proposed Project's GHG emissions and associated contribution to climate change is considered less than significant.

Table 6
Proposed Project Construction-Related Greenhouse Gas Emissions

Year	CO_2e Emissions (Metric Tons per Year) [a]
2023	340.06
2024	311.32
Total Project Construction GHG Emissions	**651.38**

[a] Construction CO_2 values were derived using CalEEMod.2016.3.2.
CalEEMod annual worksheets are provided in Appendix B to this IS/MND.

Table 7
Proposed Project Operational Greenhouse Gas Emissions

Emissions Source	CO_2e Emissions (Metric Tons per Year)
Area	0.88
Energy	114.92
Mobile	454.31
Stationary	4.59
Solid Waste	3.54
Water	25.80
Amortized Construction Emissions [a]	21.71
Total Project GHG Emissions:	**625.75**
Less Existing Emissions:	*(171.75)*
Net Total Project Site Emissions:	**454.00**

[a] The total construction GHG emissions were amortized over 30 years and added to the operation of the Project.
CalEEMod annual worksheets are provided in Appendix B to this IS/MND.

b) Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases? ☐ ☐ ☒ ☐

The Unincorporated Los Angeles County CCAP 2020 complies with CEQA by quantifying all primary sectors of GHG emissions within the unincorporated areas for years 2010 and 2020; including a reduction target of at least 11 percent below 2010 levels, which is consistent with the recommendations in the AB 32 Scoping Plan for municipalities to support the overall AB 32 reduction targets; analyzing community emissions for the unincorporated areas as a whole and including predicted growth expected by 2020; including specific measures to achieve the overall reduction target; including periodic monitoring of plan progress; and submitting the CCAP to be adopted in a public process following compliance with CEQA. There are 26 local actions included in the CCAP. The local actions are grouped into five strategy areas: green building and energy; land use and transportation; water conservation and wastewater; waste reduction, reuse, and recycling; and land conservation and tree planting. As discussed above in question (a), the Proposed Project would be consistent with the CCAP for the purpose of reducing GHG emissions.

Further, most emission reductions will be achieved by statewide initiatives to improve vehicle engine efficiency and reduce the carbon intensity of transportation fuels. The State's Renewable Portfolio Standard will increase the amount of electricity generated by renewable resources, reducing GHG emissions from electricity consumption. Other statewide and regional actions include CARB's SB 32 Scoping Plan and SCAG's Connect SoCal plan. CARB has outlined several potential strategies for achieving the 2030 reduction target of 40 percent below 1990 levels, as mandated by SB 32. These potential strategies include renewable resources for half of the State's electricity by 2030, increasing the fuel economy of vehicles and the number of zero-emission or hybrid vehicles, reducing the rate of growth in VMT, supporting high-speed rail and other alternative transportation options, and use of high-efficiency appliances, water heaters, and HVAC systems. The Proposed Project would benefit from statewide and utility-provider efforts towards increasing the portion of electricity provided from renewable resources. The Proposed Project would also include energy-efficient mechanical systems, ENERGY-STAR appliances to be installed on-site, and the use of high-efficiency lighting pursuant to the Los Angeles County Green Buildings Standards Code. The Proposed Project would also

benefit from statewide efforts towards increasing the fuel economy standards of vehicles. The Proposed Project would support reducing VMT growth given its location, design, and as an infill site that is accessible to existing Metro and Link-Willowbrook Transit local bus lines. Thus, the Proposed Project would be consistent with applicable GHG-reduction strategies in CARB's Scoping Plan. Furthermore, the Proposed Project would be consistent with the following key GHG reduction strategies in SCAG's Connect SoCal (2020 RTP/SCS), which are based on changing the region's land use and travel patterns by focusing growth near destinations and mobility options; promoting diverse housing choices; supporting implementation of sustainability policies; and promoting a green region. The Proposed Project would place affordable housing in a location that is served by bus and rail transit lines operated by Metro and the Los Angeles County Public Works Transit. As such, the Proposed Project would also be consistent with Connect SoCal goals that aim to maximize mobility and accessibility for all people and goods in the region, ensure travel safety and reliability, preserve and ensure a sustainable regional transportation system, protect the environment, encourage energy efficiency, and facilitate the use of alternative modes of transportation. Thus, the Proposed Project would not conflict with these applicable statewide and regional initiatives.

Additionally, the Proposed Project would comply with Title 24 standards for Building Energy Efficiency and the Los Angeles County Green Buildings Standards Code, and appliances purchased for the Proposed Project would be consistent with energy efficient standards. These energy efficient regulatory requirements and design features would ensure the Proposed Project would not result in unnecessary GHG emissions. As such, the Proposed Project would not conflict with the CCAP, with respect to GHG reduction strategies. Therefore, the Proposed Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, and impacts would be less than significant.

9. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials?	☐	☐	☒	☐

The Proposed Project involves the construction and operation of an affordable housing project and would not result in the routine transport, use, or disposal of hazardous materials. No hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes would routinely be transported to the Project Site. Use of these materials on the Project Site would comply with State Health Codes and Regulations. Therefore, the Proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials and impacts would be less than significant.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment?	☐	☐	☒	☐

A Phase One Environmental Site Assessment (Phase I ESA) was conducted by USA Environmental, Inc. The findings of the Phase I ESA are detailed in the *Phase One Environmental Site Assessment Report*, dated October 2020 (included in Appendix C to this IS/MND).

The Project Site includes one developed parcel and two partially vacant parcels. The developed parcel (APN 6152-002-021) is currently occupied by a child development center consisting of three one-story buildings and associated surface parking. The Proposed Project would include the demolition of the existing buildings. According to the Phase I ESA, the buildings were constructed in 1963. The buildings were initially used as a church through 1907 and have been used as a school from the 1990's through the 2020's. The vacant lot located on APN 6152-002-900 was formerly developed with a residential building between 1931 and 1971. The vacant lot located on APN 6152-002-901 was formerly developed with a supermarket between 1965 and 1981.

A recognized environmental condition (REC) refers to the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: due to release to the environment; under conditions indicative of a release to the environment; or under conditions that pose a material threat of a future release to the environment. The Phase I ESA did not identify any RECs, historic recognized environmental conditions (HRECs), controlled recognized environmental conditions (CRECs), or de minimis conditions associated with the Project Site.

As disclosed in the Phase I ESA the presence of asbestos containing material (ACM) on site was not tested. However, disturbance of any ACM would be handled in accordance with applicable local and State regulations (which include SCAQMD Rule 1403 and Cal/ Occupational Safety and Health Administration ("OSHA") Asbestos Construction Standard Title 8 CCR 1529). Similarly, disturbance of any lead-based paint (LBP)

materials would be handled in accordance with California Department of Public Health (CDPH) regulations in residential or public buildings and the US Department of Housing and Urban Development (HUD) and 2010 Toxic Substances Control Act (TSCA) Renovation, Repair and Painting Rule (RRP) in pre-1978 target housing and child- occupied facilities. DOSH or Cal/OSHA requirements must also be followed where employees may be occupationally exposed to lead. Adherence to regulatory compliance measures would ensure that impacts relating to the demolition of buildings with presumed ACM and LBP would be less than significant.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of sensitive land uses?	☐	☐	☒	☐

Sensitive land uses within one-quarter mile of the Project Site include schools and residential developments. The nearest schools to the Project Site are the Tri-Community County Community School, located at the northwest corner of El Segundo Boulevard and Willowbrook Avenue, approximately 0.1 mile south of the Project Site, and Anderson Elementary School, located 0.4 miles north of the Project Site. The closest residential land uses are the Mosaic Garden Apartments to the south and the single-family residences to the west and north of the Project Site.

Construction

Construction of the Proposed Project would involve the use of common construction materials, which could be potentially hazardous materials, including vehicle fuels, oils, and transmission fluids, if not handled properly. Such materials would be used only in quantities typically associated with the construction of a residential development and would be transported, handled, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions. Thus, there would not be a significant hazard to the public through the use of these materials.

Construction activities would also include demolition of existing structures on the Project Site that may contain ACM and LBP hazardous materials. As discussed above, disturbance of any ACM would be handled in accordance with applicable local and State regulations (which include SCAQMD Rule 1403 and Cal/ OSHA Asbestos Construction Standard Title 8 CCR 1529. Similarly, disturbance of any LBP materials would be handled in accordance with CDPH regulations in residential or public buildings and the HUD and 2010 RRP in pre-1978 target housing and child- occupied facilities. DOSH or Cal/OSHA requirements must also be followed where employees may be occupationally exposed to lead. Adherence to all applicable rules and regulations pertaining to the use, storage, and transport of potentially hazardous materials would reduce potentially significant impacts during construction to a less than significant level.

Operation

No hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes would routinely be transported to the Project Site. The Proposed Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of sensitive land uses. Therefore, operational impacts would be less than significant.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment? ☐ ☐ ☐ ☒

California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks (USTs), contaminated drinking water wells, and solid waste facilities from which there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. A significant impact may occur if the Project Site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses. As disclosed in the Phase I ESA, a review of regulatory databases, which includes standard federal, state, county, and city environmental record sources, did not identify any RECs, HRECs, CRECs, or de minimis conditions associated with the Project Site. The Project Site is not located on a list of hazardous materials sites and would not create a significant hazard to the public or the environment. Therefore, no impact would occur.

e) For a project located within an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? ☐ ☐ ☐ ☒

The nearest public use general aviation airport is the Compton/Woodley Airport, which is located 2.6 miles south of the Project Site at 901 W. Alondra Boulevard in the City of Compton. The Proposed Project, in both the existing General Plan and the Draft General Plan, is not located within a public airport land use plan area or subject to a safety hazard. Therefore, no impact would occur.

f) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan? ☐ ☐ ☐ ☒

The Proposed Project would not involve the long-term closure of any public roadway. Temporary road closures may occur during construction and utility connections. Access to the Project Site would be provided via a full-access driveway on 126th Street. As discussed in Section 15. Public Services (a) Fire, design requirements would be specified during site plan review for certain components of the Proposed Project (driveway widths and turning radii) to facilitate the LACFD's access to the Project Site in the event of a fire or other emergencies. As such, the Proposed Project would be required to be designed in such a way as to provide adequate emergency access. Thus, the Proposed Project would not impede an emergency response or evacuation plan and no impact would occur.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires, because the project is located:

i) within a high fire hazard area with inadequate access? ☐ ☐ ☐ ☒

The Project Site is located in an urbanized area within the community of Willowbrook and is not located within or near a State Responsibility Area or land classified as a Very High Fire Hazard Severity Zone

(VHFHSZ).[37] As discussed in Section 17. Transportation (d), the Proposed Project would not involve the long-term closure of any public roadway. Temporary road closures may occur during construction and utility connections. Access to the Project Site would be provided via a full-access driveway on 126th Street. As discussed in Section 15. Public Services (a) Fire, design requirements would be specified during site plan review for certain components of the Proposed Project (driveway widths and turning radii) to facilitate the LACFD's access to the Project Site in the event of a fire or other emergencies. As such, the Proposed Project would be required to be designed in such a way as to provide adequate emergency access. Thus, the Proposed Project would not impede emergency access on-site or off-site. The Proposed Project would not result in inadequate emergency access to the Project Site or to nearby properties. Therefore, no impact would occur.

ii) within an area with inadequate water and pressure to meet fire flow standards? ☐ ☐ ☐ ☒

The Project Site is located in an urban setting with established water infrastructure. Coordination would be completed through site plan review with the Los Angeles County Fire Department (LACFD) to ensure that the Proposed Project could be adequately served and meet fire flow requirements. Pursuant to the California Fire Code, Section 501.4, all required public fire hydrants shall be installed, tested, and accepted prior to beginning construction. Because the Project Site is located in an area with existing water and pressure, any necessary upgrades would be negligible. Therefore, with adherence to regulatory code, no impact would occur.

iii) within proximity to land uses that have the potential for dangerous fire hazard? ☐ ☐ ☐ ☒

The Project Site is located in an urban setting. Land uses surrounding the Project Site include multi- and single-family residential uses. Although fires can occur within any land use, the surrounding area does not pose any land uses that would create an adverse fire hazard. As disclosed in the Phase I ESA, a review of regulatory databases, which includes standard federal, state, county, and city environmental record sources, did not identify any RECs, HRECs, CRECs, or de minimis conditions associated with the Project Site. Additionally, the LACFD adequately serves the surrounding land uses. Therefore, no impact would occur.

h) Does the proposed use constitute a potentially dangerous fire hazard? ☐ ☐ ☐ ☒

The Proposed Project involves the construction and operation of an affordable multi-family development project. No hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes would routinely be transported to the Project Site. Use of these materials on the Project Site would comply with State Health Codes and Regulations. The Proposed Project would not propose any use that would constitute a potentially dangerous fire hazard. Therefore, no impact would occur.

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[37] Cal Fire, Los Angeles County FHSZ Map, website: https://osfm.fire.ca.gov/media/6705/fhszs_map19.pdf, accessed June 2021.

10. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐

A project would normally have a significant impact on surface water quality if discharges associated with the project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable National Pollution Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this specific issue, a significant impact may occur if the Proposed Project would discharge water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if the project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB). The Proposed Project would be required to demonstrate compliance with the County Stormwater Ordinance and the Los Angeles County Low Impact Development (LID) Ordinance, which would reduce potential water quality impacts. Additionally, significant impacts would occur if a project does not comply with the County Stormwater Ordinance which addresses provisions that apply to the discharge, deposit, or disposal of any stormwater and/or runoff to the storm drain system and/or receiving waters within any incorporated area covered by the NPDES stormwater permit.

Construction

Three general sources of potential short-term, construction-related stormwater pollution associated with the Proposed Project include: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion via storm runoff or mechanical equipment. As required under the NPDES, the Applicant is responsible for preparing a Storm Water Pollution Prevention Plan (SWPPP) to mitigate the effects of erosion and the inherent potential for sedimentation and other pollutants entering the stormwater system. The primary objectives of the NPDES storm water program requirements are to: 1) effectively prohibit non-storm water discharges; and 2) reduce the discharge of pollutants from storm water conveyance systems to the Maximum Extent Practicable ("MEP" statutory standard). The SWPPP would incorporate the required implementation of Best Management Practices (BMPs) for erosion control and other measures to meet the NPDES requirements for storm water quality. Implementation of the BMPs identified in the SWPPP and compliance with the NPDES and the County Stormwater Ordinance would ensure that the construction of the Proposed Project would not violate any water quality standards or discharge requirements, or otherwise substantially degrade water quality. Additionally, the implementation of regulatory requirements discussed below would ensure construction-related impacts to any water quality standards would be less than significant.

Operation

The Project Site includes one developed parcel and two partially vacant parcels. Under the Proposed Project, the Project Site would be fully developed with impervious surfaces, with the exception of 25,004 square feet of landscaped area. As such, surface water runoff from the Project Site would largely be directed to adjacent storm drains, with minimal amounts percolating into the soil of landscaped areas. Potential impacts to surface water runoff would be less than significant with incorporation of required stormwater pollution control measures. The Proposed Project would be required to demonstrate compliance with the County Stormwater Ordinance and the LID Ordinance. In addition, all operational activities would comply with applicable provisions in the County General Plan. Full compliance with the LID Ordinance, implementation of design related BMPs, and compliance with the County Stormwater Ordinance and General Plan would ensure that the operation of the Proposed Project would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. The Proposed Project would be required to adhere to the following code compliance:

- Prior to the issuance of grading or building permits for the Proposed Project, a Notice of Intent to comply with the Construction General Permit to the State of California Regional Water Quality Control Board shall be prepared and submitted. A copy of the Notice of Intent acknowledgement from the State of California Regional Water Quality Board must be submitted to the County.
- Prior to the commencement of Project construction, a Stormwater Pollution Prevention Plan per requirements of the National Pollutant Discharge Elimination System Construction General Permit shall be prepared and submitted to the County for review and approval. A copy of the Storm Water Pollution Prevention Plan shall be available at the construction site and shall be implemented at all times on the construction site. The Storm Water Pollution Prevention Plan shall outline the source control and/or treatment control Best Management Practices to avoid or mitigate runoff pollutants at the construction site to the maximum extent practicable.
- The Applicant shall comply with post-construction Best Management Practices requirements as detailed in the Los Angeles County Standard Urban Stormwater Mitigation Plan.
- Prior to the issuance of any discretionary entitlements, the Applicant shall submit a LID plan to the Director of LACDPW for review and approval that provides a comprehensive technical discussion of how the development project will comply with the LID Ordinance and the applicable provisions specified in the LID Standards Manual.

Therefore, implementation of regulatory requirements would ensure operation-related impacts to any water quality standards would be less than significant.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐

The Project Site is currently composed of impervious paving associated with the existing buildings and surface parking on the Project Site, and vacant land. As such, surface water runoff is largely directed to storm drains while some water runoff permeates the ground within the undeveloped portions of the Project Site. As noted in the Phase I ESA (See Appendix C), the ground water depth is approximately 40 feet below the ground surface and the flow direction is to the southeast. The soil at the Project Site consists of Silty Sandy Clay to approximately 25 feet below existing grade. Because the depth of groundwater is sufficiently lower than the depth of construction activities for the Proposed Project (which would require excavation of up to 2 feet below surface for site clearing, grading, and building foundation preparation), construction of the Proposed Project would not substantially deplete groundwater supplies or interfere substantially with groundwater

recharge. Additionally, As discussed in Section 19. Utilities and Services Systems (b) Water, the Project Site would be served by municipal water and would not rely on a groundwater well to serve the proposed uses. The Proposed Project would not substantially interfere with groundwater recharge. As a result, at a regional or greater aquifer level, the Proposed Project would not result in a significant impact. Therefore, impacts would be less than significant.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of a Federal 100-year flood hazard area or County Capital Flood floodplain; the alteration of the course of a stream or river; or through the addition of impervious surfaces, in a manner which would:	☐	☐	☒	☐
(i) Result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐

The concept of a 100-year or 500-year flood condition is used as a benchmark by civil engineers as a means to design flood control infrastructure. According to Federal Emergency Management Agency (FEMA), the Project Site is located in Zone X, which is an area of minimal flood hazard and determined to be outside the 0.2% annual chance floodplain.[38] Thus, the Proposed Project is not located within a designated 100- or 500-year flood hazard area, as defined by FEMA's Flood Insurance Mapping Program. Furthermore, although development of the Proposed Project has the potential to result in the erosion of soils during site preparation and construction activities, erosion would be reduced by implementation of erosion controls and BMPs to meet the NPDES requirements for storm water quality and be consistent with guidelines provided in the *California Storm Water Best Management Practice Handbooks: Construction*.[39] Specifically, a SWPPP would be required to mitigate the effects of erosion and the inherent potential for sedimentation and other pollutants entering the stormwater system. Implementation of the BMPs identified in the SWPPP and compliance with the NPDES discharge requirements would be anticipated to mitigate degradation of water quality during construction. Furthermore, the construction contractor shall incorporate best management practices consistent with the guidelines provided in the *California Storm Water Best Management Practice Handbooks: Construction,* as well as project design elements consistent with Office of Statewide Health Planning and Development, California Building Code, Uniform Building Code, or other required standards to further reduce any potential impacts. With compliance of the Los Angeles County Building Code and any conditions that may be required by the County to ensure compliance throughout the construction and development of the Proposed Project, impacts related to erosion or siltation would be reduced to a less than significant level.

(ii) Substantially increase the rate, amount, or depth of surface runoff in a manner which would result in flooding on- or offsite?	☐	☐	☒	☐

As discussed above, the Project Site is located outside an area designated as a 100-year flood hazard area. Furthermore, the Proposed Project would be required to implement Stormwater BMPs and comply with NPDES and the LID Ordinance. As a result, the Proposed Project would not be expected to substantially alter the existing drainage pattern, which would result in a substantial increase to the rate or amount of surface

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38 Federal Emergency Management Agency, FEMA Flood Map Center, website: https://msc.fema.gov/portal/home, accessed June 2021.

39 California Stormwater Quality Association, California Stormwater Best Management Practice Handbooks: Construction, website: https://www.casqa.org/resources/bmp-handbooks, accessed June 2021.

runoff in a manner which would result in flooding on or offsite. Therefore, impacts would be less than significant.

(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐

As discussed above, the Project Site is located outside an area designated as a 100-year flood hazard area. The Project Site is currently developed on one parcel with a child development center and surface parking and partially vacant on two others parcels. Where surfaces are impervious on the Project Site, surface water currently travels in a southeast direction to the storm drain system. Pursuant to local policy, storm water retention would be required as part of the LID implementation features. Any contaminants gathered during routine cleaning of construction equipment would be disposed of in compliance with applicable stormwater pollution prevention permits. Further, any pollutants from parking areas would be subject to the requirements and regulations of the NPDES and LID Ordinance. Accordingly, the Proposed Project would be required to demonstrate compliance with the LID Ordinance standards, which would reduce the Proposed Project's impact to the stormwater infrastructure. Therefore, the Proposed Project would not create or contribute substantial runoff water, which would exceed the capacity exiting or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. As such, impacts related to runoff would be less than significant.

(iv) Impede or redirect flood flows which would expose existing housing or other insurable structures in a Federal 100-year flood hazard area or County Capital Flood floodplain to a significant risk of loss or damage involving flooding?	☐	☐	☐	☒

According to Federal Emergency Management Agency (FEMA), the Project Site is located in Zone X, which is an area of minimal flood hazard and determined to be outside the 0.2% annual chance floodplain.[40] Thus, the Proposed Project is not located within a designated 100-year flood hazard area, as defined by FEMA's Flood Insurance Mapping Program. Therefore, the Proposed Project would not impede or direct flows, or place housing within a 100-year flood hazard area, and no impact would occur.

d) Otherwise place structures in Federal 100-year flood hazard or County Capital Flood floodplain areas which would require additional flood proofing and flood insurance requirements?	☐	☐	☐	☒

According to FEMA, the Project Site is located in Zone X, which is an area of minimal flood hazard and determined to be outside the 0.2% annual chance floodplain.[41] Thus, the Proposed Project is not located within a designated 100-year flood hazard area, as defined by FEMA's Flood Insurance Mapping Program. Therefore, the Proposed Project would not place structures within a 100-year flood hazard area, and no impact would occur.

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40 Federal Emergency Management Agency, FEMA Flood Map Center, website: https://msc.fema.gov/portal/home, accessed June 2021.
41 Ibid.

e) Conflict with the Los Angeles County Low Impact Development_Ordinance (L.A. County Code, Title 12, Ch. 12.84)? ☐ ☐ ☒ ☐

As discussed above, the Proposed Project would be designed to comply with the LID Ordinance. The Proposed Project would also be required to demonstrate compliance with the LID Ordinance. The LID plan shall provide a comprehensive technical discussion of how the development project will comply with the LID Ordinance and the applicable provisions specified in the LID Standards Manual. Full compliance with the LID Ordinance plan would ensure the Proposed Project does not conflict with the LID Ordinance. Impacts would be less than significant.

f) Use onsite wastewater treatment systems in areas with known geological limitations (e.g. high groundwater) or in close proximity to surface water (including, but not limited to, streams, lakes, and drainage course)? ☐ ☐ ☐ ☒

The Proposed Project does not include onsite wastewater treatment systems because the Proposed Project would utilize the municipal sewer systems. Additionally, as discussed in the Phase I ESA (See Appendix C) groundwater level beneath the Project Site is approximately 40 feet below the existing ground surface. Furthermore, the Proposed Project is not located in close proximity to any surface water, nor do any surface water bodies exist on the Project Site. Thus, the Proposed Project would not result in impacts related to use of onsite wastewater treatment systems in areas with known geological limitations or in close proximity to surface water bodies and no impact would occur.

g) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? ☐ ☐ ☐ ☒

The Proposed Project is located approximately 11 miles inland from the Pacific Ocean and thus, the Project Site would not be exposed to the effects of a tsunami. Based on a review of the County Seismic Safety Element, the Project Site is not located within the inundation boundaries of upgradient dams or reservoirs, that would present seiche hazards or result in inundation of the Project Site, which could lead to release of pollutants. In addition, there are no surface water bodies in the immediate area. As such, no impact would occur.

h) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? ☐ ☐ ☒ ☐

The Project Site is currently composed of impervious paving associated with the child development center and surface parking on one parcel of the Project Site, and vacant land on the other two parcels. As such surface water runoff is either directed to storm drains or permeates the ground within the undeveloped portions of the Project Site. As noted in the Phase I ESA (See Appendix C), the ground water depth is approximately 40 feet below the ground surface and the flow direction is to the southeast. Because the depth of groundwater is sufficiently lower than the depth of construction activities for the Proposed Project, construction of the Proposed Project would not interfere substantially with groundwater recharge. Additionally, the Project Site would be served by municipal water and would not rely on a groundwater well to serve the proposed uses. Furthermore, as discussed above, construction and post construction of the Proposed Project would comply with the NPDES by preparing a SWPPP to mitigate the effects of erosion and the inherent potential for sedimentation and other pollutants entering the stormwater system. The primary

objectives of the NPDES storm water program requirements are to: 1) effectively prohibit non-storm water discharges; and 2) reduce the discharge of pollutants from storm water conveyance systems to the MEP statutory standard. The SWPPP would incorporate the required implementation of BMPs for erosion control and other measures to meet the NPDES requirements for storm water quality. Therefore, the Proposed Project would not be expected to significantly affect surface water or groundwater quality and impacts would be less than significant.

11. LAND USE AND PLANNING

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒

The Project Site is located in the Willowbrook Community in unincorporated Los Angeles County. The Project Site is bordered by single- and multi-family residential buildings to the west, south and north, across E. 126th Street, and S. Willowbrook Avenue to the east. The Proposed Project includes the development of affordable multi-family housing in a residential community with single- and multi-family residential buildings. The Proposed Project's three-story building would be similar in height to the two- and three-story Mosaic Gardens Apartments to the south. Thus, the Proposed Project would not physically divide an established community. Therefore, no impact would occur.

b) Cause a significant environmental impact due to a conflict with any County land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

The Project Site is located in the Willowbrook Community in unincorporated Los Angeles County. The Project Site is guided at the regional level by Southern California Association of Government's (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and at the local level by the County's General Plan, Zoning Code, and the Willowbrook Community Standards District.

Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy

On September 3, 2020, the Southern California Association of Governments (SCAG) Regional Council adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), also known as Connect SoCal.[42] The 2020-2045 RTP/SCS presents a long-term transportation vision through the year 2045 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. The 2020-2045 RTP/SCS contains baseline socioeconomic projections that are used as the basis for SCAG's transportation planning, and the provision of services by other regional agencies. SCAG's overarching strategy for achieving its goals is integrating land use and transportation. SCAG policies are directed towards the development of regional land use patterns that contribute to reductions in vehicle miles traveled and improvements to the transportation system. Connect SoCal's "Core Vision" centers on maintaining and better managing the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets. The plans "Key Connections" augment the "Core Vision" to address challenges related to the intensification of core planning strategies and increasingly aggressive greenhouse gas reduction goals, and include but are not limited to, Housing Supportive Infrastructure, Go Zones, and Shared Mobility. Connect SoCal intends to create benefits

[42] Southern California Association of Governments, Connect SoCal: The 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy, September 3, 2020, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176. Accessed June 2021.

for the SCAG region by achieving regional goals for sustainability, transportation equity, improved public health and safety, and enhancement of the regions' overall quality of life. Overarching goals of Connect SoCal include:

- Improve mobility, accessibility, reliability, and travel safety for people and goods.
- Enhance the preservation, security, and resilience of the regional transportation system.
- Increase person and goods movement and travel choices within the transportation system.
- Reduce greenhouse gas emissions and improve air quality.
- Support healthy and equitable communities.
- Adapt to a changing climate and support an integrated regional development pattern and transportation network.
- Leverage new transportation technologies and data-driven solutions that result in more efficient travel.
- Encourage development of diverse housing types in areas that are supported by multiple transportation options.

The Proposed Project would be consistent with Connect SoCal goals by creating new high-density multi-family affordable housing within walking distance of transit stops and employment opportunities. The Proposed Project would develop 51 affordable housing units. 100% of the dwelling units would be set aside for lower income households. As discussed in Section 17. Transportation (b), the Proposed Project would reduce vehicle miles traveled (VMT)s by providing 28 long-term and six short-term bicycle parking spaces to promote non-auto travel and the Project Site is located within walking distance to Metro and The Link bus stops and Metro's Blue Rail Line. The Project Site is also located within walking distance to commercial and community amenities along El Segundo Boulevard, which would also promote non-auto travel. Furthermore, as discussed in Section 14. Population and Housing (a), the proposed increase in housing units and population as a result of the Proposed Project is substantially within SCAG's Connect So Cal growth forecast. The Proposed Project would not induce substantial population growth in the area. As such, the Proposed Project would be consistent with Connect SoCal goals that aim to maximize mobility and accessibility for all people and goods in the region, ensure travel safety and reliability, preserve and ensure a sustainable regional transportation system, protect the environment, encourage energy efficiency, and facilitate the use of alternative modes of transportation.

General Plan, Land Use Element

The County adopted the Los Angeles County General Plan 2035 (General Plan) on October 6, 2015. The General Plan sets forth goals, objectives, policies, and programs to guide future development in the County through the year 2035. The General Plan aims to accommodate new housing and jobs within the unincorporated areas in anticipation of population growth in the County and the region. The County's General Plan includes the following Framework Elements: Land Use, Mobility, Air Quality, Conservation and Natural Resources, Parks and Recreation, Noise, Safety, Public Services and Facilities, and Economic Development. The General Plan include numerous provisions that are intended to avoid or reduce potential adverse effects on the environment.

The County's General Plan land use designation for the entire site is H9 (Residential: 0-9 du/net ac)[43], which allows for the development of 0-9 dwelling units per net acre, which would allow a development up to approximately 11 dwelling units. The Proposed Project includes 51 dwelling units, which is not consistent

[43] County of Los Angeles Department of Regional Planning, 2015, Los Angeles County General Plan, Chapter 6: Land Use Element, http://planning.lacounty.gov/generalplan/generalplan, accessed June 2021.

with the allowable density under the existing H9 land use designation. Thus, the Applicant is proposing a General Plan Amendment from the existing General Plan land use designation of H9 to the General Plan land use category of H30 (Residential: 0-30 du/net ac) for the Proposed Project, which allows for 0-30 dwelling units per net acre. Under the H30 General Plan land use designation, the Project Site would accommodate up to 37 dwelling units. The Applicant is also requesting a 36% density bonus in exchange for setting aside 100% of the units as affordable to lower income households, to allow for the development of up to 51 dwelling units on the Project Site.

The Proposed Project would be consistent with all applicable General Plan land use standards of the H30 land use designation. As such, the General Plan Amendment for the Proposed Project would also be consistent with the General Plan land use designations for the adjacent land uses (H9, H30, P, and CG). Additionally, the General Plan Amendment for the Proposed Project would not alter the intended use of the Project Site for housing, only increase the allowed density on the Project Site to 51 units of affordable housing, which is compatible with neighboring multi-family apartment buildings in the Project area. The Proposed Project's requested entitlements would require site plan review and approval from the County. Approval of the Proposed Project's requested entitlements would ensure impacts are less than significant.

Zoning Code

All development activity on the Project Site is subject to the County's Municipal Code, particularly Title 22 (Planning and Zoning). The County's Municipal Code defines the range of zoning classifications throughout the County, provides the specific permitted uses applicable to each zoning designation, and applies development regulations to each zoning designation. Chapter 22.120 (Density Bonus) of the Municipal Code would also be applicable to the Proposed Project as it includes provisions related to development standards, incentives and waivers, and density bonus specific to affordable housing projects.

The Project Site is zoned R-1 (Single-Family Residence). The Proposed Project includes construction of a 51-unit affordable housing development with 23 surface parking spaces. As such, the proposed multi-family residential structure is not consistent with the uses allowed in the R-1 Zone. Thus, the Applicant is proposing a Zone Change from R-1 to R-3 (Limited Density Multiple Residence) to accommodate the Proposed Project. The Applicant is also requesting an Affordable Housing Density Bonus of 36% and an incentive to increase the maximum building height. The Proposed Project would consist of a three-story residential building with a height of 41 feet above grade. Per the Willowbrook Community Standards District (CSD), the maximum height permitted in the R-3 zone is 35 feet and two stories. In exchange for providing an affordable housing set-aside, the housing development is eligible to receive incentives to exceed the maximum height by six feet and an additional story. the With approval of the requested Zone Change, density bonus and incentives, the Proposed Project would be consistent with the development standards in the R-3 zone, including but not limited to building height and setbacks. The Applicant would also be required to submit a complete application for approval by the County prior to construction of the Proposed Project. Compliance with regulatory requirements would reduce zoning impacts to less than significant.

Willowbrook Community Standards District and Willowbrook Community Redevelopment Program

The Project Site is located in the Willowbrook Community Standards District (CSD) in the unincorporated area of the County. CSD regulations supplement the countywide zoning and subdivision regulations. As stated in Section 22.352 of the County's Municipal Code, the CSD was established to provide a means of assisting in the implementation of the adopted Willowbrook Community Redevelopment Program (RDP). The Proposed Project's RDP contains the community's goals and objectives related to land use and the physical development of Willowbrook. The requirements of the CSD ensure that the goals and policies of the RDP

are accomplished in a manner which protects the health, safety, and welfare of the community.[44] Goals of the Willowbrook RDP include:

A. Achieve an option balance, and harmonious land-use configuration in accordance with the revealed needs and preferences of the residents of the project area;
B. Eliminate and discourage the spread of blight conditions and encourage both the rehabilitation and redevelopment of the project area to the extent permitted by law;
C. Eradicate negative environmental influences and deficiencies;
D. Remove structurally substandard buildings in the project area so that land may be put to its highest and best use by new construction through the acquisition and redevelopment of land;
E. Develop a plan in accordance with all aspects of the general plan of the county of Los Angeles and the environmental development guide of the regional planning commission of the county of Los Angeles;
F. Provide a substantial number of housing units of low and moderate cost on land to be disposed of for residential purposes;
G. Provide participation for owners and tenants and a reasonable preference for persons engaged in business in the project area;
H. Encourage and foster the economic revitalization of the project area;
I. Relocate the owners and occupants of the project area as needed;
J. Develop public facilities in the project area to provide safer and more efficient service for the people in the area and the general public as a whole.

As discussed above, the Applicant is proposing a General Plan Amendment from the existing General Plan land use designation of H9 (Residential: 0-9 du/net ac) to the General Plan land use category of H30 (Residential: 0-30 du/net ac) for the Proposed Project. With the requested density bonus in combination with the General Plan Amendment, the Proposed Project would be consistent with the H30 land use designation. The General Plan Amendment for the Proposed Project would be consistent with multi-family adjacent land uses, specifically the three-story Mosaic Gardens Apartments complex to the immediate south of the Project Site.

The Proposed Project would be consistent with all applicable development standards of the CSD and would meet the goals of the RDP. The Proposed Project would include the construction of 51 affordable housing units on the Project Site, thereby adding new, high-density, multi-family housing on an underutilized site. The Proposed Project would complement the building style and land uses of the surrounding area and be consistent with requirements of the CSD relative to lot coverage, building height, open space, and other development standards in the R-3 Zone. The Applicant would be required to obtain a General Plan Amendment, a Zone Change, and other applicable land use approvals. The Applicant would also be required to submit a complete application for approval by the County prior to construction of the Proposed Project. Compliance with regulatory requirements would reduce land use and planning impacts to less than significant.

[44] County of Los Angeles, Title 22 (Planning and Zoning,), website: https://library.municode.com/index.aspx?clientId=16274, accessed June 2021.

c) Conflict with the goals and policies of the General Plan related to Hillside Management Areas or Significant Ecological Areas? ☐ ☐ ☐ ☒

Hillside Management Areas (HMAs) are considered a type of scenic resource where mountainous or foothill terrain has a natural slope of 25 percent or greater.[45] The Project Site is not located within a Hillside Management Area and would not conflict with Hillside Management criteria. The Project Site is generally flat. Additionally, the Project Site and the surrounding area are not located within a designated Significant Ecological Area (SEA) and would not be subject to or conflict with SEA conformance criteria.[46] Therefore, no impact would occur.

[45] County of Los Angeles, Title 22 (Planning and Zoning,), Section 22.104352, Willowbrook Community Standards District Hillside Management Areas, website: https://library.municode.com/ca/los_angeles_county/codes/, accessed June 2021.

[46] County of Los Angeles, Department of Regional Planning Commission, 2015, Los Angeles County General Plan, Chapter 9: Conservation and Natural Resources Element, Figure 9.3: Significant Ecological Areas and Coastal Resource Areas Policy Map, website: https://planning.lacounty.gov/generalplan/generalplan, accessed June 2021.

12. MINERAL RESOURCES

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒

The Proposed Project is located in an urbanized area of Los Angeles County, and there are no known mineral resources located on the Project Site or in the vicinity of the Project Site as mapped by the County.[47] The Proposed Project would not be located in a Mineral Resource Zone in the General Plan. The Proposed Project would not result in the loss of availability of a known mineral resource. Therefore, no impact would occur.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

The Proposed Project is not located within a Mineral Resource Zone as mapped by the County.[48] The resources and materials used in the construction of the Proposed Project would not include any materials considered rare or unique. The Proposed Project would not be located in a Mineral Resource Zone in the General Plan. The Proposed Project would not result in the loss of availability of a locally important mineral resource recovery site. Therefore, no impact would occur.

47 County of Los Angeles Department of Regional Planning, 2015, Los Angeles County General Plan, Figure 9.6: Mineral Resources Map, https://planning.lacounty.gov/generalplan/generalplan, accessed June 2021.

48 Ibid.

13. NOISE

Fundamentals of Noise

Sound is technically described in terms of amplitude (loudness) and frequency (pitch). The standard unit of sound amplitude measurement is the decibel (dB). The decibel scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound. The pitch of the sound is related to the frequency of the pressure vibration. Since the human ear is not equally sensitive to a given sound level at all frequencies, a special frequency-dependent rating scale has been devised to relate noise to human sensitivity. The A-weighted decibel scale (dBA) provides this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

Noise, on the other hand, is typically defined as unwanted sound. A typical noise environment consists of a base of steady "background" noise that is the sum of many distant and indistinguishable noise sources. Superimposed on this background noise is the sound from individual local sources. These can vary from an occasional aircraft or train passing by to virtually continuous noise from, for example, traffic on a major highway.

Several rating scales have been developed to analyze the adverse effect of community noise on people. Since environmental noise fluctuates over time, these scales consider that the effect of noise upon people is largely dependent upon the total acoustical energy content of the noise, as well as the time of day when the noise occurs. Those that are applicable to this analysis are as follows:

- L_{eq} – An L_{eq}, or equivalent energy noise level, is the average acoustic energy content of noise for a stated period of time. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.
- L_{max} – The maximum instantaneous noise level experienced during a given period of time.
- L_{min} – The minimum instantaneous noise level experienced during a given period of time.
- CNEL – The Community Noise Equivalent Level is a 24-hour average L_{eq} with a 5 dBA "weighting" during the hours of 7:00 P.M. to 10:00 P.M. and a 10 dBA "weighting" added to noise during the hours of 10:00 P.M. to 7:00 A.M. to account for noise sensitivity in the evening and nighttime, respectively. The logarithmic effect of these additions is that a 60 dBA 24-hour L_{eq} would result in a measurement of 66.7 dBA CNEL.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day, night, or over a 24-hour period. For residential uses, environmental noise levels are generally considered low when the CNEL is below 60 dBA, moderate in the 60–70 dBA range, and high above 70 dBA. Noise levels greater than 85 dBA can cause temporary or permanent hearing loss. Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet suburban residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate level noise environments are urban residential or semi-commercial areas (typically 55–60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with noisier urban residential or residential-commercial areas (60–75 dBA) or dense urban or industrial areas (65–80 dBA).

It is widely accepted that in the community noise environment the average healthy ear can barely perceive CNEL noise level changes of 3 dBA. CNEL changes from 3 to 5 dBA may be noticed by some individuals who are extremely sensitive to changes in noise. A 5 dBA CNEL increase is readily noticeable, while the human ear perceives a 10 dBA CNEL increase as a doubling of sound.

Noise levels from a particular source generally decline as distance to the receptor increases. Sound from a small, localized source (approximating a point source) radiates uniformly outward as it travels away from the source in a spherical pattern. The sound level attenuates or drops off at a range of 6 dBA for each doubling of the distance. Other factors, such as the weather and reflecting or barriers, also help intensify or reduce the noise level at any given location. A commonly used rule of thumb for roadway noise is that for every doubling of distance from the source, the noise level is reduced by about 3 dBA at acoustically "hard" locations (i.e., the area between the noise source and the receptor is nearly complete asphalt, concrete, hard-packed soil, or other solid materials) and 4.5 dBA at acoustically "soft" locations (i.e., the area between the source and receptor is normal earth or has vegetation, including grass). Noise from stationary or point sources is reduced by about 6 to 7.5 dBA for every doubling of distance at acoustically hard and soft locations, respectively. In addition, noise levels are also generally reduced by 1 dBA for each 1,000 feet of distance due to air absorption. Noise levels may also be reduced by intervening structures, such as hills, manmade features, buildings, and walls. Generally, for an at-grade facility in an average residential area where the first row of buildings cover at least 40 percent of total area, the reduction provided by the first row is reasonably assumed to be 3 dBA, with 1.5 dBA for each additional row. For buildings spaced tightly, the first row provides about 5 dBA of reduction, successive rows reduced noise by 1.5 dBA per row, with a maximum reduction limit of 10 dBA.[49] Additional noise attenuation can be provided within residential structures. Depending on the quality of the original building façade, especially windows and doors, sound insulation treatments can improve the noise reduction by 5 to 20 dBA.[50]

Ambient noise measurements were taken around the Project Site on Friday, June 11, 2021, with a Larson Davis 831 sound level meter, which conforms to industry standards set forth in ANSI S1.4-1983 (R2001) - American National Standard Specification for Sound Level Meters. Ambient noise levels taken during the monitoring events are shown in Table 8, Existing Ambient Daytime Noise Levels in Project Vicinity.

Table 8
Existing Ambient Daytime Noise Levels in Project Vicinity

ID.	Location	Primary Noise Sources	Noise Levels[a]		
			L_{eq}	L_{min}	L_{max}
A	On the north side of 126th Street, across from the Project Site	Light vehicle traffic and pedestrian activity, buses, Metro's Blue rail line	60.8	42.2	79.3
B	On the west side of Willowbrook Avenue, on the southeast corner the Project Site	Light vehicle traffic and pedestrian activity, buses, Metro's Blue rail line	63.4	45.9	80.1
C	On the east side of Willowbrook Avenue, across from the Project Site	Light vehicle traffic and pedestrian activity, buses, Metro's Blue rail line	63.0	44.9	81.6

[a] Noise measurements were taken on Friday, June 11, 2021, at three locations for a duration of 15 minutes each. See Appendix D of this IS/MND for noise monitoring location map and data output sheets.

Figure 16, Noise Monitoring and Sensitive Receptor Map, depicts the noise measurement locations fronting the adjacent residential uses as the most likely sensitive receptors to experience noise level increases during construction. The detailed noise monitoring data are presented in Appendix D, Noise Monitoring Data, and are summarized above in Table 8, Existing Ambient Daytime Noise Levels in Project Vicinity. As shown in Table 8, the ambient noise in the vicinity of the Project Site ranges from 60.8 to 63.4 L_{eq}. The maximum noise

49 California Department of Transportation, Division of Environmental Analysis, Technical Noise Supplement, November 2009.
50 Federal Transit Administration, Office of Planning and Environment, Transit Noise and Vibration Impact Assessment, May 2006.

level for three 15-minute recordings was 81.6 L_{max}, which was attributable to a transit bus passing near the noise monitor at Location C. At the time noise measurements were conducted, general sources of noise in the Project vicinity included light vehicle traffic, light pedestrian traffic, buses, and Metro's Blue rail line passing through.

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the County General Plan or noise ordinance (Los Angeles County Code, Title 12, Chapter 12.08), or applicable standards of other agencies?	☐	☒	☐	☐

A significant impact may occur if the Proposed Project would generate excess noise that would cause the ambient noise environment at the Project Site to exceed noise level standards. The County General Plan and the County Noise Control Ordinance establish standards governing noise within the County.[51,52] Implementation of the Proposed Project would result in an increase in ambient noise levels during both construction and operation, as discussed in further detail below.

Construction Noise

The County Noise Control Ordinance prohibits any tools or equipment used in construction, drilling, repair, alteration, or demolition work between weekday hours of 7:00 p.m. and 7:00 a.m. or at any time on Sundays or holidays if the noise disturbance generated from these tools or equipment crosses a residential or commercial property line.[53] The ordinance also states the contractor shall conduct construction activities in such a manner that the maximum noise levels at the affected buildings will not exceed noise levels listed in Table 9, Maximum Construction Noise Levels. Construction of the Proposed Project would require the use of heavy equipment for demolition and foundation preparation, the installation of utilities, paving, and building construction. During each construction phase there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of each activity.

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51 County of Los Angeles Department of Regional Planning, 1980, County of Los Angeles General Plan, Noise Element, website: http://planning.lacounty.gov/assets/upl/project/gp_web80-noise-element.pdf, accessed June 2021.

52 County of Los Angeles Department of Regional Planning , 2015, Los Angeles County General Plan, Chapter 11: Noise Element, website: https://planning.lacounty.gov/generalplan/generalplan, accessed June 2021.

53 County of Los Angeles, Noise Control Ordinance of the County of Los Angeles, website: https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances?nodeId=TIT12ENPR_CH12.08NOCO, accessed June 2021.

Table 9
Maximum Construction Noise Levels

	Residential Structures		
	Single-family Residential	**Multi-family Residential**	**Semi-residential / Commercial**
Mobile Equipment: Maximum noise levels for nonscheduled, intermittent, short-term operation (less than 10 days) of mobile equipment			
Daily: 7:00 a.m. to 7:00 p.m. (except Sundays and legal holidays)	75 dBA	80 dBA	85 dBA
Daily: 7:00 p.m. to 7:00 a.m., Sundays and legal holidays	60 dBA	64 dBA	70 dBA
Stationary Equipment: Maximum noise levels for repetitively scheduled and relatively long-term operation (more than 10 days) of stationary equipment			
Daily: 7:00 a.m. to 7:00 p.m. (except Sundays and legal holidays)	60 dBA	65 dBA	70 dBA
Daily: 7:00 p.m. to 7:00 a.m., Sundays and legal holidays	50 dBA	55 dBA	60 dBA
Business Structures			
Mobile Equipment: Maximum noise levels for nonscheduled, intermittent, short-term operation (less than 10 days) of mobile equipment			
Daily: all hours (including Sundays and legal holidays)	85 dBA		

Source: County of Los Angeles, Noise Control Ordinance of the County of Los Angeles, website: https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances?nodeId=TIT12ENPR_CH12.08NOCO_PT4SPNORE_12.08.440CONO, accessed June 2021.

The U.S. Environmental Protection Agency (EPA) has compiled data regarding the noise generating characteristics of specific types of construction equipment and typical construction activities. The data pertaining to the types of construction equipment and activities that are anticipated to occur at the Project Site during construction are presented in Table 10, Typical Outdoor Construction Noise Levels, at a distance of 50 feet from the noise source (i.e., reference distance). The noise levels shown in Table 10 represent composite noise levels associated with typical construction activities, which consider both the number of pieces and spacing of heavy construction equipment that are typically used during each phase of construction. Construction noise during the heavier initial periods of construction could be expected to be 86 dBA when measured at a reference distance of 50 feet from the center of construction activity. These noise levels would diminish rapidly with distance from the construction site at a rate of approximately 6 dBA per doubling of distance. For example, a noise level of 84 dBA L_{eq} measured at 50 feet from the noise source to the receptor would be reduced to approximately 78 dBA L_{eq} at 100 feet from the source to the receptor and would decline by another 6 dBA L_{eq} to 72 dBA L_{eq} at 200 feet from the source to the receptor.

Table 10
Typical Outdoor Construction Noise Levels

Construction Phase	Noise Levels at 50 Feet with Mufflers (dBA L_{eq})	Noise Levels at 60 Feet with Mufflers (dBA L_{eq})	Noise Levels at 100 Feet with Mufflers (dBA L_{eq})	Noise Levels at 200 Feet with Mufflers (dBA L_{eq})
Ground Clearing	82	80	76	70
Excavation, Grading	86	84	80	74
Foundations	77	75	71	65
Structural	83	81	77	71
Finishing	86	84	80	74

Source: United States Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971.

Sensitive Receptors

Several noise sensitive land uses are located adjacent to and in the vicinity of the Proposed Project. For purposes of assessing noise impacts on sensitive populations, the following sensitive receptors in proximity to the Project Site were identified:

1. Single-family residential immediately west of Project Site, fronting 126th Street;
2. Multi-family residential immediately south of Project Site, fronting Willowbrook Avenue and El Segundo Boulevard;
3. Single- and multi-family residential north and northwest of Project Site, north of 126th Street;
4. Single- and multi-family residential northeast of Project Site, north of 126th Street and east of Willowbrook Avenue;
5. Single- and multi-family residential east of Project Site, south of 126th Street and east of Willowbrook Avenue;
6. Tri-Community County Community School, 12721 S. Willowbrook Avenue;
7. Second Benevolent Baptist Church, 2237 E. El Segundo Boulevard;
8. Multi-family residential south of Project Site, fronting El Segundo Boulevard;
9. Single-family residential further west of Project Site, fronting 126th Street.

The locations of these land uses relative to the Project Site are depicted in Figure 16, Noise Monitoring and Sensitive Receptor Map. Photographs of the land uses immediately surrounding the Project Site are provided in Figure 5, Photographs of Surrounding Land Uses. Based on the County Noise Control Ordinance, a significant construction noise impact would occur if maximum noise levels at the affected buildings exceed noise levels listed in Table 9, Maximum Construction Noise Levels. The Project Site is immediately surrounded by a single-family residence to the west and multi-family residential buildings to the south. Due to the Project Site's proximity to these sensitive receptors, the Proposed Project would be expected to exceed the 75-dBA threshold for single-family residential structures and the 80-dBA threshold for multi-family residential structures when construction activities would occur. It is anticipated that the residences and institutional sensitive receptors located further from the Project Site would be sufficiently attenuated from construction noise and would not exceed noise thresholds. As a result, a substantial temporary or periodic increase in ambient noise levels would occur at the sensitive receptors immediately surrounding the Project Site. However, the following mitigation measures would reduce impacts related to construction noise to a less than significant level.

Mitigation Measures:

NOISE-1 Construction activities shall be restricted to occur between the hours of 7:00 a.m. and 7:00 p.m. Monday through Saturday, except for emergency work of public service utilities or by variance issued by the health officer and approved by the Los Angeles County Department of Public Works.

NOISE-2 Construction activities shall be scheduled to avoid operating several pieces of equipment simultaneously, which causes high noise levels. The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices to the extent feasible.

NOISE-3 Noise and groundborne vibration construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise- and vibration-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen propagation of noise from such activities towards these land uses to the maximum extent possible.

NOISE-4 Barriers such as, but not limited to, plywood structures or flexible sound control curtains extending eight feet in height shall be erected around the perimeter of active construction areas wherever feasible and physically possible to minimize the amount of noise during construction on the nearby noise-sensitive uses. Localized and portable sound enclosures shall be used to further significantly reduce noise from these types of equipment. Products such as Echo Barrier Outdoor noise barrier/absorbers can provide a 10- to 20-dBA noise reduction or more if the barrier is doubled up.

Operational Noise

HVAC Equipment Noise

Upon completion and operation of the Proposed Project, on site operational noise would be generated by heating, ventilation, and air conditioning (HVAC) equipment installed on the new structures. HVAC equipment typically generates noise levels of approximately 55 dBA at 50 feet from the equipment. Based on this reference noise level and the existing ambient noise levels shown in Table 8, HVAC equipment noise generated by the Proposed Project would not increase noise levels at the nearest sensitive receptors (the immediately adjacent single-family residence to the west and the multi-family residential land use to the south) or at the other sensitive receptors identified in excess of standards established in the County General Plan or noise ordinance. Standard design features including shielding would further reduce HVAC equipment noise emissions. Therefore, the Proposed Project's operational noise impacts would be less than significant.

Roadway Noise

Operation of the Proposed Project would have the potential to increase ambient noise levels through the increase in vehicle trips entering and leaving the Project Site (i.e., roadway noise). It is estimated that the existing child development center on-site generates approximately 310 average daily weekday vehicle trips, and 26 and 24 average daily Saturday and Sunday vehicle trips, respectively.[54] Operation of the Proposed Project would result in approximately 336 average daily weekday vehicle trips, and 365 and 310 average daily Saturday and Sunday vehicle trips, respectively.[55] Therefore, operation of the Proposed Project would marginally increase average daily weekday vehicle trips, as compared to existing conditions. Although the

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54 See CalEEMod sheet, Existing Conditions, provided in Appendix A to this IS/MND.
55 See CalEEMod sheet, Proposed Project, provided in Appendix A to this IS/MND.

Proposed Project would increase weekend vehicle trips above existing conditions, the increase would be similar to the number of existing weekday trips. Therefore, the Proposed Project would not introduce noise conditions that are significantly adverse as compared to existing conditions and impacts would be less than significant.

b) Generation of excessive groundborne vibration or groundborne noise levels? ☐ ☐ ☒ ☐

Vibration is sound radiated through the ground. Vibration can result from a source (e.g., subway operations, vehicles, machinery equipment, etc.) causing the adjacent ground to move, thereby creating vibration waves that propagate through the soil to the foundations of nearby buildings. This effect is referred to as groundborne vibration. The peak particle velocity (PPV) or the root mean square (RMS) velocity is usually used to describe vibration levels. PPV is defined as the maximum instantaneous peak of the vibration level and is typically used for evaluating potential building damage. RMS is defined as the square root of the average of the squared amplitude of the level. RMS velocity in decibels (VdB) is typically more suitable for evaluating human response.

The background vibration velocity level in residential areas is usually around 50 VdB. The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for most people. Most perceptible indoor vibration is caused by sources within buildings such as operation of mechanical equipment, movement of people, or the slamming of doors. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

Construction Vibration Impacts

Excavation and earthwork activities for the Proposed Project have the potential to generate low levels of groundborne vibration. The operation of construction equipment generates vibrations that propagate through the ground and diminishes in intensity with distance from the source. Vibration impacts can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage of buildings at the highest levels. Thus, construction activities associated with the Proposed Project could have an adverse impact on sensitive structures (i.e., building damage).

For purposes of addressing construction-related vibration impacts on buildings, the Los Angeles County Code (LACC Section 12.08.350) states a presumed perception threshold of 0.01 inch per second RMS; however, this threshold applies to groundborne vibrations from long-term operational activities, not construction. Consequently, as the County of Los Angeles has not adopted significance threshold to assess vibration impacts during construction, the FTA and Caltrans adopted vibration standards for buildings which are referenced to evaluate potential impacts related to project construction. This analysis uses the FTA adopted vibration standards for buildings. Based on Caltrans criteria, construction impacts relative to structural damage from groundborne vibration would be considered significant if the following thresholds were to occur as shown in Table 11, below.

Table 11
Vibration Damage Potential Threshold Criteria

Threshold Criteria	Maximum PPV (in/sec)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Structure and Condition		
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5

Source: California Department of Transportation, Transportation and Construction Vibration Guidance Manual, Chapter 7: Vibration Prediction and Screening Assessment for Construction Equipment, Table 19. September 2013.

Table 12, Vibration Source Levels for Construction Equipment, identifies various PPV and RMS velocity (in VdB) levels for the types of construction equipment that would operate at the Project Site during construction. As shown in Table 12, vibration velocities could range from 0.003 to 0.089 inch/sec PPV at 25 feet from the source activity, with corresponding vibration levels ranging from 58 VdB to 87 VdB at 25 feet from the source activity, depending on the type of construction equipment in use.

Table 12
Vibration Source Levels for Construction Equipment

Equipment	Approximate PPV (in/sec)					Approximate RMS (VdB)				
	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet
Large Bulldozer	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Caisson Drilling	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Loaded Trucks	0.076	0.027	0.020	0.015	0.010	86	77	75	72	68
Jackhammer	0.035	0.012	0.009	0.007	0.004	79	70	68	65	61
Small Bulldozer	0.003	0.001	0.0008	0.0006	0.0004	58	49	47	44	40

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, 2006.

Structural Vibration Impacts

In terms of construction vibration impacts on buildings, there are no buildings that are directly adjacent to the Project Site's property lines. The single-family residential building to the west has an approximate 8-foot setback; and the closest multi-family residential building to the south has an approximate 5-foot setback. Therefore, the Proposed Project would not have the potential to exceed the groundborne vibration thresholds for structural damage. Furthermore, protection against damage to adjacent structures is provided by existing law. The California Civil Code imposes affirmative obligations on excavating landowners to protect against damage to adjacent structures. Civil Code Section 832 requires that excavating owners give notice of the excavation to owners of adjoining lands and buildings, use ordinary care and skill and take reasonable precautions to sustain adjoining land. Civil Code Section 832 also imposes additional obligations on owners excavating deeper than nine feet. Thus, the Proposed Project would not involve any deep excavations or any

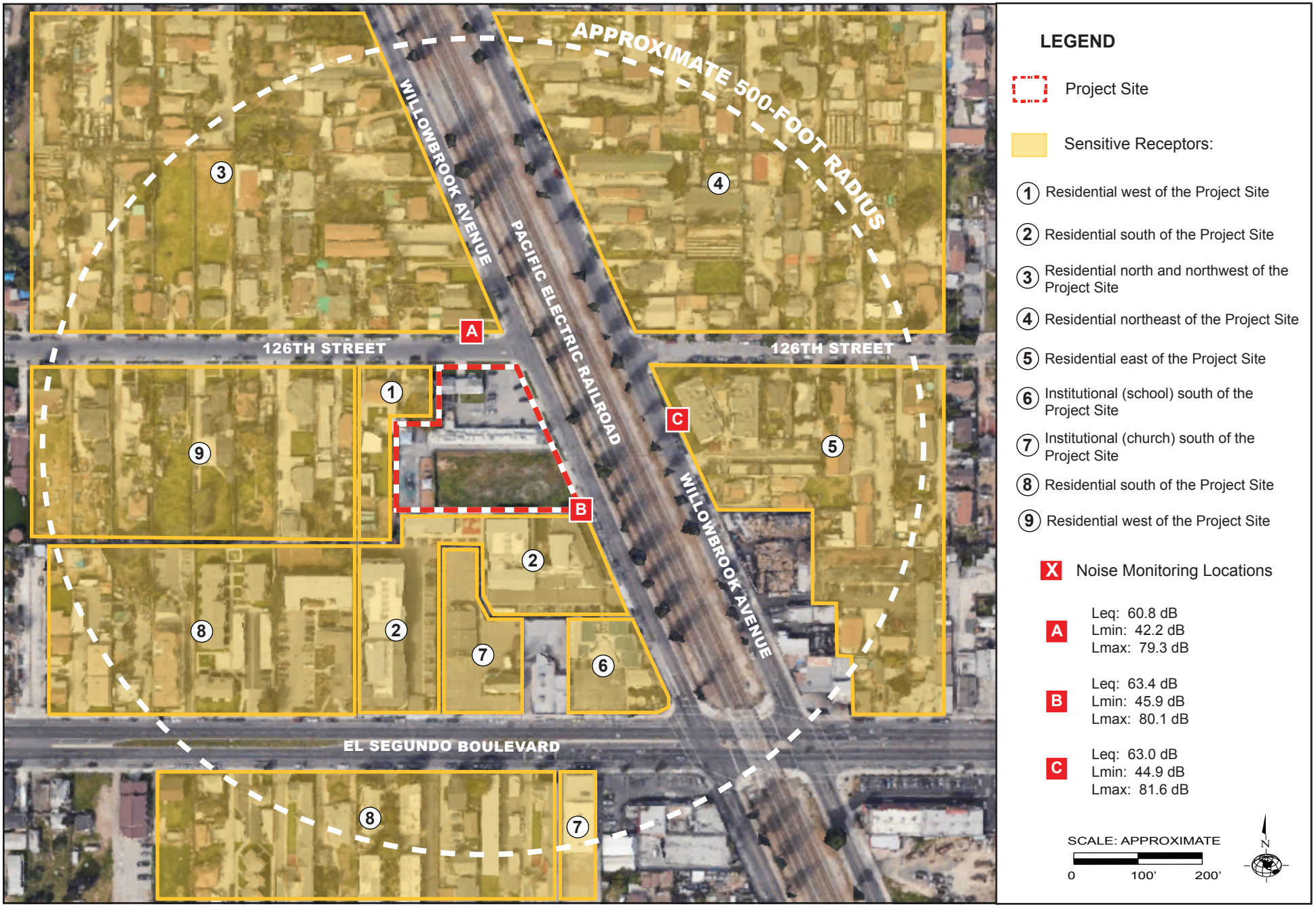
subterranean levels and would only be limited to surface structural work for the building foundations. As such, the Proposed Project's construction activities would have a less than significant impact upon any surrounding structures from groundborne vibration impacts.

Operational Vibration Impacts

The Proposed Project is a multi-family residential development and would not involve the use of stationary equipment that would result in high vibration levels. Although groundborne vibration at the Project Site and immediate vicinity may currently result from heavy-duty vehicular travel (e.g., refuse trucks and transit buses) along Willowbrook Avenue and 126th Street, the proposed land uses would not result in a substantial increase in the use of these heavy-duty vehicles on the public roadways. While refuse trucks would be used for the removal of solid waste at the Project Site, the collection of refuse would most likely occur once a week. As such, vibration impacts associated with operation of the Proposed Project would be less than significant.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

The nearest public use general aviation airport is the Compton/Woodley Airport, which is located 2.6 miles south of the Project Site at 901 W. Alondra Boulevard in the City of Compton. The Project Site is currently zoned R-1 (Single-Family Residence). The Applicant is requesting a Zone Change from R-1 to R-3 (Limited Density Multiple Residence) to accommodate the Proposed Project. Additionally, the County's General Plan land use designation for the entire site is H9 (Residential: 0-9 du/net ac). The Applicant is proposing a General Plan Amendment from the existing General Plan land use designation of H9 to the General Plan land use category of H30 (Residential: 0-30 du/net ac) for the Proposed Project. The Proposed Project, in both the existing General Plan and the Draft General Plan, is not located within a public Airport Land Use Plan area, nor located near an existing airport or airstrip, and would therefore not expose the project area to excessive noise levels. Therefore, no impact would occur.



Source: Google Earth, Aerial View, 2021.

PARKER ENVIRONMENTAL CONSULTANTS

Figure 16
Noise Monitoring and Sensitive Receptors

14. POPULATION AND HOUSING

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐

The Proposed Project is located within the neighborhood of Willowbrook in unincorporated Los Angeles County, which is currently served by local and regional infrastructure including existing public roads, public utilities (sewers, water, natural gas, electricity), services (fire, police, schools, parks), and public transit. The Proposed Project involves the construction of a 51-unit affordable housing development. As shown in Table 13, below, SCAG's Connect SoCal population and household growth forecast from 2016 through 2045 for the County's unincorporated area envisions 213,00 additional persons, 124,500 housing units, and 51,000 jobs, yielding growth rates of approximately 20%, 42% and 19%, respectively.[56]

Based on SCAG's population and household projections for 2045, which averages approximately 3 persons per household, the Proposed Project is expected to generate approximately 153 additional residents. The additional 153 persons generated by the Proposed Project represents approximately 0.07 percent of the forecasted population growth in 2045 and approximately 0.04 percent of the forecasted housing unit growth by 2045. This is also a conservative estimate as it assumes all future residents are currently not residing in unincorporated Los Angeles County. No commercial uses are proposed as part of the Project, thus, generally no new employees would be generated by the new development. In summary, the proposed increase in housing units and population as a result of the Proposed Project is substantially within SCAG's Connect So Cal growth forecast. The Proposed Project would not induce substantial population growth in the area. Therefore, impacts would be less than significant.

Table 13
SCAG's Connect SoCal Growth Forecast for Unincorporated Areas for Los Angeles County

Projection Year	Population	Households	Employment
2016	1,044,500	294,800	269,100
2045	1,258,000	419,300	320,100
Growth from 2016 to 2045			
No. of Population/ Households/Employment	213,500	124,500	51,000
Percent Change	20%	42%	19%

Source: SCAG, Connect SoCal Technical Report, Demographics and Growth Forecast Appendix, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf. Accessed June 2021.

[56] Southern California Association of Governments, Connect SoCal: The 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy, September 3, 2020, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176. Accessed June 2021.

b) Displace substantial numbers of existing people or housing, especially affordable housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

The Project Site is currently occupied by a child development center, consisting of three buildings, and two undeveloped, vacant parcels. No displacement of existing housing or residents would occur with the Proposed Project. Therefore, no impact would occur.

15. PUBLIC SERVICES

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
a) Would the project create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?	☐	☐	☒	☐

The Los Angeles County Fire Department (LACFD) provides fire services to all unincorporated areas of the County and 58 cities. The Project Site is served by two LACFD stations: LACFD Station No. 41, located at 1815 E. 120th Street (approximately 0.4 mile north of the Project Site); and LACFD Station No. 147, located at 3161 E. Imperial Hwy (approximately 1.3 miles west of the Project Site). Both LACFD stations provide Emergency Medical Services (EMS), fire and rescue services and safe haven services for unincorporated Los Angeles County.[57] Should the need arise for additional resources, LACFD and/or the surrounding City of Compton would respond to the Project Site.

The Proposed Project could potentially increase the demand for LACFD services. The Proposed Project would include a total of 51 housing units and as discussed in Section 14. Population and Housing, approximately 153 additional residents. As discussed in Section 14., the Proposed Project's estimated population is consistent with the SCAG population growth forecast for the unincorporated areas of the County. Additionally, the statutory responsibilities of the LACFD Forestry Division includes erosion control, watershed management, rare and endangered species, vegetation fuel modification for Very High Fire Hazard Severity Zones (VHFHSZ), archaeological and cultural resources, and the County Oak Tree Ordinance. As discussed in Section 7, Geology and Soils, impacts with respect to erosion would be less than significant with implementation of a SWPPP, erosion controls, and BMPs to meet the NPDES requirements for storm water quality. The Proposed Project would also result in less than significant impacts to watershed management and rare and endangered species because the Project Site is located in an urban area, and as discussed in Section 4. Biological Resources, the Project Site is otherwise void of habitat suitable to support special-status species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. The Proposed Project would result in no impacts to the County Oak Tree Ordinance because no oak trees or other unique native trees are present on the Project Site. Furthermore, the Proposed Project would result in no impacts to vegetation fuel modification for VHFHSZ because, as discussed in Section 9. Hazards and Hazardous Materials, the Project Site is located in an urban setting and is not located in a VHFHSZ.[58]

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57 Los Angeles County Fire Department, website: https://locator.lacounty.gov/fire, accessed June 2021.

58 Cal Fire, Los Angeles County FHSZ Map, website: https://osfm.fire.ca.gov/media/6705/fhszs_map19.pdf, accessed June 2021.

Thus, fire protection would be considered adequate for the Proposed Project. Additionally, the Proposed Project would comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows and fire hydrants. Furthermore, design requirements would be specified during site plan review for certain components of the Proposed Project (driveway widths and turning radii) to facilitate the LACFD's access to the Project Site in the event of a fire. Development of the Proposed Project would not necessitate the construction of a new fire station as any increase in fire service demands would be relatively minimal. Therefore, impacts associated with fire protection would be less than significant.

Sheriff protection? ☐ ☐ ☒ ☐

The Los Angeles County Sheriff's Department (LACSD) provides sheriff protection to the unincorporated area of the County. The nearest LACSD is the Century Station located 1.5 miles northeast of the Project Site at 11703 Alameda Street in Lynwood. The LACSD has mutual aid agreements with all Los Angeles County law enforcement agencies for assistance. Mutual aid can be requested from one or all agencies if an emergency requires a major response. The Project Site is also approximately 2 miles north of the Compton Sherriff Station, located at 301 S. Willowbrook Avenue in Compton, which would provide additional services to the Project Site if needed.

The Proposed Project would result in an increase of site visitors and residents within the Project Site, thereby generating a potential increase in number of service calls from the Project Site. The Proposed Project would implement design features that would reinforce on-site security. These features would include sufficient lighting throughout the Project Site to ensure safety and visibility. Entryways and parking areas would also be well illuminated and designed to eliminate areas of concealment. It is anticipated these features would not necessitate the construction of a new sheriff's station and any increase in law enforcement services demands would be relatively minimal. Therefore, impacts associated with sheriff protection would be less than significant.

Schools? ☐ ☐ ☒ ☐

The Project Site is located within the service area of the Compton Unified School District (CUSD). The nearest school to the Project Site is King Elementary School (serving Kindergarten through 5th grade), located 0.4 mile northeast of the Project Site, at 2270 E. 122nd Street; Bunche Middle School (serving 6th through 8th grade), located 0.5 mile northeast of the Project Site at 12338 Mona Boulevard; and Centennial High School (serving 9th through 12th grade), located 1.5 miles west of the Project Site at 2600 N. Central Avenue.[59] Table 14, Proposed Project Estimated Student Generation, below, shows the number of school age residents the Proposed Project would generate. The Proposed Project would involve the construction of 51 units of affordable housing. The Proposed Project may increase enrollment by 12 elementary school students, approximately 3 middle school students, and 7 high school students, and 1 Special Daily Class student, totaling approximately 23 students.

The CUSD is expected to accommodate this marginal increase in students. The manner in which CUSD would accommodate the additional students resulting from the Proposed Project would be subject to separate planning by CUSD. Upgrades to existing schools and the construction of new schools is addressed by the CUSD's Facilities Department, which is responsible for the execution of the District's current bond programs,

[59] Compton Unified School District, School Locator, website: https://locator.decisioninsite.com/?StudyID=216387, accessed June 2021.

the maintenance and operations of schools, the utilization of existing assets, and master planning for future projects.[60]

In addition, the Applicant would be required to pay the mandatory school district development fees to offset the Proposed Project's demands upon local school facilities. Senate Bill 50 (SB 50) which passed in 1998, established a process for determining the amount of fees developers may be charged to mitigate the impact of development on school facilities. Under this bill, a school district could charge fees above the statutory cap only under specified conditions, and then only up to the amount of funds that the district would be eligible to receive from the state. Pursuant to Government Code Section 65995, the development fees authorized by SB 50 are deemed to be "full and complete school facilities mitigation."[61] As a result, the Proposed Project's impacts on school facilities would be less than significant.

Table 14
Proposed Project Estimated Student Generation

Land Use	Size	Elementary School Students	Middle School Students	High School Students	SDC Students	Total Students
Proposed Project						
Multi-Family Residential	51 du	12	3	7	1	23
Net Student Generation:		**12**	**3**	**7**	**1**	**23**

Notes: du = dwelling units; SDC = special daily class
Student generation rates are as follows for multi-family residential uses: 0.2269 elementary, 0.0611 middle, 0.1296 high school, and 0.0194 SDC students per dwelling unit.
Source: 2020 Developer Fee Justification Study, Los Angeles School District, https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/921/LAUSD%20Dev%20Fee%20Study%202020_Final.pdf. Accessed November 2021.

Parks?	☐	☐	☒	☐	

There are seven County parks within a 2-mile radius of the Project Site.[62] These parks and facilities serve the existing recreational needs of the surrounding community. The Proposed Project would introduce approximately 153 new residents to the area, which would increase demands upon park and recreational facilities in the unincorporated area of the County. The County's General Plan states the County's threshold for recreation and open space is 4 acres per 1,000 residents in unincorporated areas.[63] The Proposed Project would generate the need for 0.62 acres of recreation and open space. As shown in Table 15, below, the total available Los Angeles County parkland available within 2 miles of the Project Site is approximately 136 acres. As discussed in Section 14. Population and Housing, the Proposed Project's estimated population is consistent with the SCAG population growth forecast for the unincorporated area of the County. Additionally, the Proposed Project will provide 17,000 square feet of common open space area on the ground floor. The

60 Compton Unified School District, Facilities Department, website: https://www.compton.k12.ca.us/departments/business-services/facilities/home, accessed June 2021.
61 California Government Code, Section 65996-65998, website: https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV&sectionNum=65995, accessed June 2021.
62 County of Los Angeles, Department of Parks and Recreation, website: http://parks.lacounty.gov/wps/portal/dpr/parkslocator/, accessed June 2021.
63 County of Los Angeles Department of Regional Planning, 2015, Los Angeles County General Plan, Chapter 10: Parks and Recreation Element, website: http://planning.lacounty.gov/generalplan/existing, accessed June 2021.

Proposed Project will also feature 25,004 square feet of proposed landscaped area. These Proposed Project amenities would serve to reduce or offset demand for off-site park services in the surrounding area. Therefore, the Proposed Project would not create capacity or service level problems or result in substantial adverse physical impacts associated with parks. As such, impacts would be less than significant.

Table 15
Los Angeles County Recreation and Park Facilities within the Project Area

Park Name	Approx. Park Size (acres)	Park Amenities	Approx. Distance to Project Site (miles)
1. Mona Park	8.4	Basketball courts, baseball fields, picnic tables, children's play area, community center, BBQ amenities, swimming pool, gymnasium	0.4
2. Faith and Hope Park	0.4	Picnic tables, exercise and fitness amenities	0.7
3. Martin Luther King Jr. Fitness Garden	0.5	Exercise and fitness amenities, walking path	0.7
4. George Washington Carver Park	7.22	Basketball courts, baseball fields, picnic tables, children's play area, community center, BBQ amenities, swimming pool, gymnasium, outdoor stage	1.5
5. Compton Creek Nature Park and Walking/Bike Path	5	Natural habitat, walking paths, grassy areas, fitness equipment, picnic areas, a multi-use amphitheater, community plaza, and interpretive signage.	1.5
6. Earvin "Magic" Johnson Recreational Center	104	Children's play areas, picnic areas with barbecue grills, restrooms, soccer fields, two fishing lakes, walking path	1.8
7. Enterprise Park	10	Basketball courts, baseball and soccer fields, picnic tables, children's play area, community center, BBQ amenities, swimming pool, gymnasium	1.9
TOTAL Acreage:	**136**		

Sources: Park distance from the Project Site, size, and amenities were determined using:
Parks Locator, Department of Parks and Recreation, County of Los Angeles, https://parks.lacounty.gov/park-search-2/; accessed June 2021 and Google Earth, accessed June 2021.

The Quimby Act

The California Quimby Act, which is part of the Subdivision Map Act, applies to residential subdivisions and permits the County, by ordinance, to require the dedication of land or payment of fees for park and recreational purposes. Consistent with the provisions of the Quimby Act, County Code Section 21.24.340 (Residential Subdivisions, Local Park Space Obligation, Formula) contains the methodology used to determine the amount of parkland required to be dedicated by the subdivision map approval process. In accordance with Section 21.28.140, developers may choose to pay a fee in-lieu of the provision of parkland. Because the Proposed Project is not a subdivision, County Code Sections 21.24.340 and 21.24.140 do not apply to the Project.

Libraries? ☐ ☐ ☒ ☐

The nearest libraries to the Project Site are the Willowbrook Library, located at 11737 Wilmington Avenue, approximately 0.8 miles north of the Project Site, and the Compton Library located at 240 W. Compton Boulevard, approximately 1.7 miles south of the Project Site. The Willowbrook Library is a 7,797 square foot facility that provides a children's area and teen space.[64] The Compton Library is a 20,542 square foot facility that also provides a children's area and teen space.[65] As discussed in Section 14. Population and Housing, the Proposed Project's estimated population is consistent with the SCAG population growth forecast for the unincorporated area of the County. Thus, the Proposed Project would not create capacity or service level problems or result in substantial adverse physical impacts associated with libraries. Therefore, impacts would be less than significant.

Other public facilities? ☐ ☐ ☐ ☒

As discussed in Section 14. Population and Housing, the Proposed Project's estimated population is consistent with the SCAG population growth forecast for the unincorporated area of the County. No additional public facilities would be affected by the implementation of the Proposed Project. Thus, the Proposed Project would not create capacity or service level problems or result in substantial adverse physical impacts associated with other public facilities. Therefore, no impacts would occur.

64 County of Los Angeles, Public Library, Willowbrook Library, website: https://lacountylibrary.org/willowbrook-library/, accessed June 2021.
65 County of Los Angeles, Public Library, Compton Library, website: https://lacountylibrary.org/compton-library/, accessed June 2021.

16. RECREATION

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐

As discussed above in Section 15. Public Services (a) Parks, there are seven County parks within a 2-mile radius of the Project Site.[66] These parks and facilities serve the existing recreational needs of the surrounding community. The Proposed Project would introduce approximately 153 new residents to the area, which would increase demands upon park and recreational facilities in the unincorporated area of the County. The County's General Plan states the County's threshold for recreation and open space is 4 acres per 1,000 residents in unincorporated areas.[67] The Proposed Project would generate the need for 0.62 acres of recreation and open space. As shown in Table 15, above, the total available Los Angeles County parkland available within 2 miles of the Project Site is approximately 136 acres. As discussed in Section 14. Population and Housing, the Proposed Project's estimated population is consistent with the SCAG population growth forecast for the unincorporated area of the County. Additionally, the Proposed Project will provide 17,000 square feet of common open space area on the ground floor, which includes a community room, a computer room, office space and exterior open space. The Proposed Project will also feature 25,004 square feet of proposed landscape area. These Proposed Project amenities would serve to reduce or offset demand for off-site park services in the surrounding area. Therefore, the Proposed Project would not create capacity or service level problems or result in substantial adverse physical impacts associated with parks or recreation facilities. As such, impacts would be less than significant.

b) Does the project include neighborhood and regional parks or other recreational facilities or require the construction or expansion of such facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

The Proposed Project involves the construction of a 51-unit affordable housing development. Additionally, the Proposed Project will provide 17,000 square feet of common open space area on the ground floor, which includes a community room, a computer room, office space and exterior open space. The Proposed Project will also feature 25,004 square feet of proposed landscaped area. The Proposed Project would not include development of neighborhood or regional parks. The Proposed Project would not require the construction or expansion of such facilities. Therefore, no impact would occur.

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66 County of Los Angeles, Department of Parks and Recreation, website: http://parks.lacounty.gov/wps/portal/dpr/parkslocator/, accessed June 2021.

67 County of Los Angeles Department of Regional Planning, 2015, Los Angeles County General Plan, Chapter 10: Parks and Recreation Element, website: http://planning.lacounty.gov/generalplan/existing, accessed June 2021.

c) Would the project interfere with regional trail connectivity? ☐ ☐ ☐ ☒

The Proposed Project involves the construction of a 51-unit affordable housing development on a Project Site that is occupied by child development center and undeveloped parcels. The Project Site is bordered by infill urban development and roadways and is not connected to nor is it a part of any regional open space network. Additionally, the Proposed Project is not located within a regional open space area or trail system.[68] As a result, the Proposed Project would not interfere with regional open space connectivity. Therefore, no impact would occur.

[68] County of Los Angeles, Department of Regional Planning Commission, 2015, Los Angeles County General Plan, Chapter 10: Parks and Recreation Element, Figure 10: Regional Trail System, website: http://planning.lacounty.gov/generalplan/existing, accessed June 2021.

17. TRANSPORTATION

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project:				
a) Conflict with an applicable program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☐	☒

The Project Site is served by bus and rail transit lines operated by Metro and LACDPW Transit (The Link-Willowbrook). The Metro Bus Stop serving Line 202 is located 0.1 mile south of the Project Site at the intersection of S. Willowbrook Avenue and El Segundo Boulevard. Metro's Blue Line runs parallel to the Project Site to the east of S. Willowbrook Avenue. Metro's Willowbrook/Rosa Parks Blue Line rail station is located approximately 0.8 mile north of the Project Site at the intersection of S. Willowbrook Avenue and S. 117th Street. Metro's Compton Blue Line rail station is located 1.5 miles south of the Project Site near the intersection of E. Compton Boulevard and S. Willowbrook Avenue. The Link-Willowbrook bus stop serving the Project Site immediately fronts the Project Site at the intersection of E. 126th Street and S. Willowbrook Avenue. The Proposed Project would not require the disruption of public transportation services or the alteration of public transportation routes.

The Proposed Project would not be expected to conflict with the County General Plan Mobility Element or the LACDPW Bicycle Master Plan.[69,70] S. Willowbrook Avenue, to the immediate east of the Project Site, is proposed as a Class III Bike Route under the County's Bicycle Master Plan. The Proposed Project would improve the pedestrian experience along S. Willowbrook Avenue by providing sidewalk improvements, removing the two existing driveways, and providing a landscaped setback that includes trees. Additionally, as discussed in the response to Section 11. Land Use and Planning (b), the Proposed Project is consistent with the goals and policies of SCAG's Connect SoCal. Thus, the Proposed Project would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities and no impact would occur.

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐

CEQA Guidelines Section 15064.3(b)(1) states for land use projects, vehicle miles traveled (VMT) exceeding an applicable threshold of significance may indicate a significant impact. The County has adopted LACDPW's Transportation Impact Analysis Guidelines[71], which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts in conformance with SB 743. Based on Section 3.1.2.4. – Residential Land Use Based Screening Criteria, of the County's Transportation Impact Analysis Guidelines, the Proposed Project would be exempt from requiring a Transportation Impact Analysis. The Proposed Project would develop 51 affordable housing units. 100%

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69 County of Los Angeles Department of Regional Planning, 2015, Los Angeles County General Plan, Chapter 7: Mobility Element, website: http://planning.lacounty.gov/generalplan/existing, accessed June 2021.

70 County of Los Angeles, Department of Public Works, 2012 Bicycle Master Plan, website: https://pw.lacounty.gov/tpp/bike/masterplan.cfm, accessed June 2021.

71 Los Angeles County, Department of Public Works, Transportation Impact Analysis Guidelines, July 23, 2020, website: https://pw.lacounty.gov/traffic/trafficreportmsg.cfm, accessed June 2021.

of the dwelling units would be set aside for lower income households. Although the Project is not located within a high-quality transit corridor, the Proposed Project would provide 28 long-term and six short-term bicycle parking spaces to promote non-auto travel and is located within walking distance to Metro and The Link bus stops and Metro's Blue Rail Line. The Project Site is also located within walking distance to commercial and community amenities, which would also promote non-auto travel. Lastly, as discussed in Section 11. Land Use and Planning (b), the Proposed Project would be substantially compliant with SCAG's Connect SoCal, which aims to reduce regional VMTs. Although the Proposed Project would increase development on the Project Site, as compared to existing conditions, the Proposed Project would further the State's affordable housing goals and is consistent with the County's screening exemption criteria pursuant to the County's Transportation Impact Analysis Guidelines. Therefore, impacts would be less than significant.

c) Substantially increase hazards due to a road design feature (e.g., sharp curves) or incompatible uses (e.g., farm equipment)? ☐ ☐ ☒ ☐

The Project Site is currently occupied by a child development center and two partially vacant parcels. Vehicular access to the Project Site is currently provided by one ingress/egress driveway on S. Willowbrook Avenue, to access surface parking associated with the a child development center. A driveway is present to access the two partially vacant lots from S. Willowbrook Avenue but is not currently in use. The Proposed Project would provide a new ingress/egress driveway at the northwest corner of the Project Site from 126th Street and remove the two existing driveways along S. Willowbrook Avenue. The Proposed Project would include 23 surface parking spaces along the western boundary of the Project Site. The Proposed Project would not involve the long-term closure of any public roadway. Temporary road closures may occur during construction and utility connections. The Proposed Project would not substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses. Therefore, impacts would be less than significant.

d) Result in inadequate emergency access? ☐ ☐ ☐ ☒

The Proposed Project would not involve the long-term closure of any public roadway. Temporary road closures may occur during construction and utility connections. Access to the Project Site would be provided via a full-access driveway on 126th Street. As discussed in Section 15. Public Services, (a) Fire, design requirements would be specified during site plan review for certain components of the Proposed Project (driveway widths and turning radii) to facilitate the LACFD's access to the Project Site in the event of a fire or other emergencies. As such, the Proposed Project would be required to be designed in such a way as to provide adequate emergency access. Thus, the Proposed Project would not impede emergency access on-site or off-site. The Proposed Project would not result in inadequate emergency access to the Project Site or to nearby properties. Therefore, no impact would occur.

18. TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) **Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code § 5020.1(k), or**	☐	☒	☐	☐

The Project Site includes one developed parcel and two partially vacant parcels. The developed parcel (APN. 6152-002-021) is currently occupied by a child development center consisting of three one-story buildings and associated surface parking. The Proposed Project would include the demolition of the existing buildings. As discussed in Section 5, Cultural Resources, the Project Site and the surrounding properties are located in an urbanized area that has been previously developed and disturbed by past activities. Based on the Project Site's past commercial and institutional uses and disturbance of soil, development of the Proposed Project would not directly or indirectly destroy a historical or archaeological resource of cultural value to a California Native American tribe. The Proposed Project is not expected to disturb any archaeological resources during construction of the Proposed Project, as minimal ground excavation would occur. No significant below grade excavation would occur during construction other than to a modest depth (less than 5 feet below existing grade) for site clearing, grading, and building foundation preparation. Nonetheless, there is still a possibility that construction of development on-site could encounter previously unknown and unrecorded resources, if any should exist below grade. Because the presence or absence of such materials cannot be determined until earthwork activities begin, the Proposed Project shall adhere to Mitigation Measure CUL-1 for proper handling of any archaeological resources discovered during construction, as well as Mitigation Measures TRC-1 and TRC-2, below to ensure that if any tribal cultural resources (TCR) are encountered during construction, impacts to such resources would be reduced to a less than significant level.

ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

The Public Resources Code requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. Project notification letters were issued via mail and email to California Native American Tribes which have requested formal notification. Consultation with the Gabrieleno Band of Mission Indians (Kizh Nation) commenced on September 23, 2021 and has since concluded. Based on consultation with the Gabrieleno Band of Mission Indians (Kizh Nation) (Tribe), there is still a possibility that construction of development on-site could inadvertently unearth previously unknown and unrecorded tribal cultural resources and/or human remains, if any should exist below grade. Because the presence or absence of such materials cannot be determined until earthwork activities begin, the Proposed Project shall adhere to Mitigation Measures TRC-1 and TRC-2, below to ensure that if any tribal cultural resources are encountered during construction, impacts to such resources would be reduced to a less than significant level.

Mitigation Measures:

TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities

A. The project applicant/developer shall retain a Native American monitor from (or approved by) the Gabrieleño Band of Mission Indians – Kizh Nation (the "Kizh" or the "Tribe") - the direct lineal descendants of the project location. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project, at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" includes, but is not limited to, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. However, after good faith effort to retain a tribal monitor, if the Tribe is non-responsive or unable to provide an on-site monitor at the time of ground disturbing activities, the lead agency may require a third-party monitor and will determine the point at which the applicant may proceed with construction.
B. A copy of the executed monitoring agreement shall be provided to the lead agency prior to the earlier of the commencement of any ground-disturbing activity for the project, or the issuance of any permit necessary to commence a ground-disturbing activity. If a monitoring agreement cannot be obtained, the Applicant shall provide the lead agency with written records demonstrating a good faith effort has been made to engage a tribal monitor from the Gabrieleño Band of Mission Indians – Kizh Nation.
C. The project applicant/developer shall provide the Tribe with a minimum of 30 days advance written notice of the commencement of construction so that the Tribe has sufficient time to secure and schedule a monitor for the project. The Applicant shall provide the Tribe advanced notice of any scheduling changes pertaining to ground disturbing activities.
D. The project applicant/developer shall hold at least one (1) pre-construction sensitivity/educational meeting prior to the commencement of any ground-disturbing activities, where a senior member of the Tribe will inform and educate the project's construction and managerial crew and staff members

(including any project subcontractors and consultants) about the TCR mitigation measures and compliance obligations, as well as places of significance located on the project site (if any), the appearance of potential TCRs, and other informational and operational guidance to aid in the project's compliance with the TCR mitigation measures.

E. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs shall be provided to the project applicant/developer and lead agency on a weekly basis.
F. Native American monitoring for the project shall conclude upon the latter of the following: (1) written confirmation from a designated project point of contact to the Tribe that all ground-disturbing activities and all phases that may involve ground-disturbing activities on the project site and at any off-site project location are complete; or (2) written notice by the Tribe to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase (known by the Tribe at that time) at the project site and at any off-site project location possesses the potential to impact TCRs.

TCR-2: Discovery of TCRs, Human Remains, and/or Grave Goods

A. Upon the discovery of a TCR, all construction activities in the immediate vicinity of the discovery (i.e., not less than the surrounding 25 feet) shall cease. The monitor shall evaluate the TCR and advise the project manager regarding the matter, protocol, and any mitigating requirements. No project construction activities shall resume in the surrounding 25 feet of the discovered TCR unless and until the Tribe has completed its assessment/evaluation/recovery of the discovered TCR and surveyed the surrounding area.
B. The Tribe will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate in its sole discretion, and for any purpose the Tribe deems appropriate, including but not limited to, educational, cultural and/or historic purposes.
C. If Native American human remains and/or grave goods are discovered or recognized on the project site or at any off-site project location, then all construction activities shall immediately cease in the vicinity of the remains. Native American "human remains" are defined to include "an inhumation or cremation, and in any state of decomposition or skeletal completeness." (Pub. Res. Code § 5097.98 (d)(1).) Funerary objects, referred to as "associated grave goods," shall be treated in the same manner and with the same dignity and respect as human remains. (Pub. Res. Code § 5097.98 (a), d)(1) and (2).)
D. Any discoveries of human skeletal material or human remains shall be immediately reported to the County Coroner (Health & Safety Code § 7050.5(c); 14 Cal. Code Regs. § 15064.5(e)(1)(B)), and all ground-disturbing project ground-disturbing activities on site and in any other area where the presence of human remains and/or grave goods are suspected to be present, shall immediately halt and remain halted until the coroner has determined the nature of the remains. (14 Cal. Code Regs. § 15064.5(e).) If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, within 24 hours, the Native American Heritage Commission, and Public Resources Code Section 5097.98 shall be followed.
E. Thereafter, construction activities may resume in other parts of the project site at a minimum of 50 feet away from discovered human remains and/or grave goods, if the Tribe determines in its sole discretion that resuming construction activities at that distance is acceptable and provides

the project manager express consent of that determination (along with any other mitigation measures the Tribal monitor deems necessary). (14 Cal. Code Regs. § 15064.5(f).)

F. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or grave goods.

19. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐

A significant impact may occur if a project would increase demands upon infrastructure to such a degree that the construction or relocation of facilities currently serving the Project Site would result in significant environmental impacts.

Water

The Golden State Water Company's (GSWC) Central District water system currently serves the Project Site vicinity.[72] Additionally, the Los Angeles County Waterworks Districts (LACWD), a division of the LACDPW, would provide water supply to the unincorporated area of the County if need be. LACWD's potable water comes from three sources: local groundwater, water imported through the State Water Project (SWP), and the Colorado River Aqueduct (CRA). The LACWD purchases imported water from the local SWP contractor, Metropolitan Water District of Southern California (MWD), to service the water in the Project vicinity.

As shown in Table 16, Proposed Project Estimated Water Generation, below, the Proposed Project would generate a net demand for approximately 9,286 gallons per day (gpd). Based on the estimates provided, implementation of the Proposed Project is not expected to measurably increase the demand for water for the GSWC's Central District. Of the total available capacity for CRA and nine reservoirs of MWD, the Proposed Project would account a negligible percent, and no new or expanded water treatment facilities would be required during normal, dry, or multiple dry years. With respect to water treatment facilities, the Proposed Project would have a less than significant impact.

Wastewater

Sewage from the Project Site is conveyed via County sewer infrastructure to the Joint Water Pollution Control Plant (JWPCP). The JWPCP treats an average daily flow of 259 mgd and has the capacity to treat 400 mgd. This equals a remaining capacity of 141 mgd of wastewater able to be treated at the JWPCP.[73,74] As shown in Table 17, Proposed Project Estimated Wastewater Generation, below, the Proposed Project would generate approximately 7,747 gpd of wastewater. The Proposed Project is expected to constitute a negligible amount of wastewater treated at the JWPCP. Of the remaining capacity to treat 141 additional mgd, the Proposed Project represents a fraction of one percent of the available capacity. Therefore, impacts to sewer capacity

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72 The Golden State Water Company (GSWC) provided a Will Serve Letter for the Proposed Project. See Appendix E, Consultation Letters.
73 Los Angeles County Sanitation Districts, https://www.lacsd.org/facilities/?tab=2, accessed June 2021.
74 Los Angeles County Sanitation Districts, Will Serve Letter for Willowbrook III, dated June 24, 2021. See Appendix E, Consultation Letters.

and infrastructure would be less than significant.

Stormwater

Runoff from the Project Site currently is and would continue to be collected on-site and directed towards existing storm drains**.** The Proposed Project will be required to demonstrate compliance with the SWPPP, which would reduce the amount of surface water runoff after storm events, as the Proposed Project would be required to implement Stormwater BMPs. Therefore, the Proposed Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems and impacts would be less than significant.

Electricity and Natural Gas

As discussed in Section 6. Energy, the Proposed Project's energy demands during construction would be typical of construction projects of this size and would not necessitate additional energy facilities or distribution infrastructure or cause wasteful, inefficient, or unnecessary consumption of energy. During the Proposed Project's operation, implementation of code compliance measures would ensure the Proposed Project meets the minimum California Title 24 and Los Angeles County Green Building Standards Code energy efficiency requirements and further reduce demand for electricity, including peak power demands. Specifically, the Proposed Project would include energy efficient lighting fixtures, low-flow water features, and energy efficient mechanical heating and ventilation systems. Additionally, Southern California Edison (SCE) and the Southern California Gas Company (SoCalGas) would confirm the availability of electric and natural gas service connections, respectively, for the Proposed Project. As development of the Proposed Project would result in a less than significant impact with respect to energy and natural gas consumption, it is anticipated that the demands of the Proposed Project would not exceed the capacity of existing energy and natural gas systems and impacts would be less than significant.

Telecommunications

Telecommunication services within the County are provided by several commercial service providers, including AT&T, Charter/Spectrum, Cox Communications, and Frontier. The Project Site is currently developed and is served by existing telecommunications infrastructure. To the extent that the Proposed Project requires relocation, upgrades or hook ups of on-site telecommunications infrastructure, installation would primarily take place onsite, with minor off-site work associated with connections to the public system. No upgrades to off-site telecommunications systems are anticipated. Any work that may affect services to the existing energy and telecommunications lines would be coordinated with service providers. Operation of the Proposed Project would not require or result in the relocation or construction of new or expanded telecommunications facilities. Thus, impacts would be less than significant.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? ☐ ☐ ☒ ☐

Existing Infrastructure

As discussed above under question (a), the GSWC Central District water system currently serves the Project Site vicinity.[75] Additionally, the LACWD, a division of the LACDPW, would provide water supply to the unincorporated area of the County if need be. LACWD's potable water comes from three sources: local groundwater, water imported through the SWP and the CRA. The LACWD purchases imported water from the local SWP contractor, MWD, to service the water in the Project vicinity.

MWD delivers an average of 3.8 mgd to a service area of approximately 26 member agencies – 14 cities, 11 municipal water districts, and one county water authority which in turn provides water to more in the Los Angeles, Orange, San Diego, Riverside, San Bernardino, and Ventura counties. The Metropolitan Water District is comprised of numerous facilities including the Colorado River Aqueduct, sixteen hydroelectric facilities, five water treatment plants, and nine reservoirs (with a total capacity of 957.1 mgd).[76]

The MWD 2020 Regional UWMP (RUWMP) addresses the future of MWD's water supplies and demand through the year 2045.[77] Evaluations are prepared for average year conditions, single dry-year conditions, and multiple dry-year conditions. The analysis for multiple-dry year conditions, i.e. under the most challenging weather conditions such as drought and service interruptions caused by natural disasters, is presented in Table 2-4 of the 2020 RUWMP.[78] The analysis in the 2020 RUWMP concluded that reliable water resources would be available to continuously meet demand through 2045.[79] In the 2020 RUWMP, the projected 2045 demand water is 1,564,000 afy, whereas the expected and projected 2045 supply is 2,239,000 afy based on current programs, for a potential surplus in 2045 of 675,000 afy.[80] Additionally, MWD has comprehensive plans for stages of actions it would undertake to address up to a 50-percent reduction in its water supplies and a catastrophic interruption in water supplies through its Water Surplus and Drought Management and Water Supply Allocation Plans.

Water Demand

As shown in Table 16, Proposed Project Estimated Water Generation, below, the Proposed Project would generate a net demand for approximately 9,286 gpd. Based on the estimates provided, implementation of the Proposed Project is not expected to measurably increase the demand for water for the GSWC's Central District. Of the total available capacity for CRA and nine reservoirs of MWD, the Proposed Project would account a negligible percent, and no new or expanded water treatment facilities would be required during normal, dry or multiple dry years. With respect to water treatment facilities, the Proposed Project would have a less than significant impact.

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75 The Golden State Water Company (GSWC) provided a Will Serve Letter for the Proposed Project. See (see Appendix E, Consultation Letters.

76 The Metropolitan Water District of Southern California, Fact Sheets, MWD at a Glance. http://www.mwdh2o.com/WhoWeAre/Mission/Pages/default.aspx, accessed June 2021.

77 Metropolitan Water District of Southern California, 2020 Regional Urban Water Management Plan, June 2021, https://www.mwdh2o.com/media/21641/2020-urban-water-management-plan-june-2021.pdf. Accessed November 2021.

78 Ibid.

79 Ibid.

80 Ibid.

Table 16
Proposed Project Estimated Water Demand

Type of Use	Size	Water Demand Rate (gpd/unit) [a,b]	Total Water Demand (gpd)
Existing Conditions			
Commercial	4,182 sf	60 gpd/1,000 sf	251
		Existing Water Generation:	**251**
Proposed Project			
Residential	51 du	187 gpd/du	9,537
		Project Water Generation:	**9,537**
		Less Existing	*-251*
		Net Project Water Generation:	**9,286**

Notes: sf =square feet; du = dwelling units, gpd = gallons per day
a The estimated water demand was based on 120% of the sewerage generation factors for land use categories.
b Los Angeles County Sanitation Districts, Table 1, Loadings For Each Class of Land Use, website: https://www.lacsd.org/civicax/filebank/blobdload.aspx?blobid=3531, accessed June 2021. See also Appendix E, Consultation Letters of this IS/MND.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? ☐ ☒ ☐ ☐

Existing Infrastructure

The County's Sanitary Sewer Network covers approximately 824 square miles and encompasses 78 cities and unincorporated territory within the County. There are approximately 9,500 miles of tributary sewers that are owned and operated by the cities and County. The tributary sewers discharged in the Los Angeles County Sanitation Districts, City of Los Angeles, and Las Virgenes Municipal Water Districts (Districts) collection system for treatment.[81] The Project Site is located within the jurisdictional boundary of District No.1. The Project Site and surrounding area is serviced by lateral and main sewer lines. Wastewater generated on the Project Site is conveyed by an existing 8-inch sewer line that runs north of the Project Site along 126th Street with a flow direction of east. Wastewater is then conveyed to the Districts' Holmes-Willowbrook 17-inch Trunk Sewer line that runs along Willowbrook Avenue, immediately east of the Project Site, which flows south.[82,83] The Districts' Holmes-Willowbrook Trunk Sewer has a capacity of 2.9 mgd and conveyed a peak flow of 0.3 mgd (when last measured in 2019).[84]

81 Los Angeles County, Department of Public Works, Water Resources: Sewers. Website: https://dpw.lacounty.gov/landing/wr/sewer.cfm, accessed June 2021.
82 Ibid.
83 Los Angeles County Sanitation Districts, Will Serve Letter for Willowbrook III, dated June 24, 2021. See Appendix E, Consultation Letters of this IS/MND.
84 Ibid.

Wastewater Treatment

Ultimately sewage from the Project Site is conveyed via County sewer infrastructure to the JWPCP. The JWPCP treats an average daily flow of 259 mgd and has the capacity to treat 400 mgd. This equals a remaining capacity of 141 mgd of wastewater able to be treated at the JWPCP.[85,86]

Wastewater Generation

A project would normally have a significant wastewater impact if a project would cause a measurable increase in wastewater flows to a point where sewer capacity is constrained, or sewer capacity may become constrained; or the Project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant. As shown in Table 17, Proposed Project Estimated Wastewater Generation, below, the Proposed Project would generate approximately 7,747 gpd of wastewater. The Project is expected to constitute a negligible amount of wastewater treated at the JWPCP. Of the remaining capacity to treat 141 additional mgd, the Proposed Project represents a fraction of one percent of the available capacity.

Table 17
Proposed Project Estimated Wastewater Generation

Type of Use	Size	Wastewater Generation Rate (gpd/unit) [a]	Total Wastewater Generation (gpd)
Existing Conditions			
Commercial	4,182 sf	50 gpd/1,000 sf	209
		Existing Wastewater Generation	**209**
Proposed Project			
Residential	51 du	156 gpd/du	7,956
		Project Wastewater Generation	7,956
		Less Existing	*-209*
		Net Project Wastewater Generation:	**7,747**

Notes: sf =square feet; du = dwelling units, gpd = gallons per day
a Los Angeles County Sanitation Districts, Table 1, Loadings for Each Class of Land Use, website: https://www.lacsd.org/civicax/filebank/blobdload.aspx?blobid=3531, accessed June 2021. See also Appendix E, Consultation Letters of this IS/MND.

The capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by SCAG. All expansions of Districts' facilities must be sized, and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities is therefore limited to levels associated with the approved growth identified by SCAG.[87] As discussed in Section 3. Air Quality, Section 11. Land Use and Planning, and Section 14. Population and Housing, the Proposed Project is consistent with the population and housing projections, and goals and policies, of SCAG's Connect SoCal and would therefore be consistent within the projected capacities of the District's wastewater treatment facilities. Additionally, the Districts are empowered by the California Health and Safety Code to charge a fee to connect facilities (directly or indirectly) to the Districts' Sewerage System or to increase the strength or

85 Los Angeles County Sanitation Districts, Will Serve Letter for Willowbrook III, dated June 24, 2021. See Appendix E, Consultation Letters of this IS/MND.
86 Los Angeles County Sanitation Districts, https://www.lacsd.org/facilities/?tab=2, accessed June 2021.
87 Los Angeles County Sanitation Districts, Will Serve Letter for Willowbrook III, dated June 24, 2021. See Appendix E, Consultation Letters of this IS/MND.

quantity of wastewater discharged from connected facilities. This connection fee is a capital facilities fee that is used by the Districts to upgrade or expand the Sewerage System.[88] Furthermore, implementation of mitigation measure UTIL-1, which requires the Applicant to submit a Sewer Study, would ensure impacts related to the existing system would be less than significant. Therefore, with payment of required connection fees and implementation of mitigation measure UTIL-1, impacts to sewer capacity and infrastructure would be less than significant.

Mitigation Measures:

UTIL-1 A Sewer Area Study analyzing the project impact on the existing sewerage system shall be submitted to the Department of Public Works for review and approval prior to the commencement of the construction activities. Should the sewer area study show adverse impacts to the existing system, pipe replacement/upsizing shall be necessary and the sole responsibility of the Applicant.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐

A significant impact may occur if a project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste.

Although the County provides solid waste management services to the Project Site and unincorporated areas, disposal destinations for solid waste would be at the discretion of the private haulers, who maintain disposal agreements with landfill operators. The County has numerous private haulers to collect residential, industrial and commercial waste that is ultimately disposed of at one of the County's 12 operating landfills. Solid waste generated on the Project Site is anticipated to be disposed of at one of the County's larger landfills, Sunshine Canyon. The Sunshine Canyon City/County Landfill in Sylmar is owned and operated by Republic Services, Inc. The Sunshine Canyon Landfill continues to operate for six days per week. The facility's maximum permitted daily capacity is 12,100 tons, with an annual capacity of approximately 3.8 million tons. Approximately 2.2 million tons of municipal solid waste had been disposed of for the year 2019 at the landfill. The average daily disposal tonnage is approximately 6,387 tons (based on 6 days). As of December 31, 2019, the Sunshine Canyon Landfill has an expected remaining lifespan of 18 years and an estimated remaining disposal capacity of 55.2 million tons of waste.[89] If the Sunshine Canyon Landfill were to become constrained, there are other solid waste disposal facilities that may serve the Project Site.

The Proposed Project would follow all applicable solid waste policies and objectives that are required by law, statute, and regulation. The Proposed Project's solid waste disposal needs would be directed to the local recycling facilities and landfills described above. As shown in Table 18, below, the Proposed Project's estimated construction and demolition debris would total approximately 432 tons. As shown in Table 19, below, the Proposed Project's operational solid waste generation is estimated to be 204 pounds per day. The amount of solid waste generated by the Proposed Project is within the available capacities at the area landfills. Therefore, impacts with respect to solid waste would be less than significant.

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88 Ibid.

89 County of Los Angeles Department of Public Works, CoIWMP 2019 Annual Report, September 2020, https://pw.lacounty.gov/epd/swims/ShowDoc.aspx?id=14372&hp=yes&type=PDF, accessed June 2021.

Table 18
Estimated Construction and Demolition Debris

Construction Activity	Size	Rate [a b]	Generated Waste (tons)
Demolition			
Commercial	4,182 sf	155 lbs/sf	324
Total Project Demolition Debris Generation:			**324**
Construction			
Multi-Family Residential	49,156 sf	4.39 lbs/sf	108
Total Project Construction Debris Generation:			**108**
Proposed Project TOTAL (Demolition and Construction):			**432**

Notes: sf = square feet; lbs = pounds
a USEPA Report No. EPA530-98-010, Characterization of Building Related Construction and Demolition Debris in the United States, July 1998.
b USEPA, Estimating 2003 Building-Related Construction and Demolition Materials Amounts, 2003.

Table 19
Expected Operational Solid Waste Generation

Type of Use	Size	Solid Waste Generation Rate [a] (lbs/unit/day)	Total Solid Waste Generated (lbs/day)
Proposed Project			
Multi-Family Residential	51 du	4 lbs/du/day	204
Total Project Solid Waste Generation:			**204**

Notes: du = dwelling units; lbs = pounds
a City of Los Angeles, CEQA Thresholds Guide, 2006, page M.3-2. Waste generation includes all materials discarded, whether they are later recycled or disposed of in a landfill.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? ☐ ☐ ☒ ☐

A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. The Proposed Project, like all other developments in the Los Angeles County, will be required to adhere to the County ordinances and policies related to trash removal, waste reduction, and recycling, such as, but not limited to: Zero Waste California, California Green Building Standards, Assembly Bill 341 (California's 75-Percent "Recycling" Goal, and the County's Countywide Integrated Waste Management Plan (2019). The Proposed Project would generate solid waste that is typical of a residential building and would comply with all federal, state, and local statutes and regulations regarding proper disposal. As a result, the Proposed Project's potential impacts are considered to be less than significant.

20. WILDFIRE

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒

The Project Site is located in an urbanized area within the community of Willowbrook and is not located within or near a State Responsibility Area or land classified as a Very High Fire Hazard Severity Zone (VHFHSZ).[90] As discussed in Section 17. Transportation (d), the Proposed Project would not involve the long-term closure of any public roadway. Temporary road closures may occur during construction and utility connections. Access to the Project Site would be provided via a full-access driveway on 126th Street. As discussed in Section 15. Public Services (a) Fire, design requirements would be specified during site plan review for certain components of the Proposed Project (driveway widths and turning radii) to facilitate the LACFD's access to the Project Site in the event of a fire or other emergencies. As such, the Proposed Project would be required to be designed in such a way as to provide adequate emergency access. Thus, the Proposed Project would not impede emergency access on-site or off-site. The Proposed Project would not result in inadequate emergency access to the Project Site or to nearby properties. Therefore, no impact would occur.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒

The Proposed Project includes the development of 51 affordable housing units. The Project Site is located in an urbanized area within the community of Willowbrook and is not located within or near a State Responsibility Area or land classified as a VHFHSZ.[91] The Project Site is relatively flat and surrounded by existing infill development and roadways. As such, development of the Proposed Project would not expose people or structures or exacerbate any existing potentially hazardous conditions associated with a significant risk of involving wildfires. Therefore, no impact would occur.

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90 Cal Fire, Los Angeles County FHSZ Map, website: https://osfm.fire.ca.gov/media/6705/fhszs_map19.pdf, accessed June 2021.
91 Ibid.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? ☐ ☐ ☐ ☒

The Project Site is located in an urbanized area within the community of Willowbrook and is not located within or near a State Responsibility Area or land classified as a VHFHSZ.[92] The Proposed Project is well served by existing infrastructure. The Project Site is surrounded by existing infill development and roadways. Although the development of the Proposed Project may require connection to existing utilities, any upgrades to facilitate connection would be minimal. As such, development of the Proposed Project would not or exacerbate any existing potentially hazardous conditions associated with a significant risk of involving wildfires and no impact would occur.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? ☐ ☐ ☐ ☒

As discussed in Section 7. Geology and Soils (iv) Landslides, according to the State of California Department of Conservation, the Project Site is not located within an area identified as having a potential for seismic slope instability. Additionally, as discussed in Section 10. Hydrology and Water Quality (iv) Landslides, the Proposed Project is not located within a designated 100-year flood hazard area, as defined by FEMA's Flood Insurance Mapping Program. Lastly, no surface water bodies or drainage channels are present on-site. The Project Site and surrounding area is generally flat and is serviced by existing stormwater drainage conveyance infrastructure. Therefore, the Proposed Project would not impede or direct flows. As such, no downstream flooding is likely to occur at the Project Site or in the surrounding area and no impact would occur.

e) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? ☐ ☐ ☐ ☒

The Proposed Project includes the development of 51 affordable housing units. The Project Site is located in an urbanized area within the community of Willowbrook and is not located within or near a State Responsibility Area or land classified as a VHFHSZ.[93] The Project Site is relatively flat and surrounded by existing infill development and roadways. As such, development of the Proposed Project would not expose people or structures or exacerbate any existing potentially hazardous conditions associated with a significant risk of involving wildfires and no impact would occur.

92 Ibid.
93 Ibid.

21. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐

A significant impact would occur only if the Proposed Project results in potentially significant impacts for any of the above issues. The Proposed Project is located in a developed urban area and would have no unmitigated significant impacts with respect to biological resources or California's history or pre-history. Therefore, the Proposed Project would not have the potential to degrade the quality of the environment, reduce or threaten any fish or wildlife species (endangered or otherwise), or eliminate important examples of the major periods of California history or pre-history. As discussed in Section 4. Biological Resources, the Proposed Project would not substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal. However, construction-related activities that occur during the breeding season of species protected by the MBTA or Fish and Game Code may result in take of active bird nests. Such activities may include removal of exiting vegetation and structures. Therefore, Mitigation Measure BIO-1 is recommended to reduce this potential impact to a less than significant level. As discussed in Section 5. Cultural Resources, development of the Proposed Project would not cause a substantial adverse change in the significance of a historical resource; however, because the presence or absence of archaeological and tribal resources, and paleontological materials, as well as human remains, cannot be determined until earthwork activities begin, the Proposed Project shall adhere to Mitigation Measure CUL-1, CUL-2 , TCR-1 and TCR-2. As such, the Proposed Project's impacts would be less than significant with incorporation of mitigation.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒	☐	☐

A significant impact may occur if the Proposed Project, in conjunction with other related projects in the area of the Project Site, would result in impacts that would be less than significant when viewed separately, but would be significant when viewed together. Related projects include past, current, or probable future projects whose development could contribute to potentially significant cumulative impacts in conjunction with a given

Project. As concluded in this analysis, the Proposed Project's incremental contribution to aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, energy, geology/soils, greenhouse gas emissions, hazards/hazardous materials, hydrology/water quality, land use/planning, mineral resources, noise, population/housing, public services, recreation, transportation, tribal resources, utilities and wildfire would be less than significant, or mitigated to a level below significance with the incorporation of mitigation measures when viewed in connection with the four related projects shown in Section C, Table 3, Related Projects List, of the Project Description.

Aesthetics Cumulative Impacts

Development of the Proposed Project in conjunction with the related projects would result in an incremental intensification of existing prevailing land uses in an already heavily urbanized area of the unincorporated area of the County. The related projects are located between 0.04 and 3.1 miles from the Proposed Project. The four related projects listed in Table 3, all consist of multi-family affordable housing developments that are similar in scale to the Proposed Project. As such, development of the related projects is expected to occur in accordance with adopted plans and regulations of the County and would not be expected to cumulatively alter the existing visual character of the vicinity to a significant level. Specifically, the Proposed Project would be designed to complement the surrounding neighborhood including the two- and three-story Mosaic Gardens Apartments (See related project No. 1, R2014-01658) to the south and other two- and three-story multi-family residential buildings within the project vicinity. The Proposed Project shall complement the building style of the surrounding area and be consistent with the zoning development and General Plan land use standards relative to building heights, street setbacks, parking spaces, and bicycle storage spaces. Moreover, the Proposed Project would incorporate project design feature PDF-1 and Mitigation Measures AES-1 and AES-2 to ensure development of the Proposed Project would result in less than significant impacts to aesthetics. Therefore, cumulative aesthetic impacts would be less than significant.

Agriculture / Forest Cumulative Impacts

Development of the Proposed Project in combination with the four related projects would not result in the conversion of State-designated agricultural land from agricultural use to a non-agricultural use, nor result in the loss of forest land or conversion of forest land to non-forest use. The Project Site and the surrounding area are not classified in any "Farmland" category designated by the State of California. The Project Site and the surrounding area are highly urbanized area and do not include any State-designated agricultural lands or forest uses. Therefore, no cumulative agriculture /forest impacts would occur.

Air Quality Cumulative Impacts

Development of the Proposed Project in conjunction with the related projects would result in an increase in construction and operational emissions in the already urbanized area of the County of Los Angeles. As noted in Section 3. Air Quality, above, the Proposed Project would not have a cumulatively considerable contribution to an impact regarding a potential conflict with or obstruction of the implementation of the applicable air quality plan. Thus, cumulative impacts related to conformance with the 2016 AQMP would be less than significant. With respect to cumulative air quality impacts from construction and operation of the Proposed Project, the SCAQMD's thresholds of significance for cumulative impacts is based on the same significance criteria as those for project specific impacts presented in the analysis above. Thus, individual development projects that generate construction or operational emissions that do not exceed the SCAQMD recommended daily thresholds for project-specific impacts would also not cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment. Thus, as discussed in Section 3. Air Quality (c) above, the Proposed Project would not exceed the SCAQMD's recommended

thresholds. Therefore, construction and operational emissions associated with the Proposed Project would not be cumulatively considerable and cumulative air quality impacts would be less than significant.

Biological Resources Cumulative Impacts

Development of the Proposed Project in combination with the identified related projects would result in no significant cumulative impacts upon biological resources. No wildlife corridors or habitat for any candidate, sensitive, or special status species identified in local plans, policies, or regulations, or by the CDFW or the USFWS occur in the vicinity of the Project Site or related projects due to the existing urban development. Furthermore, the Proposed Project would have a less than significant impact on biological resources with adherence to Mitigation Measure BIO-1. Therefore, no cumulative biological resources impacts would occur.

Cultural Resources Cumulative Impacts

Implementation of the Proposed Project, in combination with the other related projects in the Project Site vicinity, would result in the redevelopment and revitalization of the surrounding area. Impacts to cultural resources tend to be site-specific and are assessed on a site-by-site basis. As discussed in Section 5. Cultural Resources, development of the Proposed Project would not cause a substantial adverse change in the significance of a historical resource; however, because the presence or absence of archaeological, and paleontological materials, as well as human remains, cannot be determined until earthwork activities begin, the Proposed Project shall adhere to Mitigation Measure CUL-1, CUL-2, TCR-1 and TCR-2. Therefore, cumulative cultural resources impacts would be less than significant.

Energy Cumulative Impacts

Development of the Proposed Project in combination with the four related projects would not result in significant adverse impacts upon energy. The Proposed Project and the related projects in the County would be expected to comply with the Los Angeles County Green Building Standards Code which addresses green buildings, low-impact development, and landscape design.[94] The related projects in the City of Compton would be expected to be designed in accordance with adopted plans and regulations of the City of Compton regarding energy. Additionally, Section 6. Energy, concluded the Proposed Project would have less than significant impacts on energy. Therefore, cumulative energy impacts would be less than significant.

Geology and Soils Cumulative Impacts

Geotechnical hazards are site-specific and there is little, if any, cumulative geological relationship between the Proposed Project and any related projects. Similar to the Proposed Project, potential impacts related to geology and soils would be assessed on a case-by-case basis and, if necessary, the Applicants of the related projects would be required to implement the appropriate project design features and mitigation measures. Furthermore, the analysis of the Proposed Project's geology and soils impacts in Section 7. Geology and Soils, concluded that the Proposed Project would be constructed in conformance with the Los Angeles County Building Code. Due to seismic compliance standards, the construction contractor shall incorporate best management practices consistent with the guidelines provided in the *California Storm Water Best Management Practice Handbooks: Construction* as well as project design elements consistent with Office of Statewide Health Planning and Development, California Building Code, Uniform Building Code, or other required standards

[94] County of Los Angeles, Los Angeles County Green Building Standards Code, website: https://library.municode.com/HTML/16274/level2/TIT31GRBUSTCO_CH1AD.html, accessed June 2021.

to further reduce any potential for impacts resulting from strong seismic ground shaking. Therefore, cumulative geology and soils impacts would be less than significant.

Greenhouse Gas Emissions Cumulative Impacts

The GHG emissions from a 51-unit residential project are relatively very small in comparison to state or global GHG emissions and, consequently, they would, in isolation, have no significant direct impact on climate change. Rather, it is the increased accumulation of GHG from more than one project and many sources in the atmosphere that may result in global climate change, which can cause the adverse environmental effects previously discussed. Accordingly, the threshold of significance for GHG emissions determines whether a project's contribution to global climate change is "cumulatively considerable." Many regulatory agencies, including the SCAQMD, concur that GHG and climate change should be evaluated as a potentially significant cumulative impact, rather than a project direct impact. Accordingly, the GHG analysis presented above in Section 8. Greenhouse Gas Emissions analyzes whether the Proposed Project's impact would be cumulatively considerable using a plan-based approach (and quantitative and qualitative analysis) to determine the Proposed Project's contributing effect on global warming. As concluded above, the Proposed Project's generation of GHG emissions would not make a cumulatively considerable contribution to GHG emissions and impacts would be less than significant.

Hazards and Hazardous Materials Cumulative Impacts

Development of the Proposed Project in combination with the related projects has the potential to increase to some degree the risks associated with the use and potential accidental release of hazardous materials in the vicinity of the Proposed Project and the related projects. However, the potential impact associated with the Proposed Project, as discussed in Section 9. Hazards and Hazardous Materials, would be less than significant and, therefore, not cumulatively considerable. With respect to the related projects, the potential presence of hazardous substances would require evaluation on a case-by-case basis, in conjunction with the past uses on the properties and the development proposals for each of those properties. Further, local municipalities are required to follow local, state, and federal laws regarding hazardous materials, which would further reduce impacts associated with the related projects. Adherence to these laws regarding hazardous materials are expected to reduce any impacts related to hazards and hazardous materials to a less than significant level. Therefore, cumulative hazards and hazardous materials impacts would be less than significant.

Hydrology and Water Quality Cumulative Impacts

Development of the Proposed Project in combination with the related projects has the potential to result in impacts to hydrology and water quality. The Proposed Project would comply with LID implementation features and requirements and regulations of the NPDES and LID Ordinance. The Proposed Project would also implement BMPs identified in the SWPPP. The analysis of the Proposed Project's hydrology and water quality impacts in Section 10. Hydrology and Water Quality, concluded that, through the implementation of the regulatory requirements, impacts would be reduced to less than significant levels. The related projects in the County's jurisdiction are required to provide on-site BMPs and storm drainage systems and/or upgrades to prevent the creation of flood hazards on each project site and to downstream areas. Therefore, cumulative hydrology and water quality impacts would be less than significant.

Land Use and Planning Cumulative Impacts

As discussed in Section 11. Land Use and Planning, the Applicant is requesting a General Plan Amendment and a Zone Change for the Proposed Project. Implementation of regulatory code and approval of the General Plan Amendment and Zone Change would ensure the Proposed Project is consistent with the General Plan

and Zoning Code and reduce the Proposed Project's impacts related to land use to less than significant levels. Similar to the Proposed Project, potential impacts related to land use would be assessed on a case-by-case basis and, if necessary, the Applicants of the related projects would be required to implement the appropriate mitigation measures and request a General Plan Amendment or Zone Change. Therefore, cumulative land use and planning impacts would be less than significant.

Mineral Resources Cumulative Impacts

As discussed in Section 12. Mineral Resources, the Proposed Project would have no impact on mineral resources. The Project Site is not designated as a mineral resource area by the County. The Proposed Project would have no incremental contribution to the potential cumulative impact on mineral resources. Therefore, cumulative mineral resources impacts would be less than significant.

Noise Cumulative Impacts

Construction

If construction of the Proposed Project were to coincide with construction of the related projects, it would not be expected to result in significant increases in noise levels at sensitive receptors identified in Section 13. Noise, beyond the Proposed Project considered in isolation. The related projects are located between 0.04 and 3.1 miles from the Proposed Project. Noise from stationary or point sources is reduced by about 6 to 7.5 dBA for every doubling of distance at acoustically hard and soft locations, respectively. In addition, noise levels are also generally reduced by 1 dBA for each 1,000 feet of distance due to air absorption. Noise levels may also be reduced by intervening structures – generally, a single row of buildings between the receptor and the noise source reduces the noise level by about 5 dBA, while a solid wall or berm reduces noise levels by 5 to 10 dBA. It is widely accepted that in the community noise environment the average healthy ear can barely perceive CNEL noise level changes of 3 dBA. CNEL changes from 3 to 5 dBA may be noticed by some individuals who are extremely sensitive to changes in noise. A 5 dBA CNEL increase is readily noticeable, while the human ear perceives a 10 dBA CNEL increase as a doubling of sound. Therefore, if construction of the Proposed Project were to occur simultaneously with construction of the related projects, the added construction noise levels would not increase noise levels by 3 to 5 dBA to be perceptible by the human ear due to distance. As discussed in Section 13. Noise, construction of the Proposed Project would require Mitigation Measures NOISE-1 through NOISE-4 to reduce impacts to a less than significant level. The related projects would also be subject to the County's adopted plans and regulations regarding construction noise and incorporate applicable mitigation measures, respectively. Therefore, cumulative construction noise impacts would be less than significant.

If construction of the Proposed Project were to coincide with construction of the related projects, it would not result in significant increases in groundborne vibration at sensitive receptors. The background vibration velocity level in residential areas is usually around 50 VdB. The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for most people. If construction of the Proposed Project were to occur simultaneously with construction of the related projects, the added groundborne vibration would not increase vibration levels due to distance of the related projects to the Project Site. As discussed in Section 13. Noise, implementation of mitigation measure NOISE-3 above would reduce impacts related to ground-borne vibration to a less than significant level. The related projects would also be subject to the County's adopted plans and regulations regarding groundborne vibration and incorporate applicable mitigation measures, respectively. Therefore, cumulative groundborne vibration impacts would be less than significant.

Operation

Operation of the Proposed Project in combination with the related projects would not have the potential to result in significant cumulative impacts related to operational noise. As discussed in Section 13. Noise, the HVAC equipment noise generated by the Proposed Project would not increase levels at the sensitive receptors identified in excess of standards established by the County General Plan or noise ordinance based on the reference level for HVAC equipment and the existing ambient noise levels shown in Table 8. Due to distance, similar operational noise levels, and existing ambient noise levels, if operation of the Proposed Project were to occur simultaneously with operation of the related projects, the added noise levels would not increase noise levels at the sensitive receptors in excess of standards established by the County General Plan or noise ordinance. Furthermore, the related projects would also be subject to the County's adopted plans and regulations, respectively.

As discussed in Section 13. Noise, the Proposed Project would not result in a significant permanent increase in ambient noise levels. In order for a new noise source to be audible, there would need to be a 3 dBA or greater noise increase to the ambient noise level. The traffic noise from the Proposed Project when considered cumulatively with traffic noise from the related projects would not result in a substantial permanent increase in ambient noise levels. Therefore, cumulative operational noise impacts would be less than significant.

Population and Housing Cumulative Impacts

The related projects would introduce additional residential related uses and would result in direct population growth in the County and the City of Compton. As shown in Table 20, the Proposed Project and related projects that involve residential developments would cumulatively contribute 358 new residential dwelling units within the Project area, generating approximately 255 new residents for the City of Compton and 819 new residents for the unincorporated areas in Los Angeles County, which accounts for 8.2% of the available capacity for estimated growth in the City of Compton area and 0.38% in Unincorporated areas between 2016 and 2045.

As discussed in the response to Question 14 a), the Proposed Project would not exceed the growth projections of SCAG's RCP for the City of Compton and unincorporated areas of Los Angeles County subregions. The Proposed Project's population growth would not be cumulatively considerable. Therefore, the Proposed Project's cumulative impacts to population and housing would be less than significant.

Table 20
Projected Cumulative Housing Units

Related Projects (By Housing Type)	Total Housing Units	Total Residents
Multi-family Residences	307	921
Related Projects Total:	307 du	921
Proposed Project Total:	51 du	153
CUMULATIVE TOTAL:	**358 du**	**1,074**
Notes: du = dwelling units		

Public Services Cumulative Impacts

Fire Protection

The Proposed Project, in combination with the four related projects, could increase the demand for fire protection services in the Project area. Specifically, there could be increased demands for additional LACFD staffing, equipment, calls for service, and facilities over time. This need would be funded via existing mechanisms (e.g., property taxes, government funding, and developer fees) to which the Proposed Project and related projects would contribute. Similar to the Proposed Project, each of the related projects would be individually subject to the City of Compton Fire Department or the LACFD review and would be required to comply with all applicable fire safety requirements of the respective jurisdiction in order to adequately mitigate fire protection impacts. Specifically, any related project that exceeded the applicable response distance standards described above would be required to install automatic fire sprinkler systems in order to mitigate the additional response distance. To the extent cumulative development causes the need for additional fire stations to be built throughout the County, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the siting and development of any new fire stations would be subject to further CEQA review and evaluated on a case-by-case basis. On this basis, the Proposed Project would not make a cumulatively considerable impact to fire protection services, and, as such cumulative impacts on fire protection would be less than significant.

Sheriff Protection

The Proposed Project, in combination with the four related projects, would increase the demand for police protection services in the Project area. Specifically, there would be an increased demand for additional LACSD staffing, equipment, calls for service, and facilities over time. This need would be funded via existing mechanisms (e.g., sales taxes, government funding, and developer fees), to which the Proposed Project and related projects would contribute. In addition, each of the related projects would be individually subject to LACSD review and would be required to comply with all applicable safety requirements of LACSD in order to adequately address police protection service demands. Furthermore, each of the related projects would likely install and/or incorporate adequate crime prevention design features in consultation with LACSD, as necessary, to further decrease the demand for police protection services. To the extent cumulative development causes the need for additional police stations to be built throughout the unincorporated areas of the County, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the siting and development of any new police stations would be subject to further CEQA review and evaluated on a case-by-case basis. On this basis, the Proposed Project and its related projects would not make a cumulatively considerable impact to police protection services, and cumulative impacts on police protection would be less than significant.

Schools

The Proposed Project, in combination with the four related projects is expected to result in a cumulative increase in the demand for school services. Development of the related projects would likely generate additional demands upon school services. These related projects would have the potential to generate students that would attend the same schools as the Proposed Project. As shown in Table 21, Projected Cumulative Student Generation, the Proposed Project and related projects would cumulatively contribute approximately 82 elementary school students, 22 middle school students and 47 high school students, generating a net total of 151 students. This would create an increased cumulative demand on local school districts. However, each

of the new housing units would be responsible for paying mandatory school fees to mitigate the increased demand for school services. Therefore, cumulative impacts on schools would be less than significant.

Table 21
Projected Cumulative Student Generation

Land Use	Size	Elementary School Students	Middle School Students	High School Students	SDC Students	Total Students
Multi-Family Residences	307 du	70	19	40	6	135
Related Projects Total:		**70**	**19**	**40**	**6**	**135**
Proposed Project Total:		12	3	7	1	23
Cumulative Total:		**82**	**22**	**47**	**7**	**158**

Notes: du = dwelling units; SDC = special daily class
Student generation rates are as follows for multi-family residential uses: 0.2269 elementary, 0.0611 middle, 0.1296 high school, and 0.0194 SDC students per dwelling unit.
Source: 2020 Developer Fee Justification Study, Los Angeles School District, https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/921/LAUSD%20Dev%20Fee%20Study%202020_Final.pdf. Accessed November 2021.

Parks

Development of the Proposed Project in conjunction with the related projects could result in an increase in permanent residents residing in the greater Project area. Additional cumulative development would contribute to lowering the County's existing parkland to population ratio, which is currently below the preferred standard. Additionally, related projects that include subdivisions would be subject to comply with payment of the Quimby Fees. Therefore, with compliance with applicable provisions, the Proposed Project would not make a cumulatively considerable impact to parks and recreational facilities, and cumulative impacts would be less than significant.

Libraries and Other Public Facilities

The Proposed Project in conjunction with the related projects could result in an increase in permanent residents residing in the greater Project area. Demands for public services such as libraries and other public facilities are generally funded via existing mechanisms (e.g., property taxes, government taxes, and developer fees) to which the Proposed Project and the related projects would contribute. To the extent cumulative development causes the need for additional public service facilities to be built throughout the unincorporated area of the County, the development of such facilities would likely occur on small infill lots within existing developed areas as the County is completely built out. Such development, if warranted, would not likely cause a significant impact upon the environment. Nevertheless, the siting and development of any new public facilities would be subject to further CEQA review and evaluated on a case-by-case basis. Moreover, as discussed in Section 15. Public Services, the Proposed Project would result in less than significant impacts to libraries and other public facilities. On this basis, the Proposed Project would not make a cumulatively considerable contribution to libraries and other public facilities, and the Proposed Project's cumulative impacts would be considered less than significant.

Recreation Cumulative Impacts

As discussed in Section 16. Recreation, the Proposed Project would have less than significant impacts on recreational resources. However, as discussed above, development of the Proposed Project in conjunction with the related projects could result in an increase in permanent residents residing in the greater Project area.

Each of the related projects would be subject to the provisions of the adopted plans and regulations regarding recreation by the City of Compton and the County, respectively. Related projects that involve subdivisions would also be subject to comply with payment of the Quimby Fees. Therefore, cumulative recreation impacts would be less than significant.

Transportation Cumulative Impacts

As discussed in Section 17. Transportation, the Proposed Project would not be expected to interfere with the County General Plan Mobility Element or the LACDPW Bicycle Master Plan.[95,96] Additionally, although the Proposed Project would increase development on the Project Site, as compared to existing conditions, the Proposed Project would further the State's affordable housing goals and is consistent with the County's VMT screening exemption criteria pursuant to the County's Transportation Impact Analysis Guidelines. Therefore, impacts would be less than significant. To the extent that development of the four related projects occurs, each project would be evaluated on a case-by case basis for consistency with regional and local transportation polices and guidelines, including an analysis of VMTs. Each related project would require site plan review by the County's Planning Department, as well as LACFD, for specific development standards and emergency access requirements, respectively. Therefore, cumulative impacts related to transportation would be less than significant.

Tribal Cultural Resources Cumulative Impacts

Implementation of the Proposed Project, in combination with the other related projects in the Project Site vicinity, would result in the redevelopment and revitalization of the surrounding area. Like cultural resource, impacts to tribal cultural resources tend to be site-specific and are assessed on a site-by-site basis. As discussed in Section 18. Tribal Cultural Resources, development of the Proposed Project would not cause a substantial adverse change in the significance of a historical resource; however, because the presence or absence of TCRs, cannot be determined until earthwork activities begin, the Proposed Project shall adhere to Mitigation Measure CUL-1, TCR-1 and TCR-2. Therefore, cumulative tribal cultural resources impacts would be less than significant.

Utilities and Service Systems Cumulative Impacts

Water

Implementation of the Proposed Project in conjunction with other projects and future projects within the Los Angeles County would further increase regional demands on water availability. The impact of the continued growth of the region would likely have the effect of diminishing the daily excess capacity of the existing reservoirs serving the Project Site area. As shown in Table 22, the Proposed Project and related projects would require approximately 66,695 gpd of water demand, which represents well under one percent of the current remaining capacity of The Colorado River Aqueduct and nine local reservoirs. Since there is currently adequate capacity to accommodate the cumulative water demand of the Proposed Project and its related projects, the Proposed Project's water demands are less than cumulatively considerable. Cumulative impacts with respect to water demand would be less than significant.

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95 County of Los Angeles Department of Regional Planning, 2015, Los Angeles County General Plan, Chapter 7: Mobility Element, website: http://planning.lacounty.gov/generalplan/existing, accessed June 2021.

96 County of Los Angeles, Department of Public Works, 2012 Bicycle Master Plan, website: https://pw.lacounty.gov/tpp/bike/masterplan.cfm, accessed June 2021.

Wastewater

Implementation of the Proposed Project in conjunction with other projects and future projects within the Los Angeles County would further increase regional demands on wastewater treatment capacity. The impact of the continued growth of the region would likely have the effect of diminishing the daily excess capacity of the existing reservoirs serving the Project Site area. As shown in Table 23 the Proposed Project and related projects would generate approximately 55,639 gpd of wastewater, which represents well under one percent of the current remaining capacity of JWPCP. Since there is currently adequate capacity to accommodate the cumulative wastewater generation of the Proposed Project and its related projects, the Proposed Project's wastewater generation is less than cumulatively considerable. Cumulative impacts with respect to wastewater generation would be less than significant.

Table 22
Projected Cumulative Water Demand

Type of Use	Size	Water Demand Rate (gpd/unit) [a]	Total Water Demand (gpd)
Related Projects			
Residential			
Multi-Family Apartment	307 du	187 gpd/du	57,409
		Related Projects Total:	**57,409**
		Proposed Project Total:	9,286
		Cumulative Total:	**66,695**

Notes: sf =square feet; du = dwelling units, gpd: gallons per day
a Los Angeles County Sanitation Districts, Table 1, Loadings for Each Class of Land Use, website: https://www.lacsd.org/civicax/filebank/blobdload.aspx?blobid=3531, accessed June 2021. See also Appendix E, Consultation Letters of this IS/MND.

Table 23
Projected Cumulative Wastewater Generation

Type of Use	Size	Wastewater Generation Rate (gpd/unit) [a]	Total Wastewater Generation (gpd)
Related Projects			
Residential			
Multi-Family Apartment	307 du	156 gpd/du	47,892
		Related Projects Total:	**47,892**
		Proposed Project Total:	7,747
		Cumulative Total:	**55,639**

Notes: sf =square feet; du = dwelling units, gpd: gallons per day
a Los Angeles County Sanitation Districts, Table 1, Loadings for Each Class of Land Use, website: https://www.lacsd.org/civicax/filebank/blobdload.aspx?blobid=3531, accessed June 2021. See also Appendix E, Consultation Letters of this IS/MND.

Electricity

With respect to electricity, the provision of Southern California Edison, the energy utility company servicing the Project area, is regional in nature. As discussed previously, Southern California Edison has prepared forecasts of regional demand for these utilities and their ability to meet future demand. These are incorporated into Southern California Edison's plans and strategies for meeting future needs. These plans are updated periodically to identify emerging shortfalls in service capacity not previously anticipated and develop strategies to accommodate any shortfalls. The plans address expected growth, which anticipates projected development within the service areas. As discussed in Section 18. Utilities and Service Systems, and Section 3. Air Quality, electricity utilized by the Proposed Project would not result in significant impacts to energy utility capacity. The related projects in the City of Compton would be expected to occur in accordance with adopted plans and regulations of the City of Compton regarding energy. Furthermore, the Proposed Project is not expected to result in cumulatively considerable contributions to cumulatively significant impacts on electricity. Therefore, cumulative electricity impacts would be less than significant.

Natural Gas

With respect to natural gas, the provision of the Southern California Gas Company, the natural gas company servicing the Project area, is regional in nature. As discussed previously, the Southern California Gas Company has prepared forecasts of regional demand for these utilities and their ability to meet future demand. These are incorporated into Southern California Gas Company's plans and strategies for meeting future needs. These plans are updated periodically to identify emerging shortfalls in service capacity not previously anticipated and develop strategies to accommodate any shortfalls. The plans address expected growth, which anticipates projected development within the service areas. As discussed in Section 18. Utilities and Service Systems, and Section 3. Air Quality, natural gas utilized by the Proposed Project would not result in significant impacts to energy utility capacity. Furthermore, the Proposed Project is not expected to result in cumulatively considerable contributions to cumulatively significant impacts on natural gas consumption. The related projects in the City of Compton would be expected to occur in accordance with adopted plans and regulations of the City of Compton regarding energy. Therefore, cumulative natural gas impacts would be less than significant.

Solid Waste

Implementation of the Proposed Project in conjunction with other projects and future projects within the Los Angeles County would further increase regional demands on landfill capacity. The impact of the continued growth of the region would likely have the effect of diminishing the daily excess capacity of the existing landfills serving the Project Site area. As shown in Table 24, the Proposed Project and related projects would contribute approximately 1,432 pounds per day or 261 tons per year of solid waste, which represents well under one percent of the current remaining capacity of the Sunshine Canyon Landfill, which has the remaining capacity of approximately 3.8 million tons. As with the Proposed Project, other projects would participate in regional source reduction and recycling programs, significantly reducing the number of tons deposited in area landfills. Since there is currently adequate capacity to accommodate the cumulative disposal needs of the Proposed Project, the Proposed Project's solid waste generation is less than cumulatively considerable. Cumulative impacts with respect to solid waste would be less than significant.

Table 24
Projected Cumulative Operational Solid Waste Generation

Type of Use	Size	Solid Waste Generation Rate [a] (lbs/unit/day)	Total Solid Waste Generated (lbs/day)
Related Projects			
Multi-Family Residential	307 du	4 lbs/du/day	1,228
		Related Projects Total:	**1,228**
		Proposed Project Total:	204
		Cumulative Total:	**1,432**

Notes: sf =square feet; du = dwelling units
a City of Los Angeles, CEQA Thresholds Guide, 2006, page M.3-2. Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.

Wildfire

As discussed in Section 20. Wildfire, the Project Site and surrounding area is not located within or near a state responsibility area or land classified as a VHFHSZ.[97] The Project Site and surrounding area is relatively flat and is largely developed with existing infill development and roadways. As such, development of the Proposed Project and four related projects would not expose people or structures or exacerbate any existing potentially hazardous conditions associated with a significant risk of involving wildfires. Additionally, as discussed in Section 15. Public Services (a) Fire, design requirements would be specified during site plan review for the Proposed Project (driveway widths and turning radii), and related projects on a case by case basis, to facilitate the LACFD's access to a site in the event of a fire or other emergencies. Therefore, no cumulative impacts would occur.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? ☐ ☒ ☐ ☐

A significant impact may occur if the Proposed Project has the potential to result in significant impacts, as discussed in the preceding sections. Based on the preceding environmental analysis, the Proposed Project would not have significant environmental effects on human beings, either directly or indirectly. Any potentially significant impacts would be reduced to less-than-significant levels through the implementation of the applicable mitigation measures identified in this Draft IS/MND. Therefore, impacts would be less than significant with mitigation measures identified in this Draft IS/MND incorporated.

97 Cal Fire, Los Angeles County FHSZ Map, website: https://osfm.fire.ca.gov/media/6705/fhszs_map19.pdf, accessed June 2021.

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References

California Air Resources Board, The 2017 Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target, November 2017.

California Air Resources Board, Ambient Air Quality Standards, May 4, 2016, http://www.arb.ca.gov/research/aaqs/aaqs2.pdf, accessed June 2021.

Department of Conservation, Farmland Mapping and Monitoring Program, website: http://www.conservation.ca.gov/dlrp/FMMP/Pages/Index.aspx, accessed June 2021.

California Department of Conservation, California Earthquake Hazards Zone Application, website: https://maps.conservation.ca.gov/cgs/EQZApp/app/, accessed June 2021.

California Department of Transportation, Division of Environmental Analysis, Technical Noise Supplement, November 2009.

California Department of Transportation, Transportation and Construction Vibration Guidance Manual, Chapter 7: Vibration Prediction and Screening Assessment for Construction Equipment, Table 19. September 2013.

Cal Fire, Los Angeles County FHSZ Map, website: https://www.arbosfm.fire.ca.gov/cc/scopingplan/scoping_plan_2017media/6705/fhszs_map19.pdf, accessed June 2021.

California Government Code, Section 65996-65998, website: https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV&sectionNum=65995, accessed June 2021.

California Stormwater Quality Association, California Stormwater Best Management Practice Handbooks: Construction, website: https://www.casqa.org/resources/bmp-handbooks, accessed June 2021.

City of Los Angeles, CEQA Thresholds Guide, 2006.

Compton Unified School District, Facilities Department, website: https://www.compton.k12.ca.us/departments/business-services/facilities/home, accessed June 2021.

Compton Unified School District, School Locator, website: https://locator.decisioninsite.com/?StudyID=216387, accessed June 2021.

County of Los Angeles, Department of Parks and Recreation, Trails, website: http://trails.lacounty.gov, accessed June 2021.

County of Los Angeles, Department of Parks and Recreation, Parks Locator, website: https://parks.lacounty.gov/park-search-2/; accessed June 2021.

County of Los Angeles Department of Public Works, CoIWMP 2019 Annual Report, September 2020, https://pw.lacounty.gov/epd/swims/ShowDoc.aspx?id=14372&hp=yes&type=PDF, accessed June 2021.

County of Los Angeles, Department of Public Works, 2012 Bicycle Master Plan, website: https://pw.lacounty.gov/tpp/bike/masterplan.cfm, accessed June 2021.

Los Angeles County, Department of Public Works, LA County Sewer Map, website: https://dpw.lacounty.gov/smd/sewernetwork/, accessed June 2021.

County of Los Angeles, Department of Public Works, Transportation Impact Analysis Guidelines, July 23, 2020, website: https://pw.lacounty.gov/traffic/trafficreportmsg.cfm, accessed June 2021.

County of Los Angeles, Department of Regional Planning, 1980, County of Los Angeles General Plan, Noise Element, website: http://planning.lacounty.gov/assets/upl/project/gp_web80-noise-element.pdf, accessed June 2021.

County of Los Angeles, Department of Regional Planning, 2015, Los Angeles County General Plan 2035, website: https://planning.lacounty.gov/generalplan/generalplan, accessed June 2021.

County of Los Angeles, Department of Regional Planning, GIS-NET public, website: https://rpgis.isd.lacounty.gov/Html5Viewer/index.html?viewer=GISNET_Public.GIS-NET_Public, accessed June 2021.

County of Los Angeles, Los Angeles County Green Building Standards Code, website: https://library.municode.com/HTML/16274/level2/TIT31GRBUSTCO_CH1AD.html, accessed June 2021.

County of Los Angeles, Low Impact Development Standards, website: https://library.municode.com/index.aspx?clientId=16274, accessed June 2021.

County of Los Angeles, Municipal Code, website: https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances, accessed June 2021.

County of Los Angeles, Title 22 (Planning and Zoning), website: https://library.municode.com/index.aspx?clientId=16274, accessed June 2021.

County of Los Angeles, Title 22 (Planning and Zoning), Section 22.352, Willowbrook Community Standards District, website: https://library.municode.com/ca/los_angeles_county/codes/, accessed June 2021.

County of Los Angeles, Public Library, Willowbrook Library, website: https://lacountylibrary.org/willowbrook-library/, accessed June 2021.

County of Los Angeles, Public Library, Compton Library, website: https://lacountylibrary.org/compton-library/, accessed June 2021.

D33 Design and Planning, Inc., Plan Set, August 2020

Federal Emergency Management Agency, FEMA Flood Map Center, website: https://msc.fema.gov/portal/home, accessed June 2021.

Federal Transit Administration, Office of Planning and Environment, Transit Noise and Vibration Impact Assessment, May 2006.

Golden State Water Company, Central District, Will Serve Letter, June 2021.

Google, Google Earth Pro, June 2021.

Los Angeles County Fire Department, website: https://locator.lacounty.gov/fire, accessed June 2021.

Los Angeles Unified School District, 2020 Developer Fee Justification Study, website: https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/921/LAUSD%20Dev%20Fee%20Study%202020_Final.pdf, accessed November 2021.

Metropolitan Water District of Southern California, Fact Sheets, MWD at a Glance. http://www.mwdh2o.com/WhoWeAre/Mission/Pages/default.aspx, accessed June 2021.

Metropolitan Water District of Southern California, 2020 Regional Urban Water Management Plan, June 2021, https://www.mwdh2o.com/media/21641/2020-urban-water-management-plan-june-2021.pdf. Accessed November 2021.

Office of Historic Preservation, California State Parks, California Historical Resources, website: http://ohp.parks.ca.gov/ListedResources/?view=county&criteria=19, accessed June 2021.

Sanitation Districts of Los Angeles County, https://www.lacsd.org/facilities/?tab=2, accessed June 2021.

Sanitation Districts of Los Angeles County, Will Serve Letter, June 2021.

Southern California Association of Governments, Connect SoCal,: The 2020-2045 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS), Sustainable Communities Strategy (SCS), September 3, 2020, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176. Accessed June 2021.

Southern California Association of Governments, Connect SoCal Technical Report, adopted September 2020, website: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf. Accessed June 2021.

South Coast Air Quality Management District, 2016 Air Quality Management Plan, March 2017, website: https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15, accessed June 2021.

South Coast Air Quality Management District, California Emissions Estimator Model (CalEEMod Version 2016.3.2), 2017.

South Coast Air Quality Management District, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, May 6, 2005, website: http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf, accessed June 2021.

United States Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971.

United States Environmental Protection Agency, Report No. EPA530-98-010, Characterization of Building Related Construction and Demolition Debris in the United States, July 1998.

United States Environmental Protection Agency, Estimating 2003 Building-Related Construction and Demolition Materials Amounts, 2003.

United States Fish and Wildlife Services, National Wetlands Inventory, Wetlands Mapper, website: https://www.fws.gov/wetlands/data/mapper.html, accessed June 2021.

United States Geological Survey, South Gate Quadrangle, 7.5 – Minuet Series, website: https://ngmdb.usgs.gov/ht-bin/tv_browse.pl?id=d42c45f7ecb3897e069333d2cc244cdd, accessed June 2021.

USA Environmental, Inc., Phase One Environmental Site Assessment Report, October 2020.

Acronyms and Abbreviations

AAM	Annual Arithmetic Mean
AB	Assembly Bill
ACM	Asbestos-containing materials
AEP	Association of Environmental Professionals
AFY	Acre-feet per year
AMI	Southern California Gas Company's Advanced Meter Infrastructure
APN	Assessor Parcel Number
AQMP	Air Quality Management Plan
ASTM	American Society of Testing and Materials
ASTs	above-ground storage tanks
ATCS	Adaptive Traffic Control System
Basin	South Coast Air Basin
BMPs	Best Management Practices
C/D	construction/demolition
CAA	Clean Air Act
CAAQS	California ambient air quality standards
Cal/EPA	California Environmental Protection Agency
Caltrans	California Department of Transportation
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CAT	Climate Action Team
CBC	California Building Code
CCAA	California Clean Air Act
CCAP	Community Climate Action Plan
CCAR	California Climate Action Registry
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CDMG	California Division of Mines and Geology
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
Cf	Cubic feet
CFC	Chlorofluorocarbons
CGS	California Geological Survey
CH_4	Methane
CHMIRS	California Hazardous Material Incident Report System
CMP	Congestion Management Plan
CNDDB	California Natural Diversity Database
CNEL	Community Noise Exposure Level

CO	carbon monoxide
CO_2	carbon dioxide
CO2e	carbon dioxide equivalent
COHb	carboxyhemoglobin
CSD	Community Standards District
COPC	Chemical of Potential Concern
CORRACTS	Corrective Action Treatment, Storage, and Disposal Facilities
County	County of Los Angeles
CPA	Community Plan Area
CPT	cone penetrometer test
CPU	Crime Prevention Unit
CRA	Colorado River Aqueduct
CUSD	Compton Unified School District
CWA	Clean Water Act
CWC	California Water Code
cy	cubic yards
dB	decibel
dBA	A-weighted decibel scale
d/D	flow level
DHS	California Department of Health and Services
DWP	Department of Water and Power
DWR	California Department of Water Resources
du	dwelling unit
EMS	Emergency Medical Service
EOO	Emergency Operations Organization
EPA	Environmental Protection Agency
ERNS	Emergency Response Notification System
EZ	Los Angeles State Enterprise Zone
FAR	Floor Area Ratio
FCAA	Federal Clean Air Act
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
GBCI	Green Building Certification Institute
GHG	greenhouse gas
gpd	gallons per day
gpm	gallons per minute
GSWC	Golden State Water Company
gWh	Gigawatt-hours
GWP	Global Warming Potential
H9	Residential 9
H30	Residential 30

HFC	hydrofluorocarbons
HMAs	Hillside Management Areas
HSA	Hyperion Service Area
HTP	Hyperion Treatment Plant
HVAC	Heating, Ventilation and Air Conditioning
I-105	Glenn Anderson Freeway
I-110	Harbor Freeway
I-710	Long Beach Freeway
IS / MND	Initial Study / Mitigated Negative Declaration
ISO	Interim Control Ordinance
ITE	Institute of Transportation Engineers
JWPCP	Joint Water Pollution Control Plant
km	kilometers
kV	kilovolt
kWh	kilowatt-hours
LAA	Los Angeles Aqueduct
LACDPR	County of Los Angeles Department of Parks and Recreation
LACDPW	County of Los Angeles Department of Public Works
LACFD	Los Angeles County Fire Department
LACSD	Los Angeles County Sheriff's Department
LACWD	Los Angeles County Waterworks Districts
LARWQCB	Los Angeles Regional Water Quality Control Board
LAUSD	Los Angeles Unified School District
LBP	Lead-based paint
lbs/day	pounds per day
LCFS	Low Carbon Fuel Standard
L_{dn}	day-night average noise level
LEED	Leadership in Energy and Environmental Design
L_{eq}	equivalent energy noise level/ambient noise level
LID	Low Impact Development
L_{max}	maximum ambient noise level
L_{min}	minimum ambient noise level
LOS	Level of Service
LST	localized significance thresholds
LUST	leaking underground storage tank
LUTP	Land Use/Transportation Policy
MBTA	Migratory Bird Treaty Act
MCE	Maximum Considered Earthquake
MEP	maximum extent practicable
Metro	Los Angeles County Metropolitan Transit Authority
mgd	million gallons per day
mi	miles

MPO	Metropolitan Planning Organization
MS4	medium and large municipal separate storm sewer systems
msl	mean sea level
mm	millimeters
M_{max}	maximum moment magnitude
MTA	Metropolitan Transportation Authority
MWD	Metropolitan Water District
MWh	Mega-Watt hours
N_2O	nitrous oxide
NAAQS	National ambient air quality standards
NFRAP	No Further Remedial Action Planned Sites
NIFZ	Newport-Inglewood Fault Zone
NO_2	nitrogen dioxide
NOP	Notice of Preparation
NOx	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NPL	National Priorities List
NRCS	U.S. Department of Agriculture Natural Resources Conservation Service
O_3	Ozone
OAL	California Office of Administrative Law
OPR	Office of Planning and Research
Pb	lead
PEC	Potential environmental concern
PFC	perfluorocarbons
PGA	peak horizontal ground acceleration
PM	particulate matter
PM_{10}	respirable particulate matter
$PM_{2.5}$	fine particulate matter
ppd	pounds per day
ppm	parts per million
PPV	peak particle velocity
PRC	Public Resources Code
PSI	pounds per square inch
PUC	Public Utilities Commission (also see CPUC)
PWS	Public water suppliers
R-1	Single-Family Residence Zone
R-3	Limited Multiple Residence Zone
RCP	Regional Comprehensive Plan
RCPG	Regional Comprehensive Plan and Guide
RCRA	Resource Conservation Recovery Act
RD	Reporting District
RDP	Redevelopment Program
REC	Recognized Environmental Condition/Condition
RMS	root mean square

ROG	Reactive Organic Gases
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCG	Southern California Gas Company
SCH	State Clearinghouse
SCS	Sustainable Communities Strategy
SDC	Special Daily Class
sf	square feet
SF_6	sulfur hexafluoride
SIP	State Implementation Plan
SLIC	Spills, Leaks, Investigation and Cleanup
SO_2	sulfur dioxide
SO_4	sulfates
SOx	sulfur oxides
SoCalGas	Southern California Gas Company
SOPA	Society of Professional Archeologist
SPT	Standard Penetration Test
SR-91	Gardena Freeway
SRA	source receptor area
SRRE	Source Reduction and Recycling Element
SWAT	Solid Waste Assessment Test
SWF/LF	Solid Waste Information System
SWFP	Solid Waste Facility Permit
SWMP	stormwater management plan
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resource Control Board
TAC	Toxic Air Contaminants
TIA	Transportation Impact Analysis
TOD	Transit Oriented District
TPH	total petroleum hydrocarbons
TSD	Treatment, Storage, and Disposal
TSP	Transportation Specific Plan
ULSD	Ultra Low Sulfur Diesel
USEPA/ U.S. EPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGBC	United States Green Building Council
USGS	U.S. Geological Survey
UST	underground storage tank

UWMP	Urban Water Management Plan
V/C	Volume-to-Capacity
VCP	Voluntary Cleanup Plan
VCP	Vitrified Clay Pipe
VdB	Vibration decibels
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound
WMA	Watershed Management Area
WMUDS	Waste Management Unit Database System
WSA	Water Supply Assessment
µg/m3	micrograms per cubic meter

Mitigation Monitoring and Reporting Program (MMRP)

Willowbrook III Project / Project No. PRJ2021-000053 **/ Case No(s).** RPPL2021000160, RPPL2021006758, and RPPL2021003907

No.	Environmental Factor	Mitigation Measure	Action Required	When Monitoring to Occur	Responsible Agency or Party	Monitoring Agency or Party
PDF-1	Project Design Feature	All exterior building lighting, security lighting and parking area lighting shall be designed, shielded, directed downward, and located as to avoid intrusive effects on adjacent properties. Low-intensity exterior lighting shall be used throughout the development to the extent feasible, subject to approval by the County. Lighting fixtures shall use shielding to prevent spillover lighting on adjacent off-site uses.	Subject to approval by the County, low-intensity exterior lighting shall be used throughout the development to the extent feasible so that all exterior building lighting, security lighting and parking area lighting shall be designed, shielded, directed downward.	During plan review and construction activities.	Applicant, Contractors	DRP
PDF-2	Project Design Feature	The project shall incorporate water conservation measures in its landscape design and installation. The Project landscape plan shall incorporate the following: • Weather-based irrigation controller with rain shutoff • Matched precipitation (flow) rates for sprinkler heads • Drip/microspray/subsurface irrigation where appropriate • Proper hydro-zoning, turf minimization and use of native/drought tolerant plant materials • Use of landscape contouring to minimize precipitation runoff • A separate water meter (or submeter), flow sensor, and master valve shutoff shall be installed for irrigated landscaped areas totaling 5,000 square feet and greater.	Prior to issuance of grading permits, water conservation measures shall be incorporated into the Project's landscape plan.	During plan review.	Applicant, Contractors	DRP, Public Works
PDF-3	Project Design Feature	The Project shall incorporate the following water conservation features into its design: • Install high-efficiency toilets (maximum 1.28 gpf), including dual-flush water closets, and high-efficiency urinals (maximum 0.5 gpf), including no-flush or waterless urinals, in all restrooms as appropriate.	Prior to issuance of grading permits, water conservation measures shall be incorporated into the Project's design.	During plan review.	Applicant, Contractors	DRP, Public Works

No.	Environmental Factor	Mitigation Measure	Action Required	When Monitoring to Occur	Responsible Agency or Party	Monitoring Agency or Party
		• Install restroom faucets with a maximum flow rate of 1.5 gallons per minute.				
AES-1	Aesthetics	Construction equipment, debris, and stockpiled equipment shall be enclosed within a fenced or visually screened area to effectively block the line of sight from the ground level of neighboring properties. Such barricades or enclosures shall be maintained in appearance throughout the construction period. Graffiti shall be removed within 24 hours of occurrence.	Prior to issuance of grading permits, the plans shall include notes indicating a fenced or Visually screened area would block the line of site. A fenced or visually screened area shall be maintained, and graffiti removed during construction activities.	During plan review and construction activities.	Applicant	DRP
AES-2	Aesthetics	The exterior of the proposed structure shall be constructed of materials to minimize glare and reflected heat, such as, but not limited to, high-performance and/or non-reflective tinted glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces with non-reflective materials.	Prior to approval of plan, the plans shall include materials that minimize glare and reflected heat. During construction activities, materials to minimize glare and reflected heat shall be used when constructing exterior of the proposed structure.	During plan review and construction activities.	Applicant	DRP
CUL-1:	Cultural Resources	If any archaeological materials are encountered during excavation, grading, or construction activities, all further construction activity shall halt in the area of the discovery (not less than 25 feet) and the services of a County-certified archaeologist shall then be secured who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The archaeologist's survey, study or report shall contain recommendations, if necessary, for the preservation, conservation, or relocation of the resource in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083. The Applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study or report to the satisfaction of the Department of Regional Planning.	During construction, if any archaeological materials are encountered activities, a County-certified archaeologist shall then be secured who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall comply with the recommendations of the evaluating archaeologist to the satisfaction of the Department of Regional Planning.	During construction activities.	Applicant	DRP
CUL-2:	Cultural Resources	If paleontological resources are discovered during excavation, grading, or construction, the Los Angeles County Department of Public Works (LACDPW) Building and Safety, shall be notified immediately, and all work construction shall cease in the area of the find (not less than 25 feet) until a County-certified qualified	During construction, if paleontological resources are discovered, a County-certified qualified paleontologist evaluates the find. The Applicant shall comply with the	During construction activities.	Applicant	Public Works and DRP

No.	Environmental Factor	Mitigation Measure	Action Required	When Monitoring to Occur	Responsible Agency or Party	Monitoring Agency or Party
		paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project Site in compliance with the applicable procedures and regulations. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. Found deposits shall be treated in accordance with federal, State, and local guidelines. The Applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study or report to the satisfaction of the County Department of Public Works (LACDPW) Building and Safety and Department of Regional Planning.	recommendations of the evaluating paleontologist to the satisfaction of the LACDPW Building and Safety and Department of Regional Planning.			
NOISE-1	Noise	Construction activities shall be restricted to occur between the hours of 7:00 a.m. and 7:00 p.m. Monday through Saturday, except for emergency work of public service utilities or by variance issued by the health officer and approved by the Los Angeles County Department of Public Works.	Prior to issuance of grading permits, the plans shall include notes indicating compliance with the County of Los Angeles Noise Standards.	Prior to issuance of a grading permit and during grading activities.	Applicant	Public Works and Public Health
NOISE-2	Noise	Construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels. The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices to the extent feasible.	Simultaneous operation of power construction equipment in numbers of three pieces or less. Use of noise shielding and muffling devices on power construction equipment.	During construction activities until Certificate of Occupancy.	Applicant	DRP, Public Health
NOISE-3	Noise	Noise and groundborne vibration construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise- and vibration-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen propagation of noise from such activities towards these land uses to the maximum extent possible.	Operation of aforementioned uses on the	During construction activities until Certificate of Occupancy.	Applicant	DRP, Public Health
NOISE-4	Noise	Barriers such as, but not limited to, plywood structures or flexible sound control curtains extending eight feet in height shall be erected around the perimeter of active construction areas wherever feasible and physically possible to minimize the amount of noise during construction on the nearby noise-sensitive uses. Localized and portable sound enclosures shall be used to	Erection of aforementioned sound barriers around the Project Site perimeter and/or equipment in use.	During construction activities until Certificate of Occupancy.	Applicant	DRP, Public Health

No.	Environmental Factor	Mitigation Measure	Action Required	When Monitoring to Occur	Responsible Agency or Party	Monitoring Agency or Party
		further significantly reduce noise from these types of equipment. Products such as Echo Barrier Outdoor noise barrier/absorbers can provide a 10- to 20-dBA noise reduction or more if the barrier is doubled up.				
TCR -1	Tribal Cultural Resources	A. The project applicant/developer shall retain a Native American monitor from (or approved by) the Gabrieleño Band of Mission Indians – Kizh Nation (the "Kizh" or the "Tribe") - the direct lineal descendants of the project location. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project, at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" includes, but is not limited to, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching. However, after good faith effort to retain a tribal monitor, if the Tribe is non-responsive or unable to provide an on-site monitor at the time of ground disturbing activities, the lead agency may require a third-party monitor and will determine the point at which the applicant may proceed with construction. B. A copy of the executed monitoring agreement shall be provided to the lead agency prior to the earlier of the commencement of any ground-disturbing activity for the project, or the issuance of any permit necessary to commence a ground-disturbing activity. If a monitoring agreement cannot be obtained, the Applicant shall provide the lead agency with written records demonstrating a good faith effort has been made to engage a tribal monitor from the Gabrieleño Band of Mission Indians – Kizh Nation. C. The project applicant/developer shall provide the Tribe with a minimum of 30 days advance written notice of the commencement of construction so that the Tribe has sufficient time to secure and schedule a monitor for the project. The Applicant shall	Prior to ground disturbing activities on the Project Site, the project applicant/developer shall retain a Native American monitor from (or approved by) the Gabrieleño Band of Mission Indians – Kizh Nation (the "Kizh" or the "Tribe")	During construction activities.	Applicant, Contractors, Native American Monitor	DRP

No.	Environmental Factor	Mitigation Measure	Action Required	When Monitoring to Occur	Responsible Agency or Party	Monitoring Agency or Party
		provide the Tribe advanced notice of any scheduling changes pertaining to ground disturbing activities. D. The project applicant/developer shall hold at least one (1) pre-construction sensitivity/educational meeting prior to the commencement of any ground-disturbing activities, where a senior member of the Tribe will inform and educate the project's construction and managerial crew and staff members (including any project subcontractors and consultants) about the TCR mitigation measures and compliance obligations, as well as places of significance located on the project site (if any), the appearance of potential TCRs, and other informational and operational guidance to aid in the project's compliance with the TCR mitigation measures. E. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs shall be provided to the project applicant/developer and lead agency on a weekly basis. F. Native American monitoring for the project shall conclude upon the latter of the following: (1) written confirmation from a designated project point of contact to the Tribe that all ground-disturbing activities and all phases that may involve ground-disturbing activities on the project site and at any off-site project location are complete; or (2) written notice by the Tribe to the project applicant/lead agency that no future, planned construction activity				

No.	Environmental Factor	Mitigation Measure	Action Required	When Monitoring to Occur	Responsible Agency or Party	Monitoring Agency or Party
		and/or development/construction phase (known by the Tribe at that time) at the project site and at any off-site project location possesses the potential to impact TCRs.				
TCR -2	Tribal Cultural Resources	A. Upon the discovery of a TCR, all construction activities in the immediate vicinity of the discovery (i.e., not less than the surrounding 25 feet) shall cease. The monitor shall evaluate the TCR and advise the project manager regarding the matter, protocol, and any mitigating requirements. No project construction activities shall resume in the surrounding 25 feet of the discovered TCR unless and until the Tribe has completed its assessment/evaluation/recovery of the discovered TCR and surveyed the surrounding area. B. The Tribe will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate in its sole discretion, and for any purpose the Tribe deems appropriate, including but not limited to, educational, cultural and/or historic purposes. C. If Native American human remains and/or grave goods are discovered or recognized on the project site or at any off-site project location, then all construction activities shall immediately cease in the vicinity of the remains. Native American "human remains" are defined to include "an inhumation or cremation, and in any state of decomposition or skeletal completeness." (Pub. Res. Code § 5097.98 (d)(1).) Funerary objects, referred to as "associated grave goods," shall be treated in the same manner and with the same dignity and respect as human remains. (Pub. Res. Code § 5097.98 (a), d)(1) and (2).) D. Any discoveries of human skeletal material or human remains shall be immediately reported to the County Coroner (Health & Safety Code § 7050.5(c); 14 Cal. Code Regs. § 15064.5(e)(1)(B)), and all ground-disturbing project ground-disturbing activities on site and in any other area where the presence of	During construction, upon the discovery of a TCR, all construction activities in the immediate vicinity of the discovery (i.e., not less than the surrounding 25 feet) shall cease. The Tribe will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate in its sole discretion.	During construction activities.	Applicant, Contractors, Native American Monitor	DRP

No.	Environmental Factor	Mitigation Measure	Action Required	When Monitoring to Occur	Responsible Agency or Party	Monitoring Agency or Party
		human remains and/or grave goods are suspected to be present, shall immediately halt and remain halted until the coroner has determined the nature of the remains. (14 Cal. Code Regs. § 15064.5(e).) If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, within 24 hours, the Native American Heritage Commission, and Public Resources Code Section 5097.98 shall be followed. E. Thereafter, construction activities may resume in other parts of the project site at a minimum of 50 feet away from discovered human remains and/or grave goods, if the Tribe determines in its sole discretion that resuming construction activities at that distance is acceptable and provides the project manager express consent of that determination (along with any other mitigation measures the Tribal monitor deems necessary). (14 Cal. Code Regs. § 15064.5(f).) F. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or grave goods.				
UTIL-1	Utilities	A Sewer Area Study analyzing the project impact on the existing sewerage system shall be submitted to the Department of Public Works for review and approval prior to the commencement of the construction activities. Should the sewer area study show adverse impacts to the existing system, pipe replacement/upsizing shall be necessary and the sole responsibility of the Applicant.	Prior to the commencement of the construction activities, A Sewer Area Study analyzing the project impact on the existing sewerage system shall be submitted to the Department of Public Works for review and approval.	Prior to the construction activities.	Applicant	Public Works