

II. COMMENTS AND RESPONSES TO THE DRAFT EIR

The Draft EIR was available for a 45-day public review period between November 18, 2010 and January 2, 2011. During this period, 11 written comments on the Draft EIR were received. This chapter provides responses to all written comments received on the Draft EIR during the 45-day public review period. Comments included issues raised by the public that warrant clarification or correction of certain statements in the Draft EIR, but none of the corrections and additions constitute significant new information as defined by CEQA Guidelines Section 15088.5.

RESPONSE TO WRITTEN COMMENTS

Each comment letter has been assigned a number. The body of each comment letter has been separated into individual comments, which also have been numbered. This results in a tiered numbering system, whereby the first comment in Letter 1 is depicted as Comment 1-1, and so on. These numbered comment letters are included in their entirety, followed by the corresponding responses.

Comment Letter No. 1 was an omnibus letter from the County of Los Angeles including comments submitted on behalf of the County of Los Angeles Departments of Animal Care and Control, Fire, Parks and Recreation, Public Health, Public Works, Regional Planning, and Sheriff. The departmental comment letters from the County Departments of Animal Care and Control, Public Works, Fire, and Public Library were also sent on their own directly to the City of Angeles Department of City Planning and are included as Comment Letter Nos. 2, 3, 4, and 5, respectively. Responses to the departmental comment letters from the County Departments of Parks and Recreation, Public Health, Regional Planning, and Sheriff are provided as responses to Comment Letter No. 1.

The following presents a list of all the written commentors on the Draft EIR:

1. County of Los Angeles
Chief Executive Office
Kenneth Hahn Hall of Administration
500 West Temple Street, Room 713
Los Angeles California 90012
William Fujioka, Chief Executive Office
December 29, 2010
2. County of Los Angeles
Department of Animal Care and Control
Administrative Office
David Dijkstra, Chief Deputy Director
December 8, 2010
3. County of Los Angeles
Department of Public Works
900 South Fremont Avenue
Alhambra, CA 91803
Gail Farber, Director
December 2, 2010

4. County of Los Angeles
Fire Department
1320 North Eastern Avenue
Los Angeles, CA 90063-3204
John Todd, Chief, Forestry Division, Prevention Services Bureau
December 2, 2010
5. County of Los Angeles
Public Library
7400 East Imperial Highway
Downey, Ca 90242
Yolanda De Ramus, Assistant Director, Administrative Services
December 23, 2010
6. Hartzog & Crabill, on behalf of the City of South Gate
275 Centennial Way, Suite 208
Tustin, CA 92780
Scott Ma, Senior Engineer
December 30, 2010
7. Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012-2952
Scott Hartwell, CEQA Review Coordinator, Long Range Planning
December 29, 2010
8. South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765-4182
Ian MacMillan, Program Supervisor, CEQA Inter-Governmental Review
January 4, 2011
9. Latham & Watkins, on behalf of Atlas Iron & Metal Company
355 South Grand Avenue
Los Angeles, CA 90071-1560
James Arnone
December 31, 2010
10. Los Angeles Conservancy
523 West Sixth Street, Suite 826
Los Angeles, CA 90014
Adrian Scott Fine
December 30, 2010
11. Governors' Office of Planning and Research
State Clearinghouse and Planning Unit
1400 10th Street
P.O. Box 3044
Sacramento CA 95812-3044

Letter No. 1

County of Los Angeles
CHIEF EXECUTIVE OFFICE

Kenneth Hahn Hall of Administration
500 West Temple Street, Room 713, Los Angeles, California 90012
(213) 974-1101
<http://ceo.lacounty.gov>



WILLIAM T FUJIOKA
Chief Executive Officer

December 29, 2010

Adam Villani, Environmental Review Coordinator
City of Los Angeles
Department of City Planning
200 North Spring Street, Room 750
Los Angeles, CA 90012

Dear Mr. Villani:

**REVIEW OF THE DRAFT ENVIRONMENTAL IMPACT REPORT
FOR THE JORDAN DOWNS SPECIFIC PLAN (SCH# 2010021007)**

The County of Los Angeles (County) appreciates the opportunity to review and provide comments on the City of Los Angeles' (City) Draft Environmental Impact Report (DEIR) for the Jordan Downs Specific Plan (Project). The County's comments are submitted on behalf of the following departments:

- Animal Care and Control
- Fire
- Parks and Recreation
- Public Health
- Public Library
- Public Works
- Regional Planning
- Sheriff

Summarized below are the Departments' major concerns/comments related to the DEIR. As this is not a comprehensive summary, please refer to the attached departmental letters for further details.

Department of Animal Care and Control:

- Given the development of up to 1,800 dwelling units, the Environmental Impact Report (EIR) should address enhanced service level requirements related to the potential for stray animals and animals requiring spay and neuter services.

Board of Supervisors
GLORIA MOLINA
First District

MARK RIDLEY-THOMAS
Second District

ZEV YAROSLAVSKY
Third District

DON KNABE
Fourth District

MICHAEL D. ANTONOVICH
Fifth District

1-1

1-2

"To Enrich Lives Through Effective And Caring Service"

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- The development of multi-purpose design features, such as fencing, is recommended for incorporation into the northeast portion of the Project design. The purpose for this recommendation is to mitigate the propagation of stray animals that may wander into the adjacent unincorporated area as a result of an increase in population at the proposed Project site.

1-2
(cont.)

Fire Department:

- DEIR-Section IV.N-4 (Public Services) - incorrectly identifies staffing at Fire Station 41. Information is provided in the Fire Department's attached letter.
- While the *Health Hazardous Materials Division* has no objection to the proposed Project, properties with historical use or storage of hazardous material on-site may be contaminated. These properties should obtain a "No Further Action Letter" from a local or State agency prior to development of the Project.

1-3

Department of Parks and Recreation:

- In the County's response to the Notice of Preparation (NOP) of an Environmental Impact Report for the Project, DPR suggested a significantly reduced project density and/or inclusion of additional open space acreage to the Project to mitigate the potential adverse impact on the use of County parks. Based on the DEIR, the proposed park acreage, open space, family resource center, gym and pool addresses the recreational needs of the proposed Project.

1-4

Department of Public Health (DPH):

- Additional staff resources will be required from the DPH Bureau of District Surveillance and Enforcement for plan check review, construction inspection, public health permitting and routine inspection services for the retail/commercial component of the Project. The EIR should address the additional DPH resource requirements for the Project.

1-5

Public Library:

Although the DEIR provides that Housing Authority of the City of Los Angeles shall consult with the Los Angeles Public Library to develop a plan to build a library sub-branch on-site (Mitigation Measure PS10), Public Library specifically states that the population increase from the Project would detrimentally affect the service capacity of the County's Graham Library due to its convenient proximity to the Project area. It is critical that a new Library is built within the Project area.

1-6

Department of Public Works (DPW):

- DEIR-Section IV.P. (Transportation & Traffic) – The mitigation measure identified as TT1 should be revised to state that the applicant shall be solely responsible for the design and construction of the traffic signal at the intersection of Alameda Street at 97th Street.
- The EIR should analyze adjacent County related projects. A list of related projects administered by the County can be obtained from the County Department of Regional Planning.
- The Traffic Impact Study should analyze the level of service at the County and/or County/City intersections using the County's methodology. Based on the County's methodology, the Project is expected to have a significant impact at the intersection of Wilmington Avenue and the I-105 Eastbound Ramps, which needs to be addressed in the EIR.
- The EIR should address whether or not the 97th Street right-of-way will become a City right-of-way. The portion of the right-of-way between the current City/County border and Alameda Street needs to either become 100 percent City or split between the Cities of Los Angeles and Lynwood since there will no longer be any County jurisdiction in this area.
- The EIR should address whether or not the City will assume jurisdiction of all of Alameda Street between 97th and 103rd Streets.
- As all or a portion of the project is located within a potentially liquefiable area per the State of California Seismic Hazard Zones Map – South Gate Triangle, the EIR should include, as necessary, reports from the DPW Geotechnical and Materials Engineering Division.

1-7

Department of Regional Planning (DRP):

- Land Use and Planning - the proposed Project and annexation provide a logical boundary to maintain physical and neighborhood integrity for the remaining unincorporated Florence-Firestone community.
- Regional Housing Needs Allocation (RHNA) - The Department has calculated a transfer amount of zero units associated with the proposed annexation of County unincorporated area under the Project using a methodology that attempts to mimic the Southern California Association of Governments RHNA methodology.

1-8

Mr. Adam Villani
December 29, 2010
Page 4

Sheriff's Department:

Given the potential population increase for the proposed Project, the Sheriff would appreciate an evaluation of future law enforcement service levels to address:

- An increase in calls for service in surrounding areas and a corresponding need to increase traffic and enforcement services;
- An increase in vehicular traffic on Alameda and surrounding streets; and
- A lack of parking for the increased population and existing residents.

1-9

Please contact the Sheriff's Department directly to address the above concerns.

The County appreciates the City of Los Angeles addressing the issues raised by the County in the Final EIR. If you have any questions, please contact Dorothea Park at (213) 974-4283, or via e-mail at dpark@ceo.lacounty.gov. If you need clarification regarding specific comments, please contact the respective County department staff identified in the attached letters.

Sincerely,

William T Fujioka by Allen Sadt

WILLIAM T FUJIOKA
Chief Executive Officer

WTF:RLR
DSP:AG:acn

Attachments (8)

- c: Supervisor Gloria Molina, First Supervisorial District
Supervisor Mark Ridley-Thomas, Second Supervisorial District
Leroy D. Baca, Sheriff
Marcia Mayeda, Director of Animal Care and Control
P. Michael Freeman, Fire Chief
Russ Guiney, Director of Parks and Recreation
Richard J. Bruckner, Director of Planning
Dr. Jonathan E. Fielding, Director and Health Officer of Public Health
Margaret Donnellan Todd, County Librarian
Gail Farber, Director of Public Works



Marcia Mayeda
Director

County of Los Angeles
Department of Animal Care and Control

Administrative Office
5898 Cherry Avenue
Long Beach, California 90805
(562) 728-4610 • Fax (562) 422-3478
<http://animalcare.lacounty.gov>



December 8, 2010

Shelter Locations

Downey Shelter
11258 S. Garfield Ave.
Downey, CA 90242
(562) 940-6898

Carson Shelter
216 W. Victoria St.
Gardena, CA 90248
(310) 523-9566

Baldwin Park Shelter
4275 N. Elton St.
Baldwin Park, CA 91706
(626) 962-3577

Lancaster Shelter
5210 W. Avenue I
Lancaster, CA 93536
(661) 940-4191

Castaic Shelter
31044 N. Charlie Cyn.
Road
Castaic, CA 91384
(661) 257-3191

Agoura Shelter
29525 Agoura Rd
Agoura, CA 91301
(818) 991-0071

Major Case Unit
11258 S. Garfield Ave.
Downey, CA 90242
(562) 658-2000

Mr. Adam Villani, Environmental Review Coordinator
Department of City Planning
City of Los Angeles
200 North Spring Street, Room 750
Los Angeles, CA 90012-4801

Dear Mr. Villani:

RESPONSE TO DRAFT ENVIRONMENTAL IMPACT REPORT

In reviewing the Draft Environmental Impact Report, it is deemed there would be minimal impact on the County of Los Angeles Department of Animal Care and Control. The impact to net County cost would not be significant. Our records indicate that over the recent 12-month period, eight animals were impounded from the Project Site and 22 calls for service were handled. Of these 22 calls for service, 15 calls involved two specific addresses and related to similar concerns or requests.

The development of up to 1,800 new dwelling units at the overall Project Site could increase the propensity for stray animals in the general vicinity. The City of Los Angeles Animal Services would be responsible for animal control services within the entire Project Site subsequent to annexation of the required unincorporated parcels.

In an effort to deter animals from straying from the northeast portion of the Project Site into the adjacent unincorporated community, multi-purpose design features such as fencing could be incorporated into the project. Such features would not only deter the propagation of stray animals but could provide benefits related to the general safety of residents.

If you have any questions or need additional information, please contact Patrick Malekian at (562) 256-2400.

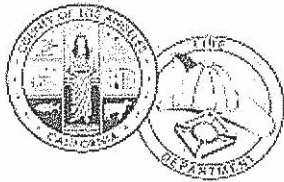
Sincerely,

David Dijkstra
Chief Deputy Director

DD:PM:jl

c: Dorothea Park, Chief Executive Office

1-10



COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90065-3294

(323) 890-4330

P. MICHAEL FREEMAN
FIRE CHIEF
FORESTER & FIRE WARDEN

December 2, 2010

Adam Villani, Environmental Coordinator
Department of City Planning
Planning Section
200 North Spring Street, Room 750
Los Angeles, CA 90012

Dear Mr. Villani:

NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT, NO. ENV-2010-0032, STATE CLEARINGHOUSE NO. 2010021007, JORDAN DOWNS SPECIFIC PLAN, LOS ANGELES (FFER #201000236)

The Notice of Availability of a Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

PLANNING DIVISION:

Public Services

- Paragraph three should be corrected to state, "Fire Station 41 is located approximately 1.5 miles south of the annexation area. Fire Station 41 has a daily staff of six who have the following assignments: one Captain, one Fire Fighter Specialist, one Fire Fighter/Paramedic and one Fire Fighter assigned to a four-person assessment engine company and; two Fire Fighter/Paramedics assigned to a two-person paramedic squad."

1-11

LAND DEVELOPMENT UNIT:

- This project is located entirely in the City of Los Angeles. Therefore, the City of Los Angeles Fire Department has jurisdiction concerning this project and will be setting conditions. This project is located in close proximity to the jurisdictional area of the Los Angeles County Fire Department. However, this project is unlikely to have an impact that necessitates a comment concerning general requirements from the Land Development Unit of the Los Angeles County Fire Department.

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

YGO, BA HILLS	BRADBURY	LULUVAI	RAWHORSE	LA SERADA	MAJIB	POBONA	SIGNAL HILL
VEREDA	CAYABASAN	DIAMOND BAR	HIDDEN HILLS	LA PUENTE	MAYWOOD	RANCHO PALMS VERDES	SOUTH EL MONTE
VERSA	CARSON	DUARTE	JOHN GINGRONS PARK	LAKWOOD	SORWALK	ROLLING HILLS	SOUTH GATE
BAFFORD PARK	CERRITOS	EL MONTE	INDUSTRY	LANCASTER	PALMDALE	ROLLING HILLS ESTATES	TEMPLE CITY
BEFL	CLAREMONT	GARDENA	INGLEWOOD	CANONVILLE	PALMS VERDES ESTATES	ROSEMEAD	WALNUT
BEFL GARDENS	COMMERCE	GLENDORA	IRVINDALE	LOMITA	PARAMOUNT	SAN DIMAS	WEST HOLLYWOOD
BEFL DOWNS	COVINA	HAWAIIAN GARDENS	LA CANADA TRINTRIDGE	LYNWOOD	PORTO RIVERA	SANTA CLARITA	WEST LAKE VILLAGE
			LA HABRA				WHITTIER

2. This project does not propose construction of structures or any other improvements at this time. Therefore, until actual construction is proposed, the project will not have a significant impact to the Fire Department, Land Development Unit.
3. The statutory responsibilities of the County of Los Angeles Fire Department, Land Development Unit, are the review of, and comment on, all projects within the unincorporated areas of the County of Los Angeles. Our emphasis is on the availability of sufficient water supplies for fire fighting operations and local/regional access issues. However, we review all projects for issues that may have a significant impact on the County of Los Angeles Fire Department. We are responsible for the review of all projects within Contract Cities (Cities that contract with the County of Los Angeles Fire Department for fire protection services).

We are responsible for all County facilities located within non-contract Cities. The County of Los Angeles Fire Department, Land Development Unit may also comment on conditions that may be imposed on a project by the Fire Prevention Division, which may create a potentially significant impact to the environment.
4. Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department, Land Development Unit's Inspector, Claudia Soiza, at (323) 890-4243.

1-11
(cont.)

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:


1. The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance.
2. The areas germane to the statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division have been addressed.

HEALTH HAZARDOUS MATERIALS DIVISION:

1. The Health Hazardous Materials Division has no objection to the proposed project. However, it should be noted that properties with historical use or storage of hazardous materials onsite may be contaminated. These properties should obtain a "No Further Action Letter" from a local or State agency prior to redevelopment.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,



JOHN R. TODD, CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

JRT:lj



COUNTY OF LOS ANGELES
DEPARTMENT OF PARKS AND RECREATION
"Creating Community Through People, Parks and Programs"

Russ Guiney, Director

December 22, 2010

Mr. Adam Villani, Environmental Review Coordinator
Los Angeles City Department of City Planning
200 N Spring Street, Room 750
Los Angeles, CA 90012-4801

Dear Mr. Villani:

**DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) FOR JORDAN DOWNS
CASE NO. ENV-2010-32-EIR
STATE CLEARINGHOUSE NO. 2010021007**

1-12

The Draft EIR for the subject project has been reviewed for potential impacts on the facilities of the Department of Park and Recreation (DPR) for which we offer the following comments.

Page IV. O-1

The description of County parks under "Environmental Setting" should be consistent with the Park Classifications from the draft Parks and Recreation Element of the County of Los Angeles General Plan (see attachment).

1-13

Page IV. O-2, Figure IV. O-1

Under County parks, #2 should be Walnut Nature Pocket Park and #7 should be Earvin "Magic" Johnson Recreation Center Area.

1-14

Page IV.O-3, Table IV.O-1

Walnut Nature Pocket Park should be Walnut Nature Park.

Page IV.O-4, 1st paragraph

Florence-Firestone does not currently have a community plan, although one will be prepared next year. At this time, any reference to the Florence-Firestone Community Plan Area (CPA) should be changed to the Florence-Firestone Park Planning Area (PPA).

1-15

Page IV.O-4, Footnote 5

CPA should be changed to PPA.

Page IV.O-4, Footnote 6

Please add as indicated, "Draft Florence-Firestone Community Parks and Recreation Plan."

1-16

Page IV.O-5

Under "County of Los Angeles, Conservation and Open Space Element", the standards for the provision of parkland should be clarified as follows: four (4) acres of local parkland per 1,000 residents of the population in the County's unincorporated areas and six (6) acres of regional parkland per 1,000 residents of the County's total population. Please also note that the County is in the process of updating its General Plan. This update will include a separate Parks and Recreation Element.

1-17

Page IV.O-5, Footnote 10

Region should be Regional (Department of Regional Planning).

1-18

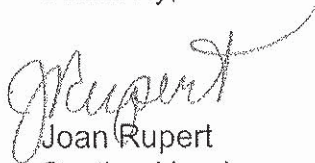
Page IV. O-6 and 7

The Draft EIR describes the development of a 6.38 acre park, 2.57 acres of additional open space, and another 2.41 acres developed with a 50,000 square foot family resource center, a 17,000 square foot joint use gym and a 3,000 square foot pool facility. The resulting 11.36 acres of land for park and recreation facilities along with the estimated \$40 million (land and construction costs) addresses the recreational needs of the proposed project.

1-19

Thank you for including this Department in the review process. If we may be of further assistance, please contact Julie Yom at (213) 351-5127 or jyom@parks.lacounty.gov.

Sincerely,



Joan Rupert
Section Head
Environmental & Regulatory Permitting Section

CL:JY/ DEIR Jordan Downs

Enclosures: Park Classifications

c: Parks and Recreation (N. E. Garcia, L. Hensley, J. Barber, C. Lau, J. Yom)

The County standard for the provision of parkland is four (4) acres of local parkland per 1,000 residents of the population in the County's unincorporated areas, and six (6) acres of regional parkland per 1,000 residents of the County's total population.

The County offers a wide variety of parks and recreation resources. These facilities generally fall under two systems: local system and regional system.

Local System

The local system consists of parks of varying sizes that meet local needs and offer opportunities for daily recreation. This system includes community parks, neighborhood parks, pocket parks, and open space nodes, and is summarized in Table 7.2.

- **Community Parks:** Community parks are typically 10-20 acres, and serve several neighborhoods within a 1 to 2 miles radius of the park. Where community parks are located in residential neighborhoods, they serve both the needs of the community park service radius and neighborhood park service radius. Community parks serve a wide variety of active and passive recreation activities communitywide. The amenities programmed into a community park are focused on meeting the needs of several neighborhoods or large sections of the community. They allow for group activities and recreational opportunities that may not be feasible in neighborhood parks. Amenities for community parks can include informal open play areas, children's play apparatus, family and group picnic areas with overhead shelters, barbecues, lighted sports fields, basketball courts and tennis courts, public restrooms, concession building, maintenance building, onsite parking and information kiosks.
- **Neighborhood Parks:** Neighborhood parks are typically 3-10 acres, and serve residents living within a half-mile radius of the park. Neighborhood parks provide space and recreation activities to create healthy social networks within residential communities via programs and facilities. The common objective of all neighborhood parks is to bring people together to recreate and socialize close to home. Ease of access and walking distance uninterrupted by major roads and other physical barriers are important factors in locating neighborhood parks. Neighborhood parks should be well connected to other public facilities such as schools and libraries. Amenities for neighborhood parks can include informal open play areas, children's play apparatus, picnic tables, picnic shelters, barbecues, practice sports fields, basketball, tennis and volleyball courts, public restrooms, information kiosks, recreation offices, and onsite parking.
- **Pocket Parks:** Pocket parks are less than three acres in size, and serve residential or business areas within a quarter-mile radius or within a walking distance. They are best used to meet limited or specialized

recreational needs. Pocket parks can provide landscaped public use areas in industrial and commercial areas, scenic overlooks, linkage to a community pathway system, and urban infill sites in park-poor communities. Pocket parks generally do not have on-site parking. Amenities for pocket parks can include both active and passive features, depending on the community's setting and needs, such as children's play apparatus, picnic areas, fountains and seating areas. Due to the limited amenities included in pocket parks, they are typically not included in the service radius analysis.

- **Park Nodes:** Park nodes are small pieces of open space that serve as public destinations, connections, and community defining spaces. Nodes provide physical and visual breaks to the urban landscape and connect various spaces, such as waterways, streets, trails, and greenways. Park nodes are used as gathering and rest areas, and serve as opportunities for social and cultural exchange. Examples of park nodes include equestrian and hiking trail heads, bike rest stops and stations with lockers and repair areas, neighborhood focal points, and passive amenities such as plazas, rest areas, playgrounds, landmarks, and public art installations.

Table 7.2: Local Park System Summary

Facility	Typical Park Features and Amenities
<p>Community Park</p> <p>Acres Per Thousand Population:4 / 1,000</p> <p>Suggested Acreage:10-20 acres</p> <p>Service Area:1–2 mile</p>	<p>Passive Park Amenities including but not limited to: informal open play areas, children's play apparatus, family and group picnic areas with overhead shelters, barbecues.</p> <p>Active Sports Activities including but not limited to: lighted sports fields, basketball courts and tennis courts. Additional amenities may include aquatics complex, skate park, arena soccer, roller hockey, community gardens, and dog parks.</p> <p>Park Facilities including but not limited to: public restrooms, concession building, community buildings, maintenance building and on-site parking and informational kiosks.</p>
<p>Neighborhood Park</p> <p>Acres Per Thousand Population:4 / 1,000</p> <p>Suggested Acreage:3-10 acres</p> <p>Service Area:1–2 mile</p>	<p>Passive Park Amenities including but not limited to: informal open play areas, children's play apparatus, family picnic areas with overhead shelters, barbecues.</p> <p>Active Park Amenities including but not limited to: practice sports fields, basketball, tennis, and volleyball courts.</p> <p>Park Facilities including but not limited to: public restroom, on-site parking and informational kiosks.</p>
<p>Pocket Park</p> <p>Acres Per Thousand Population:4 / 1,000</p> <p>Suggested Acreage: less than 3 acres</p>	<p>Passive Park Amenities including but not limited to: picnic areas and seating areas</p> <p>Active Park Amenities including but not limited to: children's play apparatus</p>

Service Area: 1/4 mile	
Park Node Acres Per Thousand Population: 4 / 1,000 Suggested Acreage: 1/4 acre or less Service Area: no service radius area	Varies, can include: plazas, rest areas, playgrounds, landmarks and public art installations

Regional System

The regional system is intended to meet the park and recreation needs of residents and visitors throughout the County. This system consists of community regional parks, regional parks, and special use facilities, and is summarized in Table 7.3.

- **Community Regional Parks:** Neighborhood parks are typically 20-100 acres, and have a service radius of 20 miles. Community regional parks protect natural resources, preserve open spaces, and provide recreational facilities that are not available in neighborhood or community parks. Amenities for community regional parks can include a jogging exercise course, informal open play areas, children’s play apparatus, family and group picnic areas with overhead shelters, barbecues, lighted sports fields, basketball courts and tennis courts, information kiosks, public restrooms, concession building, recreation offices, maintenance buildings, and on-site parking. Community regional parks may also have one or more of the following features: multiple sports facilities, aquatics center, fishing lake, community building and gymnasium, and outstanding views and vistas.
- **Regional Parks:** Regional parks are typically greater than 100 acres in size, and have a service radius of 25 miles or more. They include unique areas such as lakes, wetlands, auditoriums, water bodies, and campgrounds, in addition to active recreational facilities often offered in community and community regional parks. Many of the recreational activities are associated with experiencing the natural environment. A regional park may also perform important ecological and environmental functions, including serving as wildlife habitats. The connection of these parks to natural areas is often vital to ensuring a healthy ecological system. Amenities for regional parks can include: picnic areas, nature centers, trail systems, scenic drives, campgrounds, water areas for swimming, fishing and boating, and in some cases, sport fields.

- Special Use Facilities:** Special use facilities are generally single purpose facilities that serve the greater regional recreational or cultural needs in the County. One notable example of such a facility is the Hollywood Bowl. Special use facilities require adequate public access and sufficient buffers to protect adjacent residential users and to insulate the park from commercial or industrial development. Special use facilities can provide both passive (e.g. historic and cultural facilities, natural areas, habitat preservation areas, arboreta and botanical gardens, and nature centers) and active (e.g. golf courses and driving ranges, equestrian centers, off-highway vehicle (OHV) parks, water parks or aquatic facilities, and skate parks) needs within the region. There are no size criteria or service area associated with special use facilities.

Table 7.3: Regional Park System Summary

Facility	Typical Park Features and Amenities
<p>Community Regional Park</p> <p>Acres Per Thousand Population: 6 / 1,000</p> <p>Suggested Acreage: 20-100 acres</p> <p>Service Area: up to 20 miles</p>	<p>Passive Park Amenities including but not limited to: informal open play areas, children's play apparatus, family and group picnic areas with overhead shelters, barbecues.</p> <p>Active Sports Activities including but not limited to: lighted sports fields, basketball courts and tennis courts.</p> <p>Additional amenities may include one or more of the following features: multiple sports facilities, aquatics center, fishing lake, community building and gymnasium, and outstanding views and vistas.</p> <p>Park Facilities including but not limited to: public restrooms, concession building, community buildings, maintenance building and on-site parking and informational kiosks.</p>
<p>Regional Park</p> <p>Acres Per Thousand Population: 6 / 1,000</p> <p>Suggested Acreage: greater than 100 acres</p> <p>Service Area: 25+ acres</p>	<p>Passive Park Amenities including but not limited to: group picnic areas with overhead shelters, barbecues.</p> <p>Additional amenities may include one or more of the following features: lakes, wetlands, auditoriums, water bodies for swimming, fishing and boating, and sports fields.</p>
<p>Special Use Facility</p> <p>Acres Per Thousand Population: 6 / 1,000</p> <p>Suggested Acreage: no size criteria</p> <p>Service Area: no assigned service radius area</p>	<p>Generally single purpose facilities. Can include passive features such as: wilderness parks, nature preserves, botanical gardens and nature centers.</p> <p>Active uses can include: performing arts, water parks, aquatic facilities, skate parks, golf driving ranges and golf courses.</p>



JONATHAN E. FIELDING, M.D., M.P.H.
Director and Health Officer

JONATHAN E. FREEDMAN
Chief Deputy Director

ANGELO J. BELLOMO, REHS
Director of Environmental Health

KENNETH MURRAY, REHS
Director, Bureau of District Surveillance and Enforcement

5050 Commerce Drive
Baldwin Park, California 91706
TEL (626) 430-5330 • FAX (626) 430-4834

www.publichealth.lacounty.gov

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December 14, 2010

TO: Angela Gentry
Chief Executive Office
Office of Unincorporated Area Services

FROM: Kenneth S. Murray, REHS, *Kenneth Murray*
Director of Bureau of District Surveillance and Enforcement
Environmental Health Division

SUBJECT: NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT
FOR THE JORDAN DOWNS SPECIFIC PLAN

The Department of Public Health – Environmental Health Division has reviewed the Draft Environmental Impact Report (DEIR) for the project identified above. The project includes the implementation of the Specific Plan to redevelop the Jordan Downs public housing complex and transform the Specific Plan area into a mixed-use development to include new homes, schools, parks, and community facilities.

1-21

After reviewing the DEIR, we anticipate that there will be impacts on the services provided by the Department's Bureau of District Surveillance and Enforcement. The retail/commercial component of the specific plan will require additional services, such as plan check review, construction inspection, public health permitting, and routine inspections. Such services will require additional staff time and resources to accomplish.

1-22

If you should have any regarding the above comments, please feel free to contact me at (626) 430-5200.

KM:kh



County of Los Angeles Public Library ■ www.colapublib.org
7400 East Imperial Hwy., Downey, CA 90242 ■ (562) 940-8400



Margaret Donnellan Todd
County Librarian

December 23, 2010

Adam Villani
Environmental Review Coordinator
Los Angeles Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Dear Mr. Villani:

**NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT
NO. ENV-2010-0032-EIR
FOR THE JORDAN DOWNS SPECIFIC PLAN**

This is to provide you with written comments on the Notice of Availability of a Draft Environmental Impact Report (DEIR) for the above referenced project. In summary, the Jordan Downs Specific Plan involves the development of 1,800 residential units. While the majority of the Specific Plan area is within the City of Los Angeles (City), approximately 41.74 acres are within the unincorporated areas of the County of Los Angeles (County). The Specific Plan also involves the annexation of the unincorporated areas to the City.

The existing residents of the unincorporated areas are currently served by the County's Graham Library. However, as indicated in the DEIR and in the County Library's previous comments, the City of Los Angeles will be responsible to provide library services to all project residents, if the proposed annexation is approved.

It is critical that a new library is built within the Specific Plan area. According to the DEIR, the City's existing Watts Branch Library, which currently serves the City portion of the Specific Plan area, does not meet the City's branch library facility size standards and the City does not have any plans to expand the Watts Branch Library or construct a new facility within the vicinity of the Watts community. Without an on-site library facility within the Specific Plan area, the population increase from the Project would detrimentally affect the service capacity of the County's Graham Library due to its convenient proximity to the Specific Plan area. The Graham Library is already inadequate to effectively serve the existing residents of its service area.

Other Comments/Corrections on the County Library's Section:

The proposed deletions and insertions are indicated in **bold font**.

Page IV.N-15 – Public Services - County of Los Angeles Public Library

The LACPL system comprises **8886** community libraries and **4 bookmobiles** throughout Los

Adam Villani
December 23, 2010
Page 2

Angeles County. The Annexation Area is within the service area of the LAPL Graham Library (Figure IV.N-5). The Graham Library is located approximately 0.80 miles northwest of the Specific Plan area at 1900 East Firestone Boulevard. The Graham Library is a ~~5,145~~ **5,125** square-foot facility that houses a collection of ~~59,831~~ **44,554 materials which includes books, 4837** audio recordings, and ~~74~~ magazine and newspaper subscriptions.⁴⁴-The Graham Public Library has an estimated service population of 35,387.^{42,43}

To determine the adequate level of service required for a population served by a LACPL branch community library, the LACPL utilizes a materials-to-resident ratio and a facility square footage-to-resident ratio. The LACPL materials-to-residents ratio is 2.75 materials to one resident.⁴⁴ Based upon the LACPL materials-to-resident ratio, the Graham Library service population would require 97,314 materials to be adequately served. Currently, the Graham Library has ~~64,739~~ **44,554** materials and is deficient by ~~32,575~~ **52,760** materials. The LACPL facility square footage-to-resident ratio is 0.5 square foot to one resident.⁴⁵ Based upon the LACPL facility square footage-to-resident ratio, the service population of the Graham Library requires a ~~17,693~~ **17,694**-square-foot library facility to be adequately served. Currently, the Graham Library is a ~~5,145~~ **5,125**-square-foot facility and is deficient by ~~12,549~~ **12,568** square feet.

1-23
(cont.)

In addition, please make the following corrections that are reflected throughout the Public Services section of the DEIR.

- Please use **County of Los Angeles Public Library** not Los Angeles County Public Library.

If you have any questions or need additional information, please feel free to contact Malou Rubio at (562) 940-8450 or mrubio@library.lacounty.gov.

Sincerely,


Yolanda De Ramus
Assistant Director, Administrative Services

YDR:MR:MB:vm

U:\STAFFSERVICES\DEVELOPER\FEE\EIR\Jordan Downs Specific Plan NOA.doc

c: Malou Rubio, Head, Support Services
Robert Seal, Library Administrator, Public Services Administration
Ting Fanti, Head, Budget and Fiscal Services



GAIL FARBER, Director

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
<http://dpw.lacounty.gov>

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE
REFER TO FILE: **LD-1**

December 2, 2010

Mr. Adam Villani, Environmental Review Coordinator
City of Los Angeles Department of City Planning
200 North Spring Street, Room 750
Los Angeles, CA 90012

Dear Mr. Villani:

DRAFT ENVIRONMENTAL IMPACT REPORT JORDAN DOWNS SPECIFIC PLAN CITY OF LOS ANGELES

Thank you for the opportunity to review the Draft Environmental Impact Report for the Jordan Downs Specific Plan. The proposed project includes the demolition and replacement of the existing Jordan Downs public housing complex, the development of 1,800 new dwellings units, and the annexation of 41.72 acres of land from the County of Los Angeles to the City of Los Angeles. The project area is generally bounded by 97th Street to the north, Alameda Street to the east, 103rd Street to the south, and Grape Street to the west, within the jurisdictions of the City of Los Angeles and the unincorporated area of Florence.

The following comments are for your consideration and relate to the environmental document only.

Services--Traffic/Access

1. Mitigation Measure TT1 shall be revised to state the applicant shall be solely responsible for the design and construction of the traffic signal at the intersection of Alameda Street at 97th Street.
2. The applicant shall consult with the County of Los Angeles Department of Regional Planning to obtain a list of related projects administered by the County to be included in the analysis.

3. The Traffic Impact Study shall conduct the level of service analyses at the County and/or County/City intersections using the County's methodology. Using the County's methodology, the project is expected to have a significant impact at the following intersection:

- o Wilmington Avenue at I-105 Eastbound Ramps

If you have any questions regarding traffic comment Nos. 1 through 3, please contact Mr. Isaac Wong at (626) 300-4796 or iswong@dpw.lacounty.gov.

4. Will the 97th Street right of way between Croesus Avenue and Alameda Street be split between City and County, or will the right of way continue to be 100 percent County?

5. Will the 103rd Street right of way become 100 percent City? The portion between the current City/County border and Alameda Street needs to either become 100 percent City or split between the Cities of Los Angeles and Lynwood since there will no longer be any County jurisdiction in this area.

6. Will the City take over all of Alameda Street between 97th and 103rd Street?

If you have any questions regarding traffic comment Nos. 4 through 6, please contact Mr. Dennis Ittner at (562) 869-1176 or dittner@dpw.lacounty.gov.

Hazards-Geotechnical/Soils/Geology

All or portion of the site is located within a potentially liquefiable area per the State of California Seismic Hazard Zones Map-South Gate Quadrangle. Public Works' Geotechnical and Materials Engineering Division reports should be included in the Environmental Impact Report as necessary.

If you have any questions regarding the geotechnical/soils/geology comment, please contact Mr. Jeremy Wan at (626) 458-4925 or jwan@dpw.lacounty.gov.

Mr. Adam Villani
December 2, 2010
Page 3

We request the opportunity to review and comment on future Environmental Impact Reports as they become available. If you have any other questions or require additional information, please contact Mr. Toan Duong at (626) 458-4921 or tduong@dpw.lacounty.gov.

1-24
(cont.)

Very truly yours,

GAIL FARBER
Director of Public Works



for ANTHONY E. NYIVIH
Assistant Deputy Director
Land Development Division

JY:ca

P:\dpub\CEQA\ICDM\ CITY OF LOS ANGELES - JORDAN DOWNS SPECIFIC PLAN_DEIR.doc

cc: Chief Executive Office (Angela Gentry)



Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead



Richard J. Bruckner
Director

December 2, 2010

TO: Dorothea Park, Manager
Office of Unincorporated Area Services
Chief Executive Office

FROM: Jon Sanabria
Chief Deputy

SUBJECT: **DRAFT ENVIRONMENTAL IMPACT REPORT FOR
JORDAN DOWNS SPECIFIC PLAN
STATE CLEARINGHOSUE NO. 2010021007**

Your office requested that the Department of Regional Planning (DRP) review the Draft Environmental Impact Report for the proposed Jordan Downs Specific Plan project proposed by the City of Los Angeles ("City"). My staff has completed the review and provides the following analysis.

1-25

Land Use and Planning

The Specific Plan includes an annexation of approximately 41.72 acres of the unincorporated County land south of East 97th Street in the Florence-Firestone community. This is a logical boundary to maintain physical and neighborhood integrity for the remaining unincorporated Florence-Firestone community. Such annexation will also ensure a more efficient delivery of municipal services to residents, employees, and land owners.

1-26

In our March 25, 2010 letter responding to the Notice of Preparation, we requested that the City evaluate the possibility of retaining some or all of the existing industrial zoning along the Alameda Corridor. The Specific Plan designates these parcels as Commercial Manufacturing (CM), which will be sufficient to accommodate new industrial growth that is more compatible to the residential uses in the immediate vicinity.

1-27

Regional Housing Needs Assessment

The Regional Housing Needs Allocation (RHNA) is an assessment of a local jurisdiction's fair share of the future regional housing need. For Los Angeles County, this assessment is conducted by the Southern California Association of Governments (SCAG). As part of any annexation process, DRP calculates a draft RHNA transfer amount associated with the proposed annexation area using a methodology that attempts to mimic SCAG's RHNA methodology. Using this methodology, DRP calculated a transfer amount of zero units for the Specific Plan.

1-28

Should you and your staff have any questions, please contact Ms. Hsiao-Ching Chen at 4-6559.

JS:hc

Cc: Dan Rosenfeld, Senior Deputy, Second District
Karly Katona, Deputy, Second District



Barry D. Baca, Sheriff

County of Los Angeles
Sheriff's Department Headquarters
4700 Ramona Boulevard
Monterey Park, California 91754-2169



December 2, 2010

Mr. Adam Villani, Environmental Review Coordinator
Los Angeles Department of City Planning
200 North Spring Street, Room 750
Los Angeles, California 90012

Dear Mr. Villani:

RE: JORDAN DOWNS SPECIFIC PLAN PROJECT

The Century Sheriff's Station is tasked with providing law enforcement services for the unincorporated communities of Watts, Florence/Firestone, Athens/Willowbrook and the City of Lynwood. As a result, any proposed projects which have the potential to adversely impact such a large community are of concern to the Los Angeles County Sheriff's Department.

1-29

Should the Jordan Downs Specific Plan Annexation be approved and the population within the Specific Project increase to 1800 residential dwellings as proposed, future law enforcement service levels in the surrounding communities will need to be evaluated.

The Century Sheriff's Station currently provides law enforcement services for the unincorporated territory proposed in the annexation. During the calendar year of 2009, Reporting District (RD) 2177, which contains the Jordan Downs Annexation Area and adjacent Florence/Firestone communities, generated the following calls for service:

- 150 Emergency Calls
- 262 Priority Calls
- 926 Routine Calls

1-30

The average 2009 response time for emergency calls for service in RD 2177 was 4.3 minutes.

The primary concerns with the project, from a law enforcement perspective, are:

- Increased calls for service in surrounding areas as a result of the population increase within the project, resulting in an increased need for traffic and enforcement services;
- Increased vehicular traffic on Alameda Avenue and surrounding residential streets;
- Lack of parking for increased population and existing residents.

1-31

Should you have any questions or concerns, please feel free to contact me at (323) 568-4750.

Sincerely,

LEROY D. BACA, SHERIFF



James J. Hellmold, Captain
Commander, Century Station

LETTER 1

December 29, 2010

William Fujioka, Chief Executive Office
County of Los Angeles Chief Executive Office
Kenneth Hahn Hall of Administration
500 West Temple Street, Room 713
Los Angeles California 90012

Comment 1-1

The County of Los Angeles (County) appreciates the opportunity to review and provide comments on the City of Los Angeles' (City) Draft Environmental Impact Report (DEIR) for the Jordan Downs Specific Plan (Project). The County's comments are submitted on behalf of the following departments:

- Animal Care and Control
- Fire
- Parks and Recreation
- Public Health
- Public Library
- Public Works
- Regional Planning
- Sheriff

Summarized below are the Departments' major concerns/comments related to the DEIR. As this is not a comprehensive summary, please refer to the attached departmental letters for further details.

Response 1-1

The departmental comment letters from the County Departments of Animal Care and Control, Public Works, Fire, and Public Library referenced in this comment were also sent on their own directly to the City of Angeles Department of City Planning and are included as Comment Letter Nos. 2, 3, 4, and 5, respectively. Responses to these County Department comment letters are provided following the individual comment letters. Comment letters from the County Departments of Parks and Recreation, Public Health, Regional Planning, and Sheriff are addressed in responses to this comment letter.

Comment 1-2

Department of Animal Care and Control:

- Given the development of up to 1,800 dwelling units, the Environmental Impact Report (EIR) should address enhanced service level requirements related to the potential for stray animals and animals requiring spay and neuter services.
- The development of multi-purpose design features, such as fencing, is recommended for incorporation into the northeast portion of the Project design. The purpose for this recommendation is to mitigate the propagation of stray animals that may wander into the adjacent unincorporated area as a result of an increase in population at the proposed Project site.

Response 1-2

As this comment only provides a summary of the County Department of Animal Care and Control comments, please refer to the responses to the Department's more detailed comment letter presented in Comments and Responses to 2-1 through 2-3.

Comment 1-3

Fire Department:

- DEIR-Section IV.N-4 (Public Services) – incorrectly identifies staffing at Fire Station 41. Information is provided in the Fire Department's attached letter.
- While the *Health Hazardous Materials Division* has no objection to the proposed Project, properties with historical use or storage of hazardous material on-site may be contaminated. These properties should obtain a "No Further Action Letter" from a local or State agency prior to development of the Project.

Response 1-3

As this comment only provides a summary of the County Fire Department comments, please refer to the responses to the Department's more detailed comment letter presented in Comments and Responses to 4-1 through 4-7.

Comment 1-4

Department of Parks and Recreation:

- In the County's response to the Notice of Preparation (NOP) of an Environmental Impact Report for the Project, DPR suggested a significantly reduced project density and/or inclusion of additional open space acreage to the Project to mitigate the potential adverse impact on the use of County parks. Based on the DEIR, the proposed park acreage, open space, family resource center, gym and pool addresses the recreational needs of the proposed Project.

Response 1-4

As this comment only provides a summary of the County Department of Parks and Recreation comments, please refer to the responses to the Department's more detailed comment letter presented in Comments and Responses to 1-12 through 1-19.

Comment 1-5

Department of Public Health:

- Additional staff resources will be required from the DPH Bureau of District Surveillance and Enforcement for plan check review, construction inspection, public health permitting and routine inspection services for the retail/commercial component of the Project. The EIR should address the additional DPH resource requirements for the Project.

Response 1-5

As this comment only provides a summary of the County Department of Public Health comments, please refer to the responses to the Department's more detailed comment letter presented in Comments and Responses to 1-21 and 1-22.

Comment 1-6

Public Library:

Although the DEIR provides that Housing Authority of the City of Los Angeles shall consult with the Los Angeles Public Library to develop a plan to build a library sub-branch on-site (Mitigation Measure PS10), Public Library specifically states that the population increase from the Project would detrimentally affect the service capacity of the County's Graham Library due to its convenient proximity to the Project area. It is critical that a new Library is built within the Project area.

Response 1-6

As this comment only provides a summary of the County Public Library comments, please refer to the responses to the Department's more detailed comment letter presented in Comments and Responses to 5-1 through 5-3.

Comment 1-7

Department of Public Works (DPW):

- DEIR-Section IV.P (Transportation & Traffic) – The mitigation measure identified as TT1 should be revised to state that the applicant shall be solely responsible for the design and construction of the traffic signal at the intersection of Alameda Street at 97th Street.
- The EIR should analyze adjacent County related projects. A list of related projects administered by the County can be obtained from the County Department of Regional Planning.
- The traffic Impact Study should analyze the level of service at the County and/or County/City intersections using the County's methodology. Based on the County's methodology, the Project is expected to have a significant impact at the intersection of Wilmington Avenue and the I-105 Eastbound Ramps, which needs to be addressed in the EIR.
- The EIR should address whether or not the 97th Street right-of-way will become a City right-of-way. The portion of the right-of-way between the current City/County border and Alameda Street needs to either become 100 percent City or split between the Cities of Los Angeles and Lynwood since there will no longer be any County jurisdiction in this area.
- The EIR should address whether or not the City will assume jurisdiction of all of Alameda Street between 97th and 103rd Streets.
- As all or a portion of the project is located within a potentially liquefiable area per the State of California Seismic Hazard Zones Map – South Gate Triangle, the EIR should include, as necessary, reports from the DPW Geotechnical and Materials Engineering Division.

Response 1-7

As this comment only provides a summary of the County Department of Public Works comments, please refer to the responses to the Department's more detailed comment letter presented in Comments and Responses to 3-1 through 3-9.

Comment 1-8

Department of Regional Planning (DRP):

- Land Use and Planning – the proposed Project and annexation provide a logical boundary to maintain physical and neighborhood integrity for the remaining unincorporated Florence-Firestone community.
- Regional Housing Needs Allocation (RHNA) – The Department has calculated a transfer amount of zero units associates with the proposed annexation of County unincorporated area under the Project using a methodology that attempts to mimic the Southern California Association of Governments RHNA methodology.

Response 1-8

As this comment only provides a summary of the County Department of Regional Planning comments, please refer to the responses to the Department's more detailed comment letter presented in Comments and Responses to 1-25 through 1-28.

Comment 1-9

Sheriff's Department:

Given the potential population increase for the proposed Project, the Sheriff would appreciate an evaluation of future law enforcement service levels to address:

- An increase in calls for service in surrounding areas and a corresponding need to increase traffic and enforcement services;
- An increase in vehicular traffic on Alameda and surrounding streets; and
- A lack of parking for the increased population and existing residents.

Please contact the Sheriff's Department directly to address the above concerns.

The County appreciates the City of Los Angeles addressing the issues raised by the County in the Final EIR. If you have any questions, please contact Dorothea Park at (213) 974-4283, or via e-mail at dpark@ceo.lacounty.gov. If you need clarification regarding specific comments, please contact the respective County department staff identified in the attached letters.

Response 1-9

As this comment only provides a summary of the County Sheriff's Department comments, please refer to the responses to the Department's more detailed comment letter presented in Comments and Responses to 1-19 through 1-31.

Comment 1-10

In reviewing the Draft Environmental Impact Report, it is deemed there would be minimal impact on the County of Los Angeles Department of Animal Care and Control. The impact to the net County cost would not be significant. Our records indicate that over the recent 12-month period, eight animals were impounded from the Project Site and 22 calls for service were handled. Of these 22 calls for service, 15 calls involved two specific addresses and related to similar concerns or requests.

The development of up to 1,800 new dwelling units at the overall Project Site could increase the propensity for stray animals in the general vicinity. The City of Los Angeles Animal Services would be responsible for animal control services within the entire Project Site subsequent to annexation of the required unincorporated parcels.

In effort to deter animals from straying from the northeast portion of the Project Site into the adjacent unincorporated community, multi-purpose design features such as fencing could be incorporated into the project. Such features would not only deter the propagation of stray animals but could provide benefits related to the general safety of residents.

If you have any questions or need additional information, please contact Patrick Malekian at (562) 256-2400.

Response 1-10

This comment letter was also sent directly to the City of Los Angeles Department of City Planning and is presented in this chapter as Comment Letter No. 2. Please refer to Comments and Responses 2-1 through 2-3 for responses to the County Department of Animal Care and Control's comments.

Comment 1-11

The Notice of Availability of a Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

PLANNING DIVISION:

Public Services

1. Paragraph three should be corrected to state, "Fire Station 41 is located approximately 1.5 miles south of the annexation area. Fire Station 41 has a daily staff of six who have the following assignments: one Captain, one Fire Fighter Specialist, one Fire/Paramedic and one Fire Fighter assigned to a four-person assessment engine company and; two Fire Fighter/Paramedics assigned to a two-person paramedic squad."

LAND DEVELOPMENT UNIT:

1. This project is located entirely in the City of Los Angeles. Therefore, the City of Los Angeles Fire Department has jurisdiction concerning this project and will be setting conditions. This project is located in close proximity to the jurisdictional area of the Los Angeles County Fire Department.
2. This project does not propose construction of structures or any other improvements at this time. Therefore, until actual construction is proposed, the project will not have a significant impact to the Fire Department, Land Development Unit.
3. The statutory responsibilities of the County of Los Angeles Fire Department, Land Development Unit, are the review of, and comment on, all projects within the unincorporated areas of the County of Los Angeles. Our emphasis is on the availability of sufficient water supplies for fire fighting operations and local/regional access issues. However, we review all projects for issues that may have a significant impact on the County of Los Angeles Fire Department. We are responsible for the review of all projects within Contract Cities (Cities that contract with the County of Los Angeles Fire Department for fire protection services).

We are responsible for all County facilities located within non-contract Cities. The County of Los Angeles Fire Department, Land Development Unit may also comment on condition that may be imposed on a project by the Fire Prevention Division, which may create a potentially significant impact to the environment.

4. Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department, Land Development Unit's Inspector, Claudia Soiza, at (323) 890-4243.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

1. The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archaeological and cultural resources, and the County Oak Tree Ordinance.
2. The areas germane to the statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division have been addressed.

HEALTH HAZARDOUS MATERIAL DIVISION:

1. The Health Hazardous Materials Division has no objection to the proposed project. However, it should be noted that properties with historical use or storage of hazardous materials onsite may be contaminated. These properties should obtain a "No Further Action Letter" from a local or State Agency prior to redevelopment.

If you have any additional questions, please contact this office at (323) 890-4330.

Response 1-11

This comment letter was also sent directly to the City of Los Angeles Department of City Planning and is presented in this chapter as Comment Letter No. 4. Please refer to Comments and Responses 4-1 through 4-4 for responses to the County Fire Department's comments.

Comment 1-12

The Draft EIR for the subject project has been reviewed for potential impacts on the facilities of the Department of Park and Recreation (DPR) for which we offer the following comments.

Response 1-12

This comment is noted. No response to this comment is necessary as it only contains introductory information and is not a specific comment on the environmental analysis in Draft EIR.

Comment 1-13

Page IV. O-1

The description of County parks under "Environmental Setting" should be consistent with the Park Classifications from the draft Parks and Recreation (DPR) Element of the County of Los Angeles General Plan (see attachment).

Response 1-13

Consistent with this comment, additional information regarding the County Park classifications has been added to the Environmental Setting discussion in Section IV.O Recreation of the Draft EIR. Please refer to Chapter III Corrections and Additions of this Final EIR.

Comment 1-14

Page IV O-2, Figure IV. O-1

Under County parks, #2 should be Walnut Nature ~~Pocket~~ Park and #7 should be Earvin “Magic” Johnson Recreation ~~Center~~ Area.

Page IV. O-3, Table IV. O-1

Walnut Nature pocket park should be Walnut Nature Park.

Response 1-14

These corrections have been made to Figure IV.O-1 and Table IV.O-1 in Section IV.O Recreation of the Draft EIR. Please refer to Chapter III Corrections and Additions in this Final EIR.

Comment 1-15

Page IV. O-4, 1st Paragraph

Florence Firestone does not currently have a community plan, although one will be prepared next year. At this time, any reference to the Florence-Firestone Community Plan area (CPA) should be changed to the Florence-Firestone Park Planning Area (PPA).

Page IV. O-4, Footnote 5

CPA should be changed to PPA.

Response 1-15

These corrections have been made to Section IV.O Recreation of the Draft EIR. Please refer to Chapter III Corrections and Additions in this Final EIR.

Comment 1-16

Page IV. O-4, Footnote 6

Please add as indicated, “Draft Florence-Firestone Community Parks and Recreation Plan.”

Response 1-16

This correction has been made to Section IV.O Recreation of the Draft EIR. Please refer to Chapter III Corrections and Additions in this Final EIR.

Comment 1-17

Page IV. O-5

Under “County of Los Angeles, Conservation and Open Space Element”, the standards for the provision of parkland should be clarified as follows: four (4) acres of local parkland per 1,000 residents of the population in the County’s unincorporated areas and six (6) acres of regional parkland per 1,000 residents of the County’s total population. Please also note that the County is in the process of updating its General Plan. This update will include a separate Parks and Recreation Element.

Response 1-17

This clarification has been made to Section IV.O Recreation of the Draft EIR. Please refer to Chapter III Corrections and Additions in this Final EIR.

Comment 1-18

Page IV. O-4, Footnote 10

Region should be Regional (Department of Regional Planning).

Response 1-18

This correction has been made to Section IV.O Recreation of the Draft EIR. Please refer to Chapter III Corrections and Additions in this Final EIR.

Comment 1-19

Page IV. O-6 and 7

The Draft EIR describes the development of a 6.38 acre park, 2.57 acres of additional open space, and another 2.41 acres developed within a 50,000 square foot family resource center, a 17,000 square foot joint use gym and a 3,000 square foot pool facility. The resulting 11.36 acres of land for park and recreation facilities along with the estimated \$40 million (land and construction costs) addresses the recreational needs of the proposed project.

Thank you for including this Department in the review process. If we may be of further assistance, please contact Julie Yom at (213) 351-5127 or jyom@parks.lacounty.gov.

Response 1-19

This comment reiterates information included in the Draft EIR, and concludes that the proposed parkland and recreational facilities meet the recreational needs of the proposed project. This comment is noted and will be provided to the decision-makers for consideration.

Comment 1-20

The County standard for the provision of parkland is four (4) acres of local parkland per 1,000 residents of the population in the County's unincorporated areas, and six (6) acres of regional parkland per 1,000 residents of the County's total population.

The County offers a wide variety of parks and recreation resources. These facilities generally fall under two systems: local system and regional system.

Local System

The local system consists of parks of varying sizes that meet local needs and offer opportunities for daily recreation. This system includes community parks, neighborhood parks, pocket parks, and open space nodes, and is summarized in Table 7.2.

- **Community Parks:** Community parks are typically 10-20 acres, and serve several neighborhoods within a 1 to 2 miles radius of the park. Where community parks are located in residential neighborhoods, they serve both the needs of the community park service radius and neighborhood park service radius. Community parks serve a wide variety of active and passive recreation activities communitywide. The amenities programmed into a community park are focused on meeting the needs of several neighborhoods or large sections of the community. They allow for group activities and recreational opportunities that may not be feasible in neighborhood parks. Amenities for community parks can include informal open play areas, children's play apparatus, family and group picnic areas with overhead shelters, barbecues, lighted sports fields,

basketball courts and tennis courts, public restrooms, concession building, maintenance building, onsite parking and information kiosks.

- Neighborhood Parks:** Neighborhood parks are typically 3-10 acres, and serve residents living within a half-mile radius of the park. Neighborhood parks provide space and recreation activities to create healthy social networks within residential communities via programs and facilities. The common objective of all neighborhood parks is to bring people together to recreate and socialize close to home. Ease of access and walking distance uninterrupted by major roads and other physical barriers are important factors in locating neighborhood parks. Neighborhood parks should be well connected to other public facilities such as schools and libraries. Amenities for neighborhood parks can include informal open play areas, children's play apparatus, picnic tables, picnic shelters, barbecues, practice sports fields, basketball, tennis and volleyball courts, public restrooms, information kiosks, recreation offices, and onsite parking.
- Pocket Parks:** Pocket parks are less than three acres in size, and serve residential or business areas within a quarter-mile radius or within a walking distance. They are best used to meet limited or specialized recreational needs. Pocket parks can provide landscaped public use areas in industrial and commercial areas, scenic overlooks, linkage to a community pathway system, and urban infill sites in park-poor communities. Pocket parks generally do not have on-site parking. Amenities for pocket parks can include both active and passive features, depending on the community's setting and needs, such as children's play apparatus, picnic areas, fountains and seating areas. Due to the limited amenities included in pocket parks, they are typically not included in the service radius analysis.
- Park Nodes:** Park nodes are small pieces of open space that serve as public destinations, connections, and community defining spaces. Nodes provide physical and visual breaks to the urban landscape and connect various spaces, such as waterways, streets, trails, and greenways. Park nodes are used as gathering and rest areas, and serve as opportunities for social and cultural exchange. Examples of park nodes include equestrian and hiking trail heads, bike rest stops and stations with lockers and repair areas, neighborhood focal points, and passive amenities such as plazas, rest areas, playgrounds, landmarks, and public art installations.

Table 7.2: Local Park System Summary

Facility	Typical Park Features and Amenities
<p>Community Park</p> <p>Acres Per Thousand</p> <p>Population:4 / 1,000</p> <p>Suggested Acreage:10-20 acres</p> <p>Service Area:1-2 mile</p>	<p>Passive Park Amenities including but not limited to: informal open play areas, children's play apparatus, family and group picnic areas with overhead shelters, barbecues.</p> <p>Active Sports Activities including but not limited to: lighted sports fields, basketball courts and tennis courts. Additional amenities may include aquatics complex, skate park, arena soccer, roller hockey, community gardens, and dog parks.</p> <p>Park Facilities including but not limited to: public restrooms, concession building, community buildings, maintenance building and on-site parking and informational kiosk</p>

<p>Neighborhood Park Acres Per Thousand Population:4 / 1,000 Suggested Acreage:3-10 acres Service Area:1-2 mile</p>	<p>Passive Park Amenities including but not limited to: informal open play areas, children's play apparatus, family picnic areas with overhead shelters, barbecues. Active Park Amenities including but not limited to: practice sports fields, basketball, tennis, and volleyball courts. Park Facilities including but not limited to: public restroom, on-site parking and informational kiosks.</p>
<p>Pocket Park Acres Per Thousand Population:4 / 1,000 Suggested Acreage: less than 3 acres Service Area:1/4 mile</p>	<p>Passive Park Amenities including but not limited to: picnic areas and seating areas Active Park Amenities including but not limited to: children's play apparatus</p>
<p>Park Node Acres Per Thousand Population: 4 / 1,000 Service Area: no service radius area</p>	<p>Varies, can include: plazas, rest areas, playgrounds, landmarks and public art installations</p>

Regional System

The regional system is intended to meet the park and recreation needs of residents and visitors throughout the County. This system consists of community regional parks, regional parks, and special use facilities, and is summarized in Table 7.3.

- **Community Regional Parks:** Neighborhood parks are typically 20-100 acres, and have a service radius of 20 miles. Community regional parks protect natural resources, preserve open spaces, and provide recreational facilities that are not available in neighborhood or community parks. Amenities for community regional parks can include a jogging exercise course, informal open play areas, children's play apparatus, family and group picnic areas with overhead shelters, barbecues, lighted sports fields, basketball courts and tennis courts, information kiosks, public restrooms, concession building, recreation offices, maintenance buildings, and on-site parking. Community regional parks may also have one or more of the following features: multiple sports facilities, aquatics center, fishing lake, community building and gymnasium, and outstanding views and vistas.
- **Regional Parks:** Regional parks are typically greater than 100 acres in size, and have a service radius of 25 miles or more. They include unique areas such as lakes, wetlands, auditoriums, water bodies, and campgrounds, in addition to active recreational facilities often offered in community and community regional parks. Many of the recreation activities are associated with experiencing the natural environment. A regional park may also perform important ecological and environmental functions, including serving as wildlife habitats. The connection of these parks to natural areas is often vital to ensuring a healthy ecological system. Amenities for regional parks can include: picnic areas, nature centers, trail systems, scenic drives, campgrounds, water areas for swimming, fishing and boating, and in some cases, sport fields.
- **Special Use Facilities:** Special use facilities are generally single purpose facilities that serve the greater regional recreational or cultural needs in the County. One notable example of such a

facility is the Hollywood Bowl. Special use facilities require adequate public access and sufficient buffers to protect adjacent residential users and to insulate the park from commercial or industrial development. Special use facilities can provide both passive (e.g. historic and cultural facilities, natural areas, habitat preservation areas, arboreta and botanical gardens, and nature centers) and active (e.g. golf courses and driving ranges, equestrian centers, off-highway vehicle (OHV) parks, water parks or aquatic facilities, and skate parks) needs within the region. There are no size criteria or service area associated with special use facilities.

Table 7.3: Regional Park System Summary

Facility	Typical Park Features and Amenities
<p>Community Regional Park</p> <p>Acres Per Thousand Population: 6/ 1,000</p> <p>Suggested Acreage: 20-100 acres</p> <p>Service Area: up to 20 miles</p>	<p>Passive Park Amenities including but not limited to: informal open play areas, children's play apparatus, family and group picnic areas with overhead shelters, barbecues.</p> <p>Active Sports Activities including but not limited to: lighted sports fields, basketball courts and tennis courts.</p> <p>Additional amenities may include one or more of the following features: multiple sports facilities, aquatics center, fishing lake, community building and gymnasium, and outstanding views and vistas.</p> <p>Park Facilities including but not limited to: public restrooms, concession building, community buildings, maintenance building and on-site parking and informational kiosks.</p>
<p>Regional Park</p> <p>Acres Per Thousand Population: 6/ 1,000</p> <p>Suggested Acreage: greater than 100 acres</p> <p>Service Area: 25+ acres</p>	<p>Passive Park Amenities including but not limited to: group picnic areas with overhead shelters, barbecues.</p> <p>Additional amenities may include one or more of the following features: lakes, wetlands, auditoriums, water bodies for swimming, fishing and boating, and sports fields.</p>
<p>Special Use Facility</p> <p>Acres Per Thousand Population: 6/ 1,000</p> <p>Suggested Acreage: no size criteria</p> <p>Service Area: no assigned service radius area</p>	<p>Generally single purpose facilities. Can include passive features such as: wilderness parks, nature preserves, botanical gardens and nature centers.</p> <p>Active uses can include: performing arts, water parks, aquatic facilities, skate parks, golf driving ranges and golf courses.</p>

Response 1-20

This comment is the Attachment referenced in Comment 1-13. Additional information regarding the County Park Classifications has been added to the Environmental Setting discussion in Section IV.O Recreation of the Draft EIR. Please refer to Chapter III Corrections and Additions of this Final EIR.

Comment 1-21

The Department of Public Health - Environmental Health Division has reviewed the Draft Environmental Impact Report (DEIR) for the project identified above. The project includes the implementation of the Specific Plan to redevelop the Jordan Downs public housing complex and transform the Specific Plan area into a mixed-use development to include new homes, schools, parks, and community facilities.

Response 1-21

No response to this comment is necessary as it only contains introductory information and is not a specific comment on the environmental analysis in Draft EIR.

Comment 1-22

After reviewing the DEIR, we anticipate that there will be impacts on the services provided by the Department's Bureau of District Surveillance and Enforcement. The retail/commercial component of the specific plan will require additional services, such as plan check review, construction inspection, public health permitting, and routine inspections. Such services will require additional staff time and resources to accomplish.

If you should have any regarding the above comments, please feel free to contact me at (626) 430-5200.

Response 1-22

While the proposed retail and commercial uses within the Specific Plan area may require health permits to operate, the County of Los Angeles Department of Public Health has established plan check review and inspection fees that these business would be required to pay. Therefore, it is anticipated that payment of such fees would address the Bureau of District Surveillance and Enforcement's concerns regarding the need for additional services, staff time and resources.

Comment 1-23

This is to provide you with written comments on the Notice of Availability of a Draft Environmental Impact Report (DEIR) for the above referenced project. In summary, the Jordan Downs Specific Plan involves the development of 1,800 residential units. While the majority of the Specific Plan area is within the City of Los Angeles (City), approximately 41.74 acres are within the unincorporated areas of the County of Los Angeles (County). The Specific Plan also involves the annexation of the unincorporated areas to the City.

The existing residents of the unincorporated areas are currently served by the County's Graham Library. However, as indicated in the DEIR and in the County Library's previous comments, the City of Los Angeles will be responsible to provide library services to all project residents, if the proposed annexation is approved.

It is critical that a new library is built within the Specific Plan area. According to the DEIR, the City's existing Watts Branch Library, which currently serves the City portion of the Specific Plan area, does not meet the City's branch library facility size standards and the City does not have any plans to expand the Watts Branch Library or construct a new facility within the vicinity of the Watts community. Without an on-site library facility within the Specific Plan area, the population increase from the Project would detrimentally affect the service capacity of the County's Graham Library due to its convenient proximity to the Specific Plan area. The Graham Library is already inadequate to effectively serve the existing residents of its service area.

Other Comments/Corrections on the County Library's Section:

The proposed deletions and insertions are indicated in bold font.

Page IV.N-15 - Public Services - County of Los Angeles Public Library

The LACPL system comprises ~~8886~~ community libraries **and 4 bookmobiles** throughout Los Angeles County. The Annexation Area is within the service area of the LAPL Graham Library (Figure IV.N-5). The Graham Library is located approximately 0.80 miles northwest of the Specific Plan area at 1900 East Firestone Boulevard. The Graham Library is a ~~5,145~~ **5,125** square-foot facility that houses a collection of ~~59,831~~ **44,554 materials which includes** books, ~~4837~~ audio recordings, and ~~71~~ magazine and newspaper subscriptions.⁴⁴ The Graham Public Library has an estimated service population of 35,387.^{42, 43}

To determine the adequate level of service required for a population served by a LACPL branch community library, the LACPL utilizes a materials-to-resident ratio and a facility square footage-to-resident ratio. The LACPL materials-to-residents ratio is 2.75 materials to one resident.⁴⁵ Based upon the LACPL materials-to-resident ratio, the Graham Library service population would require 97,314 materials to be adequately served. Currently, the Graham Library has ~~64,739~~ **44,554** materials and is deficient by ~~32,575~~ **52,760** materials. The LACPL facility square footage-to-resident ratio is 0.5 square foot to one resident's. Based upon the LACPL facility square footage-to-resident ratio, the service population of the Graham Library requires a ~~17,693~~ **17,694**-square -foot library facility to be adequately served. Currently, the Graham Library is a ~~5,145~~ **5,125**-square-foot facility and is deficient by ~~12,549~~ **12,568** square feet.

In addition, please make the following corrections that are reflected throughout the Public Services section of the DEIR.

- Please use **County of Los Angeles Public Library** not Los Angeles County Public Library.

If you have any questions or need additional information, please feel free to contact Malou Rubio at (562) 940-8450 or mrubio@library.lacounty.gov.

Response 1-23

This comment letter was also sent directly to the City of Los Angeles Department of City Planning and is presented in this section as Comment Letter No. 5. Please refer to Comments and Responses 5-1 through 5-3 for responses to the County of Los Angeles Public Library's comments.

Comment 1-24

Thank you for the opportunity to review the Draft Environmental Impact Report for the Jordan Downs Specific Plan. The proposed project includes the demolition and replacement of the existing Jordan Downs public housing complex, the development of 1,800 new dwellings units, and the annexation of 41.72 acres of land from the County of Los Angeles to the City of Los Angeles. The project area is generally bounded by 97th Street to the north, Alameda Street to the east, 103rd Street to the south, and Grape Street to the west, within the jurisdictions of the City of Los Angeles and the unincorporated area of Florence.

The following comments are for your consideration and relate to the environmental document only.

Services-Traffic/Access

1. Mitigation Measure TT1 shall be revised to state the applicant shall be solely responsible for the design and construction of the traffic signal at the intersection of Alameda Street at 97th Street.
2. The applicant shall consult with the County of Los Angeles Department of Regional Planning to obtain a list of related projects administered by the County to be included in the analysis.

3. The Traffic Impact Study shall conduct the level of service analyses at the County and/or County/City intersections using the County's methodology. Using the County's methodology, the project is expected to have a significant impact at the following intersection:
 - o Wilmington Avenue at 1-105 Eastbound Ramps

If you have any questions regarding traffic comment Nos. 1 through 3, please contact Mr. Isaac Wong at (626) 300-4796 or iswong@dpw.lacounty.gov.

4. Will the 97th Street right of way between Croesus Avenue and Alameda Street be split between City and County, or will the right of way continue to be 100 percent County?
5. Will the 103rd Street right of way become 100 percent City? The portion between the current City/County border and Alameda Street needs to either become 100 percent City or split between the Cities of Los Angeles and Lynwood since there will no longer be any County jurisdiction in this area.
6. Will the City take over all of Alameda Street between 97th and 103rd Street?

If you have any questions regarding traffic comment Nos. 4 through 6, please contact Mr. Dennis Ittner at (562) 869-1176 or dittner@dpw.lacounty.gov.

Hazards-Geotechnical Soils/Geology

All or portion of the site is located within a potentially liquefiable area per the State of California Seismic Hazard Zones Map-South Gate Quadrangle. Public Works' Geotechnical and Materials Engineering Division reports should be included in the Environmental Impact Report as necessary.

If you have any questions regarding the geotechnical/soils/geology comment, please contact Mr. Jeremy Wan at (626) 458-4925 or jwan@dpw.lacounty.gov.

We request the opportunity to review and comment on future Environmental Impact Reports as they become available. If you have any other questions or require additional information, please contact Mr. Toan Duong at (626) 458-4921 or tduong@dpw.lacounty.gov.

Response 1-24

This comment letter was also sent directly to the City of Los Angeles Department of City Planning and is presented in this chapter as Comment Letter No. 3. Please refer to Comments and Responses 3-1 through 3-9 for responses to the County Department of Public Works' comments.

Comment 1-25

Your office requested that the Department of Regional Planning (DRP) review the Draft Environmental Impact Report for the proposed Jordan Downs Specific Plan project proposed by the City of Los Angeles ("City"). My staff has completed the review and provides the following analysis.

Response 1-25

No response to this comment is necessary as it only contains introductory information and is not a specific comment on the environmental analysis in the Draft EIR.

Comment 1-26

Land Use and Planning

The Specific Plan includes an annexation of approximately 41.72 acres of the unincorporated County land south of East 97th Street in the Florence-Firestone community. This is a logical boundary to maintain physical and neighborhood integrity for the remaining unincorporated Florence-Firestone community. Such annexation will also ensure a more efficient delivery of municipal services to residents, employees, and land owners.

Response 1-26

This comment reiterates information included in the Draft EIR, and concludes that the proposed annexation creates a logical boundary. This comment is noted and will be provided to the decision-makers for consideration. No further response to this comment is necessary as it is not a specific comment on the environmental analysis in the Draft EIR.

Comment 1-27

In our March 25, 2010 letter responding to the Notice of Preparation, we requested that the City evaluate the possibility of retaining some or all of the existing industrial zoning along the Alameda Corridor. The Specific Plan designates these parcels as Commercial Manufacturing (CM), which will be sufficient to accommodate new industrial growth that is more compatible to the residential uses in the immediate vicinity.

Response 1-27

This comment indicates that the proposed Commercial Manufacturing (CM) zoning designation for the existing industrial zoned parcels along the Alameda Corridor is sufficient to accommodate new industrial growth and is more compatible with the residential uses in the immediate vicinity. This comment is noted and will be provided to the decision-makers for consideration.

Comment 1-28

Regional Housing Needs Assessment

The Regional Housing Needs Allocation (RHNA) is an assessment of a local jurisdiction's fair share of the future regional housing need. For Los Angeles County, this assessment is conducted by the Southern California Association of Governments (SCAG). As part of any annexation process, DRP calculates a draft RHNA transfer amount associated with the proposed annexation area using a methodology that attempts to mimic SCAG's RHNA methodology. Using this methodology, DRP calculated a transfer amount of zero units for the Specific Plan.

Should you and your staff have any questions, please contact Ms. Hsiao-Ching Chen at 4-6559.

Response 1-28

This comment indicates that the County Department of Regional Planning has calculated a draft Regional Housing Needs Assessment (RHNA) associated with the proposed annexation area and determined a transfer amount of zero units. This comment is noted and will be provided to the decision-makers for consideration. No further response to this comment is necessary as it is not a specific comment on the environmental analysis in the Draft EIR.

Comment 1-29

The Century Sheriff's Station is tasked with providing law enforcement services for the unincorporated communities of Watts, Florence/Firestone, Athens/Willowbrook and the City of Lynwood. As a result, any proposed projects which have the potential to adversely impact such a large community are of concern to the Los Angeles County Sheriff's Department.

Should the Jordan Downs Specific Plan Annexation be approved and the population within the Specific Project increase to 1800 residential dwellings as proposed, future law enforcement service levels in the surrounding communities will need to be evaluated.

Response 1-29

This comment indicates that the Century Sheriff Station provides law enforcement services to the unincorporated communities of Watts, Florence/Firestone, Athens/Willowbrook, and the City of Lynwood and that if the proposed project is approved future law enforcement services levels in the surrounding communities will need to be evaluated. This comment is noted and will be provided to the decision-makers for consideration. An analysis of impacts related to police protection services is included in Section IV.N Public Services in the Draft EIR. The analysis concluded that upon implementation of Mitigation Measures **PS4** through **PS8**, impacts related to police protection services would be less than significant.

Comment 1-30

The Century Sheriff's Station currently provides law enforcement services for the unincorporated territory proposed in the annexation. During the calendar year of 2009, Reporting District (RD) 2177, which contains the Jordan Downs Annexation Area and adjacent Florence/Firestone communities, generated the following calls for service:

- 150 Emergency Calls
- 262 Priority Calls
- 926 Routine Calls

The average 2009 response time for emergency calls for service in RD 2177 was 4.3 minutes.

Response 1-30

This information has been added to Section IV.N Public Services in the Draft EIR. Please refer to Chapter III Corrections and Additions in this Final EIR.

Comment 1-31

The primary concerns with the project, from a law enforcement perspective, are:

- Increased calls for service in surrounding areas as a result of the population increase within the project, resulting in an increased need for traffic and enforcement services;
- Increased vehicular traffic on Alameda Avenue and surrounding residential streets;
- Lack of parking for increased population and existing residents.

Should you have any questions or concerns, please feel free to contact me at (323) 568-4750.

Response 1-31

Mitigation Measures **PS4** through **PS7** are crime prevention measures that would be implemented to reduce the demand for police protection services. In addition, Mitigation Measure **PS8** requires that HACLA consult with the LAPD to develop a plan to build a police station or sub-station on-site to ensure that the increase in residential, employment, recreational, and commercial activity within the Specific Plan area would have a less-than-significant impact on police protection services. Traffic mitigation measures have also been incorporated to ensure that the increased vehicle traffic on Alameda Street and surrounding residential streets is managed appropriately. The proposed project would employ a variety of parking strategies in accordance with the parking requirements as prescribed in the Specific Plan. Parking requirements for the residential uses range from 1 to 1.5 parking spaces per unit, based on the number of bedrooms. Non-residential uses would have similar parking requirements under the Specific Plan as under the Los Angeles Municipal Code (LAMC). In total, the Specific Plan would require a total of 3,231 parking spaces for all uses. The Draft EIR concluded that less-than-significant impacts related to parking would occur. See Section IV.P Transportation and Traffic of the Draft EIR.



Marcia Mayeda
Director

Letter No. 2
County of Los Angeles
Department of Animal Care and Control
Administrative Office
5898 Cherry Avenue
Long Beach, California 90805
(562) 728-4610 • Fax (562) 422-3478
<http://animalcare.lacounty.gov>



December 8, 2010

RECEIVED
CITY OF LOS ANGELES

DEC 14 2010

ENVIRONMENTAL
UNIT

Shelter Locations

Downey Shelter
11258 S. Garfield Ave.
Downey, CA 90242
(562) 940-6898

Carson Shelter
216 W. Victoria St.
Gardena, CA 90248
(310) 523-9566

Baldwin Park Shelter
4275 N. Elton St.
Baldwin Park, CA 91706
(626) 962-3577

Lancaster Shelter
5210 W. Avenue I
Lancaster, CA 93536
(661) 940-4191

Castaic Shelter
31044 N. Charlie Cyn.
Road
Castaic, CA 91384
(661) 257-3191

Agoura Shelter
29525 Agoura Rd.
Agoura, CA 91301
(818) 991-0071

Major Case Unit
11258 S. Garfield Ave.
Downey, CA 90242
(562) 658-2000

Mr. Adam Villani, Environmental Review Coordinator
Department of City Planning
City of Los Angeles
200 North Spring Street, Room 750
Los Angeles, CA 90012-4801

Dear Mr. Villani:

JORDAN DOWNS SPECIFIC PLAN NOTICE OF PREPARATION

In reviewing the Draft Environmental Impact Report, it is deemed there would be minimal impact on the County of Los Angeles Department of Animal Care and Control. The impact to net County cost would not be significant. Our records indicate that over the recent 12-month period, eight animals were impounded from the Project Site and 22 calls for service were handled. Of these 22 calls for service, 15 calls involved two specific addresses and related to similar concerns or requests.

2-1

The development of up to 1,800 new dwelling units at the overall Project Site could increase the propensity for stray animals in the general vicinity. The City of Los Angeles Animal Services would be responsible for animal control services within the entire Project Site subsequent to annexation of the required unincorporated parcels.

2-2

In an effort to deter animals from straying from the northeast portion of the Project Site into the adjacent unincorporated community, multi-purpose design features such as fencing could be incorporated into the project. Such features would not only deter the propagation of stray animals but could provide benefits related to the general safety of residents.

2-3

If you have any questions or need additional information, please contact Patrick Malekian at (562) 256-2400.

Sincerely,

David Dijkstra
Chief Deputy Director

DD:PM:jl

c: Dorothea Park, Chief Executive Office

LETTER 2

December 8, 2010

David Dijkstra, Chief Deputy Director
County of Los Angeles
Department of Animal Care and Control
Administrative Office

Comment 2-1

In reviewing the Draft Environmental Impact Report, it is deemed there would be minimal impact on the County of Los Angeles Department of Animal Care and Control. The impact to net County cost would not be significant. Our records indicate that over the recent 12-month period, eight animals were impounded from the Project Site and 22 calls for service were handled. Of these 22 calls for service, 15 calls involved two specific addresses and related to similar concerns or requests.

Response 2-1

This indicates that the proposed project would have a minimal impact to the County Department of Animal Care and Control and states that the net cost to the County would be less than significant. This comment is noted and will be provided to the decision-makers for consideration. No further response to this comment is necessary as it is not a specific comment on the environmental analysis in the Draft EIR.

Comment 2-2

The development of up to 1,800 new dwelling units at the overall Project Site could increase the propensity for stray animals in the general vicinity. The City of Los Angeles Animal Services would be responsible for animal control services within the entire Project Site subsequent to annexation of the required unincorporated parcels.

Response 2-2

This comment indicates that the proposed project could increase the propensity for stray animals, and the City of Los Angeles would be responsible for animal control services within the entire project site subsequent to the annexation of the unincorporated parcels. In accordance with HACLA's pet policy, only senior and disabled residents are allowed to own dogs or cats,¹ thus reducing the likelihood that many pets that are found stray in the project site could come from the Jordan Downs housing units. As the project site is not fenced, stray pets from surrounding neighborhoods could represent a significant proportion of the strays picked up by Animal Control. Unauthorized dogs are an issue of great concern to the HACLA, especially if aggressive dogs are brought into their developments. HACLA will continue to work with the residents to enforce its policies regarding pet ownership to minimize the contribution of stray animals on the property. No further response to this comment is necessary as it is not a specific comment on the environmental analysis in the Draft EIR.

¹HACLA, *Housing Authority of the City of Los Angeles Year 2010 Agency Plan*, October 1 2009.

Comment 2-3

In an effort to deter animals from straying from the northeast portion of the Project Site into the adjacent unincorporated community, multi-purpose design features such as fencing could be incorporated into the project. Such features would not only deter the propagation of stray animals but could provide benefits related to the general safety of residents.

If you have any questions or need additional information, please contact Patrick Malekian at (562) 256-2400.

Response 2-3

This comment suggests that design features such as fencing could be incorporated into project design to deter animals from straying from the project site. The comment further indicates that such design features could provide general safety benefits to the residents. This comment is noted and will be provided to the decision-makers for consideration. No further response to this comment is necessary as it is not a specific comment on the environmental analysis in the Draft EIR.



GAIL FARBER, Director

Letter No. 3
COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
<http://dpw.lacounty.gov>

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE
REFER TO FILE: **LD-1**

December 2, 2010

Mr. Adam Villani, Environmental Review Coordinator
City of Los Angeles Department of City Planning
200 North Spring Street, Room 750
Los Angeles, CA 90012

Dear Mr. Villani:

DRAFT ENVIRONMENTAL IMPACT REPORT
JORDAN DOWNS SPECIFIC PLAN
CITY OF LOS ANGELES

Thank you for the opportunity to review the Draft Environmental Impact Report for the Jordan Downs Specific Plan. The proposed project includes the demolition and replacement of the existing Jordan Downs public housing complex, the development of 1,800 new dwellings units, and the annexation of 41.72 acres of land from the County of Los Angeles to the City of Los Angeles. The project area is generally bounded by 97th Street to the north, Alameda Street to the east, 103rd Street to the south, and Grape Street to the west, within the jurisdictions of the City of Los Angeles and the unincorporated area of Florence.

3-1

The following comments are for your consideration and relate to the environmental document only.

Services-Traffic/Access

1. Mitigation Measure TT1 shall be revised to state the applicant shall be solely responsible for the design and construction of the traffic signal at the intersection of Alameda Street at 97th Street.
2. The applicant shall consult with the County of Los Angeles Department of Regional Planning to obtain a list of related projects administered by the County to be included in the analysis.

3-2

3-3

3. The Traffic Impact Study shall conduct the level of service analyses at the County and/or County/City intersections using the County's methodology. Using the County's methodology, the project is expected to have a significant impact at the following intersection:

3-4

- o Wilmington Avenue at I-105 Eastbound Ramps

If you have any questions regarding traffic comment Nos. 1 through 3, please contact Mr. Isaac Wong at (626) 300-4796 or iswong@dpw.lacounty.gov.

4. Will the 97th Street right of way between Croesus Avenue and Alameda Street be split between City and County, or will the right of way continue to be 100 percent County?

3-5

5. Will the 103rd Street right of way become 100 percent City? The portion between the current City/County border and Alameda Street needs to either become 100 percent City or split between the Cities of Los Angeles and Lynwood since there will no longer be any County jurisdiction in this area.

3-6

6. Will the City take over all of Alameda Street between 97th and 103rd Street?

If you have any questions regarding traffic comment Nos. 4 through 6, please contact Mr. Dennis Ittner at (562) 869-1176 or dittner@dpw.lacounty.gov.

3-7

Hazards–Geotechnical/Soils/Geology

All or portion of the site is located within a potentially liquefiable area per the State of California Seismic Hazard Zones Map–South Gate Quadrangle. Public Works' Geotechnical and Materials Engineering Division reports should be included in the Environmental Impact Report as necessary.

3-8

If you have any questions regarding the geotechnical/soils/geology comment, please contact Mr. Jeremy Wan at (626) 458-4925 or jwan@dpw.lacounty.gov.

Mr. Adam Villani
December 2, 2010
Page 3

We request the opportunity to review and comment on future Environmental Impact Reports as they become available. If you have any other questions or require additional information, please contact Mr. Toan Duong at (626) 458-4921 or tduong@dpw.lacounty.gov.

3-9

Very truly yours,

GAIL FARBER
Director of Public Works



for ANTHONY E. NYIVIH
Assistant Deputy Director
Land Development Division

JY:ca

P:\ldpubl\CEQA\ICDM\ CITY OF LOS ANGELES - JORDAN DOWNS SPECIFIC PLAN_DEIR.doc

cc: Chief Executive Office (Angela Gentry)

LETTER 3

December 2, 2010

Gail Farber, Director
County of Los Angeles
Department of Public Works
900 South Fremont Avenue
Alhambra, CA 91803

Comment 3-1

Thank you for the opportunity to review the Draft Environmental Impact Report for the Jordan Downs Specific Plan. The proposed project includes the demolition and replacement of the existing Jordan Downs public housing complex, the development of 1,800 new dwellings units, and the annexation of 41.72 acres of land from the County of Los Angeles to the City of Los Angeles. The project area is generally bounded by 97th Street to the north, Alameda Street to the east, 103rd Street to the south, and Grape Street to the west, within the jurisdictions of the City of Los Angeles and the unincorporated area of Florence. The following comments are for your consideration and relate to the environmental document only.

Response 3-1

This comment provides a brief summary of the proposed project and indicates that the County of Los Angeles Department of Public Works (LACDPW) has reviewed the Draft EIR. No response to this comment is necessary as it only contains introductory information and is not a specific comment on the environmental analysis in Draft EIR.

Comment 3-2

Services-Traffic/Access

1. Mitigation Measure TT1 shall be revised to state the applicant shall be solely responsible for the design and construction of the traffic signal at the intersection of Alameda Street at 97th Street.

Response 3-2

Please refer to Chapter III Corrections and Additions in this Final EIR. Mitigation Measure **TT1** has been modified as follows:

~~TT12~~ The Applicant shall, under guidance from ~~work with~~ LADOT, ~~to~~ design and construct ~~implement~~ signalization at the following intersections:

- Intersection #36– Alameda Street (W)/97th Street
- Intersection #41 – Wilmington Avenue/Century Boulevard

Comment 3-3

2. The applicant shall consult with the County of Los Angeles Department of Regional Planning to obtain a list of related projects administered by the County to be included in the analysis.

Response 3-3

In February 2010, after the Notice of Preparation (NOP) of the Draft EIR for the proposed project was circulated for public comment, a Cumulative Project Report for all projects within unincorporated Los Angeles County was obtained from the County of Los Angeles Department of Regional Planning. Two scrap metal recycling projects identified in this report within the study area were inadvertently omitted from the traffic study prepared for the proposed project. In December 2010, after the Draft EIR was circulated for public review, Los Angeles County Department of Public Works staff identified another project within unincorporated Los Angeles County not contained within the Cumulative Project Report, the Martin Luther King, Jr. Medical Center Campus Redevelopment (MLK Hospital). Trip generation for these three related projects is shown below in **Table II-1**.

TABLE II-1: RELATED PROJECTS TRIP GENERATION										
Project	Location	Land Use	Size / Units	Daily Trips	Weekday					
					AM Peak Hour			PM Peak Hour		
					In	Out	Total	In	Out	Total
MLK Hospital	12021 Wilmington Avenue in Willowbrook	Hospital	1,291,000	19,677	921	319	1,240	568	1,185	1,753
		Medical Office	300,000							
		Single-Family Residential	100 units							
		Retail	80,000							
		General Office	150,000							
Scrap Metal Recycling Center	9113 South Alameda Street in Walnut Park	Light Industrial	33,395	233	27	4	31	4	28	32
Scrap Metal & CRC Material Recycling Center	2241 East 89 th Street in Walnut Park	Light Industrial	41,857	292	32	4	36	5	36	41
TOTAL				20,202	900	327	1,307	577	1,249	1,826

SOURCE: Iteris. Jordan Downs - Response to Comments Memorandum, February 2, 2011 (Appendix A).

The Draft EIR prepared for the MLK Hospital identified mitigation measures for its project-related impacts. However, since, the mitigation measures are not committed to at this time, these mitigation measures were not incorporated into the proposed project’s updated future conditions traffic analysis discussed below. In addition, since the initial traffic study was prepared, the City of South Gate has installed a traffic signal at study intersection #37, Alameda Street (E) and Tweedy Boulevard, so all future scenarios discussed below consider this intersection to be signalized.

City of Los Angeles Methodology

Existing Plus Ambient Growth Plus Related Projects Level of Service. All study intersections were re-evaluated under this scenario using the CMA - Circular Planning 212 methodology. Level of service analyses under the Existing Plus Ambient Growth Plus Related Projects condition were performed for both AM and PM peak hours and are summarized in **Table II-2**.

TABLE II-2: EXISTING PLUS AMBIENT GROWTH PLUS RELATED PROJECTS PEAK HOUR LOS (CITY OF LOS ANGELES GUIDELINES)					
Intersection	Jurisdiction	AM Peak Hour		PM Peak Hour	
		LOS	V/C	LOS	V/C
1 Alameda St (W)/ Firestone Blvd	County of LA	D	0.825	E	0.920
2 Alameda St (W)/ 92 nd St	County of LA	C	0.762	C	0.742
3 Alameda St (W)/Tweedy Blvd /a/	(Future) City of LA	E	0.932	E	0.957
4 Alameda St (W)/103 rd St /b/	LA City/Lynwood	B	0.695	D	0.810
5 Alameda St (W)/ Century Blvd/MLK	Lynwood	C	0.729	B	0.696
6 Alameda St (W)/Imperial Hwy	County of LA /Lynwood	E	0.995	D	0.843
7 Grape St/103 rd St /b/	County of LA	A	0.422	A	0.380
8 Wilmington Ave/103 rd St /b/	City of LA	A	0.323	A	0.338
9 Wilmington Ave/Santa Ana Blvd /b/	City of LA	A	0.328	A	0.385
10 Wilmington Ave/108 th St /b/	City of LA	A	0.475	A	0.470
11 Wilmington Ave/111 th St /b/	City of LA	A	0.412	A	0.431
12 Wilmington Ave/I-105 EB Ramps /b/	LA City/ County of LA	F	1.057	D	0.808
13 Wilmington Ave/120 th St /b/	County of LA	B	0.678	C	0.772
14 I-105 WB Ramps/Imperial Hwy /b/	City of LA	E	0.926	D	0.861
15 Compton Ave/Century Blvd /b/	City of LA	A	0.275	A	0.331
16 Compton Ave/103 rd St /b/	City of LA	A	0.350	A	0.431
17 Compton Ave/108 th St /b/	City of LA	B	0.664	A	0.493
18 Compton Ave/120 th St /b/	County of LA	A	0.484	A	0.372
19 Central Ave/92 nd St /b/	City of LA	A	0.466	A	0.500
20 Central Ave/Century Blvd /b/	City of LA	C	0.672	B	0.668
21 Central Ave/103 rd St /b/	City of LA	A	0.558	A	0.598
22 Central Ave/108 th St (N) /b/	City of LA	A	0.444	A	0.499
23 Central Ave/108 th St (S) /b/	City of LA	A	0.453	A	0.506
24 Central Ave/120 th St /b/	City of LA	A	0.553	B	0.619
25 McKinley Ave/Century Blvd /b/	City of LA	A	0.256	A	0.249
26 Avalon Blvd/Century Blvd /b/	City of LA	A	0.452	A	0.545
27 Avalon Blvd/92 nd St /b/	City of LA	A	0.351	A	0.373
28 Avalon Blvd/120 th St /b/	City of LA	A	0.423	A	0.491
29 San Pedro St/Century Blvd /b/	City of LA	A	0.487	A	0.531
30 Main St/Century Blvd /b/	City of LA	A	0.516	A	0.525
31 Figueroa St/Century Blvd /b/	City of LA	C	0.704	A	0.544
32 I-110 NB On-Ramp/Century Blvd /b/	City of LA	A	0.372	A	0.300
33 I-110 SB Off-Ramp/Century Blvd /b/	City of LA	A	0.312	A	0.395
34 Long Beach Blvd/Century Blvd	South Gate/Lynwood	C	0.775	C	0.758
35 Long Beach Blvd/Tweedy Blvd	South Gate/Lynwood	C	0.734	B	0.694
36 Alameda St/97 th Street /a//c/	(Future) City of LA (Future) City of LA/	--	--	--	--
37 Alameda St (E)/Tweedy Blvd /c/	South Gate	A	0.556	A	0.441
38 Grape St/97 th St (W)	City of LA	--	--	--	--
39 Grape St 97 th St (E)	City of LA	--	--	--	--
40 Grape St/Century Blvd	City of LA	--	--	--	--
41 Wilmington Ave/Century Blvd	City of LA	--	--	--	--

Note: Unsignalized intersections are analyzed separately; EB= Eastbound; WB: Westbound; NB=Northbound; SB=Southbound; E=East; W=West.
/a/ City of Los Angeles signalized intersections reflect an ATSAC credit which reduces the final V/C ratio by 0.100.
/b/ Intersection will become partially or fully under the City of Los Angeles jurisdiction with annexation, no ATSAC credit is taken.
/c/ Unsignalized intersections are analyzed separately under the Existing Plus Ambient Growth Plus Related Projects Plus Project scenario.
SOURCE: Iteris, Jordan Downs - Response to Comments Memorandum, February 2, 2011 (Appendix A).

As shown, a total of four signalized study intersections are projected to operate at LOS E in the AM or PM peak hours, and one intersection is projected to operate at LOS F. The following four intersections are projected to operate at LOS E during the AM and/or PM peak hours:

- #1 Alameda Street and Firestone Boulevard (PM Peak Hour)
- #3 Alameda Street (W) and Tweedy Boulevard (AM and PM Peak Hours)
- #6 Alameda Street and Imperial Highway (AM Peak Hour)
- #14 I-105 WB Ramps and Imperial Highway (AM Peak Hour)

The following intersection is projected to operate at LOS F:

- #12 Wilmington Avenue and I-105 EB Ramps (AM Peak Hour)

Existing Plus Ambient Growth Plus Related Projects Plus Project Level of Service. All study intersections were re-evaluated using the CMA - Circular Planning 212 methodology per City of Los Angeles Traffic Study Policies and Procedures. Level of service analyses under the Existing Plus Ambient Growth Plus Project Plus Related Projects condition were performed for both AM and PM peak hours and are summarized in **Table II-3**.

As shown, the results indicate that per CMA - Circular Planning 212 methodology, the following five signalized study intersections are projected to experience a significant project-related impact:

- #1 Alameda Street and Firestone Boulevard (PM Peak Hour)
- #5 Alameda Street (W) and Century Boulevard/Martin Luther King Jr. Boulevard (AM and PM Peak Hours)
- #12 Wilmington Avenue and I-105 EB Ramps (AM and PM Peak Hours)
- #20 Central Avenue and Century Boulevard (AM and PM Peak Hours)
- #35 Long Beach Boulevard and Tweedy Boulevard (AM and PM Peak Hours)

The Draft EIR projected project-related impacts at the same locations, except for intersection #12, Wilmington Avenue and I-105 EB Ramps, which was not identified as a location projected to experience a project-related impact.

For intersections #1, #5, #20, and #35, no feasible mitigation measures were identified for these locations in the Draft EIR.

TABLE II-3: SCENARIO 1 AND SCENARIO 2 PEAK HOUR LOS COMPARISON FOR SIGNALIZED INTERSECTIONS

Intersection		AM Peak Hour						PM Peak Hour					
		Existing + AG + RP /a/		Existing + AG + RP + Project /a/		Change in V/C	Sig. Impact	Existing + AG + RP /a/		Existing + AG + RP + Project /a/		Change in V/C	Sig. Impact
		LOS	V/C	LOS	V/C			LOS	V/C	LOS	V/C		
Name	Jurisdiction												
1 Alameda St (W)/Firestone Blvd	LA County	D	0.825	D	0.836	0.011	No	E	0.920	E	0.934	0.014	Yes
2 Alameda St (W)/92 nd Street	LA County	C	0.762	C	0.758	-0.004	No	C	0.742	C	0.742	0.000	No
3 Alameda St (W)/ Tweedy Blvd /b/	City of LA	E	0.932	C	0.763	-0.169	No	E	0.957	D	0.812	-0.145	No
4 Alameda St (W)/103 rd St /c/	City of LA/ Lynwood	B	0.695	B	0.614	-0.081	No	D	0.810	C	0.720	-0.090	No
5 Alameda St (W)/Century Blvd/MLK	Lynwood	C	0.729	C	0.794	0.065	Yes	B	0.696	C	0.771	0.075	Yes
6 Alameda St (W)/Imperial Hwy	LA County/ Lynwood	E	0.995	E	0.997	0.002	No	D	0.843	D	0.850	0.007	No
7 Grape St/103 rd St /c/	City of LA	A	0.422	A	0.483	0.061	No	A	0.380	A	0.442	0.062	No
8 Wilmington Ave/103 rd St /b/	City of LA	A	0.323	A	0.343	0.020	No	A	0.338	A	0.342	0.004	No
9 Wilmington Ave/Santa Ana Blvd /c/	City of LA	A	0.328	A	0.412	0.084	No	A	0.385	A	0.465	0.080	No
10 Wilmington Ave/108 th St /c/	City of LA	A	0.475	A	0.559	0.084	No	A	0.470	A	0.549	0.079	No
11 Wilmington Ave/111 th St /c/	City of LA	A	0.412	A	0.496	0.084	No	A	0.431	A	0.510	0.079	No
12 Wilmington Ave/I-105 EB Ramps/c/	City of LA/ County of LA	F	1.057	F	1.076	0.019	Yes	D	0.808	D	0.853	0.045	Yes
13 Wilmington Ave/120 th St	LA County	B	0.678	C	0.707	0.029	No	C	0.772	C	0.797	0.025	No
14 I-105 WB Ramps/Imperial Hwy /c/	City of LA/ County of LA	E	0.926	E	0.929	0.003	No	D	0.861	C	0.865	0.004	No
15 Compton Ave/Century Blvd /b/	City of LA	A	0.275	A	0.374	0.099	No	A	0.331	A	0.450	0.119	No
16 Compton Ave/103 rd St /c/	City of LA	A	0.350	A	0.319	-0.031	No	A	0.431	A	0.400	-0.031	No
17 Compton Ave/108 th St /c/	City of LA	B	0.664	B	0.684	0.020	No	A	0.493	A	0.513	0.020	No
18 Compton Ave/120 th St /c/	LA County	A	0.484	A	0.498	0.014	No	A	0.372	A	0.383	0.011	No
19 Central Ave/92 nd St /c/	City of LA	A	0.466	A	0.471	0.005	No	A	0.500	A	0.506	0.006	No
20 Central Ave/Century Blvd /c/	City of LA	B	0.672	C	0.787	0.115	Yes	B	0.668	C	0.784	0.116	Yes
21 Central Ave/103 rd St /b/	City of LA	A	0.558	A	0.519	-0.039	No	A	0.598	A	0.562	-0.036	No
22 Central Ave/108 th St (N) /c/	City of LA	A	0.443	A	0.459	0.016	No	A	0.498	A	0.512	0.014	No
23 Central Ave/108 th St (S) /c/	City of LA	A	0.453	A	0.466	0.013	No	A	0.504	A	0.521	0.017	No
24 Central Ave/120 th St /c/	City of LA	A	0.553	A	0.560	0.007	No	B	0.619	B	0.624	0.005	No
25 McKinley Ave/Century Blvd /c/	City of LA	A	0.256	A	0.297	0.041	No	A	0.249	A	0.291	0.042	No
26 Avalon Blvd/Century Blvd /c/	City of LA	A	0.452	A	0.485	0.033	No	A	0.545	A	0.586	0.041	No
27 Avalon Blvd/92 nd St /c/	City of LA	A	0.351	A	0.357	0.006	No	A	0.373	A	0.379	0.006	No
28 Avalon Blvd/120 th St /c/	City of LA	A	0.423	A	0.436	0.013	No	A	0.491	A	0.501	0.010	No
29 San Pedro St/Century Blvd /c/	City of LA	A	0.487	A	0.510	0.023	No	A	0.531	A	0.557	0.026	No
30 Main St/Century Blvd /c/	City of LA	A	0.516	A	0.537	0.021	No	A	0.525	A	0.546	0.021	No
31 Figueroa St/Century Blvd /c/	City of LA	C	0.704	C	0.711	0.007	No	A	0.544	A	0.552	0.008	No
32 I-110 NB On-Ramp/Century Blvd /c/	City of LA	A	0.372	A	0.385	0.013	No	A	0.300	A	0.312	0.012	No
33 I-110 SB Off-Ramp/Century Blvd /c/	City of LA	A	0.312	A	0.319	0.007	No	A	0.395	A	0.400	0.005	No

TABLE II-3: SCENARIO 1 AND SCENARIO 2 PEAK HOUR LOS COMPARISON FOR SIGNALIZED INTERSECTIONS

Intersection		AM Peak Hour							PM Peak Hour					
Name	Jurisdiction	Existing + AG + RP /a/		Existing + AG + RP + Project /a/		Change in V/C	Sig. Impact	Existing + AG + RP /a/		Existing + AG + RP + Project /a/		Change in V/C	Sig. Impact	
		LOS	V/C	LOS	V/C			LOS	V/C	LOS	V/C			
34 Long Beach Blvd/Century Blvd	South Gate/ Lynwood	C	0.775	C	0.784	0.009	No	C	0.758	C	0.768	0.010	No	
35 Long Beach Blvd/Tweedy Blvd	South Gate/ Lynwood	C	0.734	C	0.775	0.041	Yes	B	0.694	C	0.738	0.044	Yes	
36 Alameda St/97th St /b/ /d/	(Future) City of LA /County of LA	--	--	--	--	--	--	--	--	--	--	--	--	
37 Alameda St (E)/Tweedy Blvd /d/	(Future) City of LA /South Gate	A	0.556	B	0.629	0.073	No	A	0.441	A	0.535	0.094	No	
38 Grape St/97 th St (W) /d/	City of LA	--	--	--	--	--	--	--	--	--	--	--	--	
39 Grape St 97 th St (E) /d/	City of LA	--	--	--	--	--	--	--	--	--	--	--	--	
40 Grape St/Century Blvd /d/	City of LA	--	--	--	--	--	--	--	--	--	--	--	--	
41 Wilmington Ave/Century Blvd /d/	City of LA	--	--	--	--	--	--	--	--	--	--	--	--	

/a/ AG means Ambient Growth, and RP means Related Projects.
 /b/ Intersection will become partially or fully under the City of Los Angeles jurisdiction with annexation, no ATSAC credit is taken under Existing + AG + RP conditions.
 /c/ City of Los Angeles signalized intersections reflect an ATSAC credit which reduces the final V/C ratio by 0.100.
 /d/ Unsignalized intersections are analyzed separately.
SOURCE: Iteris, *Jordan Downs - Response to Comments Memorandum*, February 2, 2011.

Unsignalized Intersection Analysis. The unsignalized intersections operating conditions were re-evaluated using the Highway Capacity Methodology (HCM 2000) for unsignalized intersections. For the study intersections, the overall intersection delay is measured pursuant to procedures accepted by LADOT during the scoping process. If, based on the estimated delay, the resultant LOS “E” or “F” in the “Future With Project” scenario, then the intersection should be evaluated for the potential installation of a new traffic signal. Unsignalized intersections were evaluated to determine the need for the installation of a traffic signal or other specific control device, but are not included in the impact analysis.

As shown in **Table II-4**, the results indicate that two of the five unsignalized study intersections are projected to operate at unacceptable LOS F during both the AM and PM peak hours under the Existing Plus Ambient Growth Plus Related Projects Plus Project Scenario. The results from the signal warrant analyses show that the same two intersections identified in the Draft EIR are warranted for signal installation under the Existing Plus Ambient Growth Plus Related Projects Plus Project Scenario.

TABLE II-4: EXISTING PLUS AMBIENT GROWTH PLUS RELATED PROJECT PLUS PROJECT PEAL HOUR LOS/SIGNAL WARRANT (CITY OF LOS ANGELES GUIDELINES)								
Intersection	Jurisdiction	Existing + AG + RP + Project /a/				Signal Warrants Met?		
		AM Peak Hour		PM Peak Hour		AM Peak Hour	PM Peak Hour	
Description		LOS	Delay/ Vehicle	LOS	Delay/ Vehicle			
36 Alameda St (W)/97th St	City of LA/County of LA	F	192.3	F	801.2	Yes	Yes	
38 Grape St/97 th St (W)	City of LA	B	11.9	B	11	No	No	
39 Grape St 97 th St (E)	City of LA	B	11.3	A	9.8	No	No	
40 Grape St/Century Blvd	City of LA	D	32.1	D	30.6	No	No	
41 Wilmington Ave/Century Blvd	City of LA	F	81.4	F	63.6	Yes	Yes	

/a/ AG means Ambient Growth, and RP means Related Projects.
SOURCE: Iteris, Jordan Downs - Response to Comments Memorandum, February 2, 2011.

This updated traffic impact analysis, which includes the trips generated by the three additional related projects, indicates that project-related impacts are projected to occur at five intersections. This is one more than the Draft EIR had identified. Specifically, the intersection of Wilmington Avenue at I-105 EB Ramps was not identified as an impacted intersection in the Draft EIR. However, the following mitigation measures have been identified to reduce this impact to a less-than-significant level:

- **#12 Wilmington Avenue at I-105 EB Ramps.** Provide an additional northbound left turn lane by restriping the existing painted roadway median to convert it into a second northbound left turn lane. Minor signal modifications may be required to align the northbound left turn signal head.

This would reduce the project impact to less than significant. This is a new mitigation measure that the Applicant has agreed to implement.

Similar to the findings presented in the Draft EIR, no feasible mitigation measures have been identified for the following remaining four impacted intersections:

- **#1 Alameda Street and Firestone Boulevard.** This intersection is located outside the City of Los Angeles under the jurisdiction of the County of Los Angeles. This intersection is also projected to experience a significant impact using the County of Los Angeles traffic impact criteria. This intersection is scheduled to be improved via the County’s Traffic Signal Synchronization Program (TSSP), which will facilitate the movement of vehicles through the intersection. No feasible physical

mitigation measures were identified for this intersection that would reduce the project-related impact to a less than significant level. Therefore, a significant project impact would remain.

This is the same finding presented in the Draft EIR.

- **#5 Alameda Street at Century Boulevard/MLK Boulevard.** This intersection is located outside the City of Los Angeles in the City of Lynwood. While it does show a significant impact under City of Los Angeles traffic impact criteria, it does not show an impact using the City of Lynwood criteria. No feasible mitigation measures have been identified that would mitigate the identified impact.

This is the same finding presented in the Draft EIR.

- **#20 Central Avenue at Century Boulevard.** At the intersection of Central Avenue and E. Century Boulevard, because of existing physical constraints, no feasible physical mitigations measures have been identified for this location. Therefore, a significant project impact would remain.

This is the same finding presented in the Draft EIR.

- **#35 Long Beach Boulevard at Tweedy Boulevard.** This intersection is located outside the City of Los Angeles in the Cities of South Gate and Lynwood. While it does show a significant impact under City of Los Angeles criteria, it does not show an impact using the City of South Gate or Lynwood criteria. No feasible mitigation measures have been identified that would mitigate the identified impact.

This is the same finding presented in the Draft EIR.

Level of service analyses under the Existing Plus Ambient Growth Plus Related Projects Plus Project Scenario with mitigations were performed for both AM and PM peak hours and are summarized below in **Tables II-5 and II-6.**

TABLE II-5: EXISTING PLUS AMBIENT GROWTH PLUS RELATED PROJECTS PLUS PROJECT MITIGATION AM PEAK HOUR LOS (CITY OF LOS ANGELES METHODOLOGY)

Intersection		Jurisdiction	AM Peak Hour									
Name	LOS		Existing + AG + RP /a/		Existing + AG + RP + Project /a/		Change in V/C	Sig. Impact	Existing + AG + RP + Project w/ Mitigation /a/		Change in V/C	Sig. Impact
			V/C	LOS	V/C	LOS			V/C			
1	Alameda St (W)/Firestone Blvd	LA County	D	0.825	D	0.836	0.011	No	D	0.836	0.000	No
5	Alameda St (W)/Century Blvd/MLK	Lynwood	C	0.729	C	0.794	0.065	Yes	C	0.794	0.000	Yes
12	Wilmington Ave/I-105 EB Ramps	City of LA/County of LA	F	1.057	F	1.076	0.019	Yes	E	0.931	-0.126	No
20	Central Ave/Century Blvd	City of LA	B	0.672	C	0.787	0.115	Yes	C	0.787	0.116	Yes
35	Long Beach Blvd/Tweedy Blvd	South Gate/Lynwood	C	0.734	C	0.775	0.041	Yes	C	0.775	0.000	Yes

/a/ AG means Ambient Growth, and RP means Related Projects.
SOURCE: Iteris, Jordan Downs - Response to Comments Memorandum, February 2, 2011.

TABLE II-6: EXISTING PLUS AMBIENT GROWTH PLUS RELATED PROJECTS PLUS PROJECT MITIGATION PM PEAK HOUR LOS (CITY OF LOS ANGELES METHODOLOGY)

Intersection		Jurisdiction	PM Peak Hour									
Name	LOS		Existing + AG + RP /a/		Existing + AG + RP + Project /a/		Change in V/C	Sig. Impact	Existing + AG + RP + Project w/ Mitigation /a/		Change in V/C	Sig. Impact
			V/C	LOS	V/C	LOS			V/C			
1	Alameda St (W)/Firestone Blvd	LA County	E	0.920	D	0.934	0.014	Yes	E	0.934	0.000	Yes
5	Alameda St (W)/Century Blvd/MLK	Lynwood	B	0.696	C	0.771	0.075	Yes	C	0.771	0.000	Yes
12	Wilmington Ave/I-105 EB Ramps	City of LA/County of LA	D	0.808	F	0.853	0.045	Yes	B	0.689	-0.119	No
20	Central Ave/Century Blvd	City of LA	B	0.668	C	0.784	0.116	Yes	C	0.784	0.000	Yes
35	Long Beach Blvd/Tweedy Blvd	South Gate/Lynwood	B	0.694	C	0.738	0.044	Yes	C	0.738	0.000	Yes

/a/ AG means Ambient Growth, and RP means Related Projects.
SOURCE: Iteris, Jordan Downs - Response to Comments Memorandum, February 2, 2011.

Other Jurisdictions' Methodology

In order to facilitate review by other agencies, intersections located in unincorporated Los Angeles County, the City of Lynwood and the City of South Gate were also re-evaluated with the additional related projects in place.

Intersection Capacity Utilization (ICU) Methodology (City of Lynwood, City of South Gate Guidelines)

Intersections located in the Cities of Lynwood and South Gate were re-evaluated under the Existing Plus Ambient Growth Plus Related Projects Plus Project Scenario using the ICU methodology per guidelines from the individual jurisdictions, as well as their respective impact criteria. The intersection of Alameda Street (E) and Tweedy Boulevard has been analyzed as a signalized intersection, to reflect that a signal has been installed at this location since the Draft EIR was prepared.

Level of service analyses under this scenario were performed for both AM and PM peak hours and are summarized below in **Table II-7**. As shown, the results indicate that using the local jurisdiction's (other than the City of Los Angeles and Los Angeles County) ICU methodology, one study intersection is projected to experience a significant impact as a result of the addition of project-related traffic during the AM and/or PM peak hours under the Existing Plus Ambient Growth Plus Related Projects Plus Project conditions, as follows:

- #1 Alameda Street and Firestone Boulevard (PM Peak Hour)

This intersection was identified in the Draft EIR as being projected to experience a project-related impact using ICU methodology. As in the Draft EIR, no feasible mitigation measures were identified for this location.

Summary of Analysis

Two additional related (cumulative) projects were added to the analysis. For the Existing Plus Ambient Growth Plus Related Project Plus Project Level of Service analysis using City of Los Angeles traffic impact analysis guidelines, one additional intersection was identified that would be projected to experience a project-related impact. This intersection, Wilmington Avenue and I-105 EB Ramps, now exceeds the City of Los Angeles thresholds for project related impacts with the additional cumulative projects included in the analysis. A mitigation measure was identified for this location, and it reduces the project impact to less than significant.

For unsignalized intersections, two intersections meet signal warrants; these same two intersections met signal warrants in the original study. A third intersection, located in the City of South Gate, previously met signal warrants; however, the City of South Gate has recently installed a traffic signal at this location. Therefore, there is no change to the study results for unsignalized intersections.

Please refer to the Traffic and Transportation heading in Chapter III Corrections and Additions in this Final EIR.

TABLE II-7: SCENARIO 1 AND SCENARIO 2 PEAK HOUR LOS COMPARISON FOR SIGNALIZED INTERSECTIONS

Intersection		AM Peak Hour						PM Peak Hour					
Name	Jurisdiction	Existing + AG + RP /a/		Existing + AG + RP + Project /a/		Change in V/C	Sig. Impact	Existing + AG + RP /a/		Existing + AG + RP + Project /a/		Change in V/C	Sig. Impact
		LOS	V/C	LOS	V/C			LOS	V/C	LOS	V/C		
1 Alameda St (W)/Firestone Blvd	County of LA /b/	--	--	--	--	--	--	--	--	--	--	--	--
	South Gate	D	0.873	D	0.884	0.011	No	E	0.962	E	0.975	0.013	Yes
4 Alameda St (W)/103 rd St /b/	City of LA /c/	--	--	--	--	--	--	--	--	--	--	--	--
	Lynwood	D	0.808	C	0.736	-0.072	No	E	0.910	D	0.830	0.080	No
5 Alameda St (W)/Century Blvd/MLK	Lynwood	C	0.750	D	0.807	0.057	No	C	0.720	C	0.787	0.067	No
6 Alameda St (W)/Imperial Hwy	County of LA /b/	--	--	--	--	--	--	--	--	--	--	--	--
	Lynwood	E	0.957	E	0.960	0.003	No	D	0.825	D	0.831	0.006	No
34 Long Beach Blvd/Century Blvd	South Gate						No						No
	Lynwood	C	0.790	C	0.798	0.008	No	C	0.775	C	0.784	0.009	No
35 Long Beach Blvd/Tweedy Blvd	South Gate						No						No
	Lynwood	C	0.753	C	0.790	0.037	No	C	0.719	C	0.757	0.038	No
37 Alameda St (E)/Tweedy Blvd /c/	City of LA /c/	--	--	--	--	--	--	--	--	--	--	--	--
	South Gate	B	0.615	B	0.674	0.059	No	A	0.498	A	0.557	0.059	No

/a/ AG means Ambient Growth, and RP means Related Projects.
 /b/ See separate County of Los Angeles analysis (Response 3-4).
 /c/ City of LA intersections previously analyzed with City of LA Guidelines using CMA methodology.
SOURCE: Iteris, Jordan Downs - Response to Comments Memorandum, February 2, 2011.

Comment 3-4

3. The Traffic Impact Study shall conduct the level of service analyses at the County and/or County/City intersections using the County's methodology. Using the County's methodology, the project is expected to have a significant impact at the following intersection:

- Wilmington Avenue at I-105 Eastbound Ramps

If you have any questions regarding traffic comment Nos. 1 through 3, please contact Mr. Isaac Wong at (626) 300-4796 or iswong@dpw.lacounty.gov.

Response 3-4

Although the City of Los Angeles is the lead agency for the proposed project, the requested analysis for County and/or County/City intersections has been conducted in order to facilitate review by Los Angeles County. The County methodology consists of:

- (a) Existing traffic;
- (b) Existing traffic plus ambient growth to the year the project will be completed (preproject);
- (c) Traffic in (b) plus project traffic; this scenario is compared to (b) to determine project impacts;
- (d) Traffic in (c) with the proposed mitigation measures (if necessary);
- (e) Traffic in (c) plus the cumulative traffic of other known developments; this scenario is compared to (c) to determine cumulative impacts; and
- (f) Traffic in (e) with the proposed mitigation measures (if necessary).

This is slightly different than the City of Los Angeles methodology, which consists of:

- (a) Existing conditions;
- (b) Future without project with ambient growth and related projects (this is not calculated under Los Angeles County methodology);
- (c) Future with project with ambient growth and related projects; this is compared to (b) to determine project impacts, and is the same value as (e) under County methodology; and
- (d) Traffic in (c) with traffic mitigation (if necessary); this is the same as (f) under County methodology.

Therefore, we have added an analysis scenario to identify project impacts using County methodology. Project impacts are identified through the use of the following:

- Existing traffic plus ambient growth compared to existing traffic plus ambient growth plus project traffic.

Project related impacts are shown in **Table II-8** and show that using County methodology, project impacts are projected to occur at the following intersections:

- #1 Alameda Street and Firestone Boulevard (PM Peak Hour)
- #12 Wilmington Avenue and I-105 EB Ramps (AM and PM Peak Hours)

The intersection of Wilmington Avenue and I-105 EB Ramps was not previously identified in the Draft EIR. No feasible mitigation measures were identified for the Alameda Street/Firestone Boulevard intersection, and a significant and unavoidable impact will remain. The mitigation measure identified in Response 3-3 fully mitigates the project related impact at the intersection of Wilmington Avenue and I-105 EB Ramps. This mitigation measure is also identified in Chapter III Correction and Additions as Mitigation Measure **TT1**.

TABLE II-8: SCENARIO 1 AND SCENARIO 2 PEAK HOUR LOS COMPARISON FOR SIGNALIZED INTERSECTIONS													
Intersection		AM Peak Hour						PM Peak Hour					
Name	Jurisdiction	Existing + AG /a/		Existing + AG + Project /a/		Change in V/C	Sig. Impact	Existing + AG /a/		Existing + AG + Project /a/		Change in V/C	Sig. Impact
		LOS	V/C	LOS	V/C			LOS	V/C	LOS	V/C		
1 Alameda St (W)/Firestone Blvd	LA County	D	0.840	D	0.851	0.011	No	E	0.901	E	0.915	0.014	Yes
2 Alameda St (W)/92 nd Street	LA County	D	0.810	D	0.808	-0.002	No	C	0.783	C	0.782	-0.001	No
6 Alameda St (W)/Imperial Hwy	LA County/Lynwood	E	0.925	E	0.927	0.002	No	D	0.805	D	0.813	0.008	No
12 Wilmington Ave/I-105 EB Ramps /b/	City of LA/County of LA	E	0.971	E	0.988	0.017	Yes	C	0.738	C	0.778	0.040	Yes
13 Wilmington Ave/120 th St	LA County	B	0.649	B	0.667	0.018	No	B	0.636	B	0.660	0.024	No
14 I-105 WB Ramps/Imperial Hwy /b/	City of LA/County of LA	E	0.910	E	0.912	0.002	No	D	0.893	D	0.897	0.004	No
18 Compton Ave/120 th St /b/	LA County	A	0.551	A	0.563	0.012	No	A	0.448	A	0.459	0.011	No

/a/ AG means Ambient Growth.
/b/ City of Los Angeles signalized intersections reflect an ATSAC credit which reduces the final V/C ratio by 0.100.
SOURCE: Iteris, Jordan Downs - Response to Comments Memorandum, February 2, 2011.

Comment 3-5

4. Will the 97th Street right of way between Croesus Avenue and Alameda Street be split between City and County, or will the right of way continue to be 100 percent County?

Response 3-5

The 97th Street right-of-way between Croesus Avenue and Alameda Street would be under full jurisdiction of the City of Los Angeles upon implementation of the proposed project.

Comment 3-6

5. Will the 103rd Street right of way become 100 percent City? The portion between the current City/County border and Alameda Street needs to either become 100 percent City or split between the Cities of Los Angeles and Lynwood since there will no longer be any County jurisdiction in this area.

Response 3-6

The 103rd Street right-of-way between the City and County border and Alameda Street would be under full jurisdiction of the City of Los Angeles upon implementation of the proposed project.

Comment 3-7

6. Will the City take over all of Alameda Street between 97th and 103rd Street?

If you have any questions regarding traffic comment Nos. 4 through 6, please contact Mr. Dennis Ittner at (562) 869-1176 or dittner@dpw.lacounty.gov.

Response 3-7

The Alameda Street right-of-way between 97th Street and 103rd Street would be under full jurisdiction of the City of Los Angeles upon implementation of the proposed project.

Comment 3-8

All or portion of the site is located within a potentially liquefiable area per the State of California Seismic Hazard Zones Map—South Gate Quadrangle. Public Works' Geotechnical and Materials Engineering Division reports should be included in the Environmental Impact Report as necessary.

If you have any questions regarding the geotechnical/soils/geology comment, please contact Mr. Jeremy Wan at (626) 458-4925 or jwan@dpw.lacounty.gov.

Response 3-8

This comment indicates that project site is located within a potentially liquefiable area. Section IV.G Geology and Soils of the Draft EIR acknowledges that the Specific Plan area is located within an area potentially subject to liquefaction in the event of an earthquake. The Los Angeles Building Code requires that construction activities be subject to the approval of a site-specific geotechnical study, which would specifically address liquefaction and include measures to address liquefaction. Compliance with the City's established building standards, as well as adherence to the requirements contained in a site-specific geotechnical investigation, would ensure that potential impacts related to liquefaction would be less than significant.

The Draft EIR further indicates that Los Angeles Building Code requires that construction activities be subject to the approval of a site-specific geotechnical study, which would specifically address liquefaction and include measures to address liquefaction. Therefore, the analysis in the Draft EIR concludes that with compliance with the City's established building standards and adherence to the requirements contained in a site-specific geotechnical investigation, potential impacts related to liquefaction would be less than significant.

Comment 3-9

We request the opportunity to review and comment on future Environmental Impact Reports as they become available. If you have any other questions or require additional information, please contact Mr. Toan Duong at (626) 458-4921 or tduong@dpw.lacounty.gov.

Response 3-9

This comment is noted, and no further response to this comment is necessary as it is not a specific comment on the environmental analysis in the Draft EIR.



Letter No. 4
COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294

(323) 890-4330

P. MICHAEL FREEMAN
FIRE CHIEF
FORESTER & FIRE WARDEN

RECEIVED
CITY OF LOS ANGELES

DEC 08 2010

ENVIRONMENTAL
UNIT

December 2, 2010

Adam Villani, Environmental Coordinator
Department of City Planning
Planning Section
200 North Spring Street, Room 750
Los Angeles, CA 90012

Dear Mr. Villani:

NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT, NO. ENV-2010-0032, STATE CLEARINGHOUSE NO. 2010021007, JORDAN DOWNS SPECIFIC PLAN, LOS ANGELES (FFER #201000236)

4-1

The Notice of Availability of a Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

PLANNING DIVISION:

Public Services

- Paragraph three should be corrected to state, "Fire Station 41 is located approximately 1.5 miles south of the annexation area. Fire Station 41 has a daily staff of six who have the following assignments: one Captain, one Fire Fighter Specialist, one Fire Fighter/Paramedic and one Fire Fighter assigned to a four-person assessment engine company and; two Fire Fighter/Paramedics assigned to a two-person paramedic squad."

4-2

LAND DEVELOPMENT UNIT:

- This project is located entirely in the City of Los Angeles. Therefore, the City of Los Angeles Fire Department has jurisdiction concerning this project and will be setting conditions. This project is located in close proximity to the jurisdictional area of the Los Angeles County Fire Department. However, this project is unlikely to have an impact that necessitates a comment concerning general requirements from the Land Development Unit of the Los Angeles County Fire Department.

4-3

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS	BRADBURY	CUDAHY	HAWTHORNE	LA MIRADA	MALIBU	POMONA	SIGNAL HILL
ARTESIA	CALABASAS	DIAMOND BAR	HIDDEN HILLS	LA PUENTE	MAYWOOD	RANCHO PALOS VERDES	SOUTH EL MONTE
AZUSA	CARSON	DUARTE	HUNTINGTON PARK	LAKWOOD	NORWALK	ROLLING HILLS	SOUTH GATE
BALDWIN PARK	CERRITOS	EL MONTE	INDUSTRY	LANCASTER	PALMDALE	ROLLING HILLS ESTATES	TEMPLE CITY
BELL	CLAREMONT	GARDENA	INGLEWOOD	LAWNDALE	PALOS VERDES ESTATES	ROSEMEAD	WALNUT
BELL GARDENS	COMMERCE	GLENDORA	IRWINDALE	LOMITA	PARAMOUNT	SAN DIMAS	WEST HOLLYWOOD
BELLFLOWER	COVINA	HAWAIIAN GARDENS	LA CANADA-FLINTRIDGE	LYNWOOD	PICO RIVERA	SANTA CLARITA	WESTLAKE VILLAGE
			LA HABRA				WHITTIER

2. This project does not propose construction of structures or any other improvements at this time. Therefore, until actual construction is proposed, the project will not have a significant impact to the Fire Department, Land Development Unit. 4-4

3. The statutory responsibilities of the County of Los Angeles Fire Department, Land Development Unit, are the review of, and comment on, all projects within the unincorporated areas of the County of Los Angeles. Our emphasis is on the availability of sufficient water supplies for fire fighting operations and local/regional access issues. However, we review all projects for issues that may have a significant impact on the County of Los Angeles Fire Department. We are responsible for the review of all projects within Contract Cities (Cities that contract with the County of Los Angeles Fire Department for fire protection services).

We are responsible for all County facilities located within non-contract Cities. The County of Los Angeles Fire Department, Land Development Unit may also comment on conditions that may be imposed on a project by the Fire Prevention Division, which may create a potentially significant impact to the environment. 4-5

4. Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department, Land Development Unit's Inspector, Claudia Soiza, at (323) 890-4243.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

1. The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance. 4-6

2. The areas germane to the statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division have been addressed.

HEALTH HAZARDOUS MATERIALS DIVISION:

1. The Health Hazardous Materials Division has no objection to the proposed project. However, it should be noted that properties with historical use or storage of hazardous materials onsite may be contaminated. These properties should obtain a "No Further Action Letter" from a local or State agency prior to redevelopment. 4-7

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,


JOHN R. TODD, CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

JRT:lj

LETTER 4

December 2, 2010

John Todd, Chief, Forestry Division, Prevention Services Bureau
County of Los Angeles
Fire Department
1320 North Eastern Avenue
Los Angeles, CA 90063-3204

Comment 4-1

The Notice of Availability of a Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

Response 4-1

No response to this comment is necessary as it only contains introductory information and is not a specific comment on the environmental analysis in the Draft EIR.

Comment 4-2

PLANNING DIVISION:

Public Services

1. Paragraph three should be corrected to state, "Fire Station 41 is located approximately 1.5 miles south of the annexation area. Fire Station 41 has a daily staff of six who have the following assignments: one Captain, one Fire fighter Specialist, one Fire/Paramedic and one Fire Fighter assigned to a four-person assessment engine company and; two Fire Fighter/Paramedics assigned to a two-person paramedic squad."

Response 4-2

This correction has been made to Section IV.N Public Services of the Draft EIR. Please refer to the Public Services heading in Chapter III Corrections and Additions in this Final EIR.

Comment 4-3

LAND DEVELOPMENT UNIT:

1. This project is located entirely in the City of Los Angeles. Therefore, the City of Los Angeles Fire Department has jurisdiction concerning this project and will be setting conditions. This project is located in close proximity to the jurisdictional area of the Los Angeles County Fire Department. However, this project is unlikely to have an impact that necessitates a comment concerning general requirements from the Land Development Unit of the Los Angeles County Fire Department.

Response 4-3

As stated in Section IV.N Public Services of the Draft EIR, this comment indicates that the City of Los Angeles Fire Department will have jurisdiction over the proposed project. The comment further states

that the proposed project is unlikely to impact the Land Development Unit of the County Fire Department. This comment is noted and will be provided to the decision-makers for consideration.

Comment 4-4

2. This project does not propose construction of structures or any other improvements at this time. Therefore, until actual construction is proposed, the project will not have a significant impact to the Fire Department, Land Development Unit.

Response 4-4

This comment states that the proposed project does not propose construction of structures or any other improvements at this time. However, implementation of the proposed project will require construction. As discussed in Comment and Response 4-3, the City of Los Angeles Fire Department will have jurisdiction concerning the proposed project. Impacts to related to fire protection and emergency services were determined to be less than significant. The following standard mitigation measures were included to ensure adequate service and consultation with the LAFD occurs.

- PS1** Project plans shall be submitted to LAFD for review and approval to ensure that all new structures would comply with current fire codes and LAFD requirements.
- PS2** HACLA shall consult with the LAFD and incorporate fire protection and suppression features that are appropriate for the design of the proposed project.
- PS3** HACLA shall consult with the LAFD to ensure the proper emergency access points and routes are provided.

Comment 4-5

3. The statutory responsibilities of the County of Los Angeles Fire Department, Land Development Unit, are the review of, and comment on, all projects within the unincorporated areas of the County of Los Angeles. Our emphasis is on the availability of sufficient water supplies for fire fighting operations and local/regional access issues. However, we review all projects for issues that may have a significant impact on the County of Los Angeles Fire Department. We are responsible for the review of all projects within Contract Cities (Cities that contract with the County of Los Angeles Fire Department for fire protection services).

We are responsible for all County facilities located within non-contract Cities. The County of Los Angeles Fire Department, Land Development Unit may also comment on conditions that may be imposed on a project by the Fire Prevention Division, which may create a potentially significant impact to the environment.

4. Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department, Land Development Unit's Inspector, Claudia Soiza, at (323) 890-4243.

Response 4-5

This comment is noted and will be provided to the decision-makers for consideration. No further response to this comment is necessary as it is not a specific comment on the environmental analysis in the Draft EIR.

Comment 4-6

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

1. The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archaeological and cultural resources, and the County Oak Tree Ordinance.
2. The areas germane to the statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division have been addressed.

Response 4-6

This comment is noted and will be provided to the decision-makers for consideration. No further response to this comment is necessary as it is not a specific comment on the environmental analysis in the Draft EIR.

Comment 4-7

HEALTH HAZARDOUS MATERIAL DIVISION:

1. The Health Hazardous Materials Division has no objection to the proposed project. However, it should be noted that properties with historical use or storage of hazardous materials onsite may be contaminated. These properties should obtain a “No Further Action Letter” from a local or State agency prior to redevelopment.

If you have any additional questions, please contact this office at (323) 890-4330.

Response 4-7

This comment is noted and will be provided to the decision-makers for consideration. Mitigation Measures **HM3** through **HM17** implement the Voluntary Cleanup Agreement between HACLA and the California Department of Toxic Control (DTSC) to develop and conduct a Remedial Investigation/Feasibility Study for any hazardous substance on or emanating from the HACLA-owned, 21.08-acre property to ensure that the property is properly remediated to the DTSC’s satisfaction. DTSC would issue “No Further Action Letter” prior to redevelopment.



County of Los Angeles Public Library ■ www.colapublib.org
7400 East Imperial Hwy., Downey, CA 90242 ■ (562) 940-8400



Margaret Donnellan Todd
County Librarian

December 23, 2010

Adam Villani
Environmental Review Coordinator
Los Angeles Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Dear Mr. Villani:

**NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT
NO. ENV-2010-0032-EIR
FOR THE JORDAN DOWNS SPECIFIC PLAN**

This is to provide you with written comments on the Notice of Availability of a Draft Environmental Impact Report (DEIR) for the above referenced project. In summary, the Jordan Downs Specific Plan involves the development of 1,800 residential units. While the majority of the Specific Plan area is within the City of Los Angeles (City), approximately 41.74 acres are within the unincorporated areas of the County of Los Angeles (County). The Specific Plan also involves the annexation of the unincorporated areas to the City.

5-1

The existing residents of the unincorporated areas are currently served by the County's Graham Library. However, as indicated in the DEIR and in the County Library's previous comments, the City of Los Angeles will be responsible to provide library services to all project residents, if the proposed annexation is approved.

5-2

It is critical that a new library is built within the Specific Plan area. According to the DEIR, the City's existing Watts Branch Library, which currently serves the City portion of the Specific Plan area, does not meet the City's branch library facility size standards and the City does not have any plans to expand the Watts Branch Library or construct a new facility within the vicinity of the Watts community. Without an on-site library facility within the Specific Plan area, the population increase from the Project would detrimentally affect the service capacity of the County's Graham Library due to its convenient proximity to the Specific Plan area. The Graham Library is already inadequate to effectively serve the existing residents of its service area.

5-3

Other Comments/Corrections on the County Library's Section:

The proposed deletions and insertions are indicated in **bold** font.

Page IV.N-15 – Public Services - County of Los Angeles Public Library

The LACPL system comprises **8886** community libraries **and 4 bookmobiles** throughout Los

Angeles County. The Annexation Area is within the service area of the LAPL Graham Library (Figure IV.N-5). The Graham Library is located approximately 0.80 miles northwest of the Specific Plan area at 1900 East Firestone Boulevard. The Graham Library is a ~~5,145~~ **5,125** square-foot facility that houses a collection of ~~59,831~~ **44,554 materials which includes** books, ~~4837~~ audio recordings, and ~~74~~ magazine and newspaper subscriptions.⁴⁴ -The Graham Public Library has an estimated service population of 35,387.^{42,43}

To determine the adequate level of service required for a population served by a LACPL branch community library, the LACPL utilizes a materials-to-resident ratio and a facility square footage-to-resident ratio. The LACPL materials-to-residents ratio is 2.75 materials to one resident.⁴⁴ Based upon the LACPL materials-to-resident ratio, the Graham Library service population would require 97,314 materials to be adequately served. Currently, the Graham Library has ~~64,739~~ **44,554** materials and is deficient by ~~32,575~~ **52,760** materials. The LACPL facility square footage-to-resident ratio is 0.5 square foot to one resident.⁴⁵ Based upon the LACPL facility square footage-to-resident ratio, the service population of the Graham Library requires a ~~17,693~~ **17,694**-square –foot library facility to be adequately served. Currently, the Graham Library is a ~~5,145~~ **5,125**-square-foot facility and is deficient by ~~12,549~~ **12,568** square feet.

5-3
(cont.)

In addition, please make the following corrections that are reflected throughout the Public Services section of the DEIR.

- Please use **County of Los Angeles Public Library** not Los Angeles County Public Library.

If you have any questions or need additional information, please feel free to contact Malou Rubio at (562) 940-8450 or mrubio@library.lacounty.gov.

Sincerely,


Yolanda De Ramus
Assistant Director, Administrative Services

YDR:MR:MB:vm

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c: Malou Rubio, Head, Support Services
Robert Seal, Library Administrator, Public Services Administration
Ting Fanti, Head, Budget and Fiscal Services

LETTER 5

December 23, 2010

Yolanda De Ramus, Assistant Director, Administrative Services
County of Los Angeles Public Library
7400 East Imperial Highway
Downey, Ca 90242

Comment 5-1

This is to provide you with written comments on the Notice of Availability of a Draft Environmental Impact Report (DEIR) for the above referenced project. In summary, the Jordan Downs Specific Plan involves the development of 1,800 residential units. While the majority of the Specific Plan area is within the City of Los Angeles (City), approximately 41.74 acres are within the unincorporated areas of the County of Los Angeles (County). The Specific Plan also involves the annexation of the unincorporated areas to the City.

Response 5-1

This comment is noted and will be provided to the decision-makers for consideration. No further response to this comment is necessary as it is not a specific comment on the environmental analysis in the Draft EIR.

Comment 5-2

The existing residents of the unincorporated areas are currently served by the County's Graham Library. However, as indicated in the DEIR and in the County Library's previous comments, the City of Los Angeles will be responsible to provide library services to all project residents, if the proposed annexation is approved.

Response 5-2

This comment is noted and will be provided to the decision-makers for consideration. Mitigation Measure **PS9** requires HACLA to consult with the City of Los Angeles Public Library (LAPL) to develop a plan to build a library sub-branch within the Specific Plan area to serve the residents of the Specific Plan area.

Comment 5-3

It is critical that a new library is built within the Specific Plan area. According to the DEIR, the City's existing Watts Branch Library, which currently serves the City portion of the Specific Plan area, does not meet the City's branch library facility size standards and the City does not have any plans to expand the Watts Branch Library or construct a new facility within the vicinity of the Watts community. Without an on-site library facility within the Specific Plan area, the population increase from the Project would detrimentally affect the service capacity of the County's Graham Library due to its convenient proximity to the Specific Plan area. The Graham Library is already inadequate to effectively serve the existing residents of its service area.

Other Comments/Corrections on the County Library's Section:

The proposed deletions and insertions are indicated in **bold** font.

Page IV.N-15 – Public Services – County of Los Angeles Public Library

The LACPL system compromises ~~8886~~ community libraries **and 4 bookmobiles** throughout Los Angeles County. The Annexation Area is within the service area of the LAPL Graham Library (Figure IV.N-5). The Graham Library is located approximately 0.80 miles northwest of the Specific Plan area at 1900 East Firestone Boulevard. The Graham library is a ~~5,145~~ **5,125** square-foot facility that houses a collection of ~~59,831~~ **44,554 materials which includes** books, ~~4837~~ audio recordings, and ~~71~~ magazine and newspaper subscriptions.⁴⁴ – The Graham Public Library has an estimated service population of 35,387.^{42,43}

To determine the adequate level of service required for a population served by a LACPL branch community library, the LACPL utilizes a materials-to-residents ratio and a facility square footage-to-resident ration. The LACPL material-to-residents ratio is 2.75 materials to one resident.⁴⁴ Based upon the LACPL material-to-resident ratio, the Graham Library service population would require 97,314 materials to be adequately served. Currently, the Graham Library has ~~64,739~~ **44,554** material and is deficient by ~~32,575~~ **52,760** materials. The LACPL facility square footage-to-resident ration is 0.5 square foot to one resident.⁴⁵ Based upon the LACPL facility square footage-to-resident ration, the service population of the Graham Library requires a ~~17,693~~ **17,694**-square-foot library facility and is deficient by ~~12,549~~ **12,568** square feet.

In addition, please make the following corrections that are reflected throughout the Public Services section of the DEIR.

- Please use the **County of Los Angeles Public Library** not the Los Angeles County Public Library.

If you have any questions or need additional information, please feel free to contact Malou Rubio at (562) 940-8450 or mrubio@library.lacounty.gov.

Response 5-3

These corrections and additions have been to Section IV.N Public Services of the Draft EIR. Please refer to Public Services heading in Chapter III Corrections and Additions in this Final EIR. The Draft EIR concludes that with implementation of Mitigation Measure **PS9**, which requires HACLA to consult with the LAPL to develop a plan to build a library sub-branch on-site to serve the residents of the Specific Plan area, impacts related to libraries would be less than significant.



Trammell Hartzog, President
Jerry Crabill, P.E. (Retired)
Gerald J. Stock, P.E.,
Executive Vice President

275 Centennial Way
Suite 208
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Phone: (714) 731-9455
FAX: (714) 731-9498

www.hartzog-crabill.com

December 30, 2010

Mr. Adam Villani
Environmental Review Coordinator
Department of City Planning
City of Los Angeles
200 North Spring Street, Room 750
Los Angeles, CA 90012

**Subject Review Comments on the Traffic and Transportation
Section for the *Jordan Downs Specific Plan Draft
Environmental Impact Report in the City of Los Angeles***

Dear Mr. Villani:

On behalf of the City of South Gate as the City's traffic consultant, Hartzog & Crabill, Inc. (HCI) has reviewed the Traffic and Transportation Section of the *Jordan Downs Specific Plan Draft Environmental Impact Report* (DEIR) (Terry A. Hayes Associates Inc. (TAHA), November 18, 2010). The Traffic and Transportation Section of the DEIR summarizes the findings and recommendations presented in the *Jordan Downs Specific Plan Traffic Impact Study* (TIS) (Iteris, September 2010). HCI has the following comments on the DEIR:

6-1

1. As noted in the second paragraph from the bottom on page IV.P-25, the intersection of Alameda Street (East) at Tweedy Boulevard will be signalized by the City of South Gate through its Capital Improvement Program. Therefore, this intersection should be analyzed as a signalized intersection for future conditions in year 2020 instead of as an unsignalized intersection. The traffic analysis should determine if implementation of the proposed project will create a significant adverse impact to the signalized intersection of Alameda Street (East) at Tweedy Boulevard and provide mitigation measures to reduce the significant adverse impacts, if any, to below a level of significance. It should be noted that the City of South Gate has recently completed the installation of the traffic signal at this intersection.

6-2

6-3

2. As noted in the third paragraph from the top on page IV.P-35, no mitigation is required because the City of South Gate Capital Improvement Program will install a traffic signal at this intersection. However, as noted above, the City of South Gate has completed the installation of the traffic signal at this intersection, and the intersection should be analyzed as a signalized intersection for future conditions in

6-4

Mr. Adam Villani
December 30, 2010
Page 2 of 2

year 2020. Therefore, the traffic analysis should determine if there are any other improvements required in addition to installing a traffic signal.

6-4
(cont.)

HCI appreciates the opportunity to review and provide comments on the DEIR for the proposed Jordan Downs Specific Plan. If you have any questions or desire additional information, please contact us at (714) 731-9455.

6-5

Sincerely,
Hartzog & Crabill, Inc.



Scott Ma, P.E., T.E.
Senior Engineer

Jordan Downs – DEIR Comment Letter

SM/prh

LETTER 6

December 30, 2010

Scott Ma, Senior Engineer
Hartzog & Crabill, on behalf of the City of South Gate
275 Centennial Way, Suite 208
Tustin, CA 92780

Comment 6-1

On behalf of the City of South Gate as the City's traffic consultant, Hartzog & Crabill, Inc. (HCI) has reviewed the Traffic and Transportation Section of the *Jordan Downs Specific Plan Draft Environmental Impact Report* (DEIR) (Terry A. Hayes Associates Inc. (TAHA), November 18, 2010). The Traffic and Transportation Section of the DEIR summarizes the findings and recommendations presented in the *Jordan Downs Specific Plan Traffic Impact Study* (TIS) (Iteris, September 2010). HCI has the following comments on the DEIR:

Response 6-1

This comment is noted. No response to this comment is necessary as it is not a specific comment on the environmental analysis in the Draft EIR.

Comment 6-2

1. As noted in the second paragraph from the bottom on page IV.P-25, the intersection of Alameda Street (East) at Tweedy Boulevard will be signalized by the City of South Gate through its Capital Improvement Program. Therefore, this intersection should be analyzed as a signalized intersection for future conditions in year 2020 instead of as an unsignalized intersection. The traffic analysis should determine if implementation of the proposed project will create a significant adverse impact to the signalized intersection of Alameda Street (East) at Tweedy Boulevard and provide mitigation measures to reduce the significant adverse impacts, if any, to below a level of significance.

Response 6-2

At the time the traffic study was prepared, the Alameda Street (East)/Tweedy Boulevard intersection was not signalized. As requested by the commenter, the traffic analysis was updated to reflect the signalization of this intersection. Please see Responses 3-3 and 3-4. The updated traffic analysis determined that the proposed project would result in a less-than-significant impact at this intersection (Alameda Street (East)/Tweedy Boulevard) and no mitigation is required.

Comment 6-3

It should be noted that the City of South Gate has recently completed the installation of the traffic signal at this intersection.

Response 6-3

The recent signalization of the Alameda Street (East)/Tweedy Boulevard intersection has been incorporated into the updated traffic analysis. Please refer to Responses 3-3, 3-4, and 6-2, and the Traffic and Transportation heading in Chapter III Corrections and Additions in this Final EIR.

Comment 6-4

2. As noted in the third paragraph from the top on page IV.P-35, no mitigation is required because the City of South Gate Capital Improvement Program will install a traffic signal at this intersection. However, as noted above, the City of South Gate has completed the installation of the traffic signal at this intersection, and the intersection should be analyzed as a signalized intersection for future conditions in year 2020. Therefore, the traffic analysis should determine if there are any other improvements required in addition to installing a traffic signal.

Response 6-4

Please refer to Response 6-2 and Chapter III Corrections and Additions in this Final EIR.

Comment 6-5

HCI appreciates the opportunity to review and provide comments on the DEIR for the proposed Jordan Downs Specific Plan. If you have any questions or desire additional information, please contact us at (714) 731-9455.

Response 6-5

This comment is noted. No further response to this comment is necessary as it is not a specific comment on the environmental analysis in the Draft EIR.



Metro

Metropolitan Transportation Authority

Letter No. 7

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

December 29, 2010

Mr. Adam Villani
Environmental Review Coordinator
Los Angeles Department of City Planning
200 North Spring Street, Room 750
Los Angeles, CA 90012

Dear Mr. Villani:

Los Angeles County Metropolitan Transportation Authority (Metro) is in receipt of the Draft Environmental Impact Report (DEIR) for the Jordan Downs Specific Plan. In response to the proposed rerouting of Metro Line 117 as part of an extension of Century Boulevard through the project site:

7-1

1. Due to the fact Line 117 uses 103rd Street to serve the Blue Line station, it is imperative that the line remain on 103rd Street west of the project site. However, the line could potentially be rerouted via Grape Street to Century Boulevard in the project area;

7-2

2. Although such a reroute of Line 117 is likely feasible given that Metro Line 254 currently uses Grape Street, Metro cannot confirm feasibility until the streets are designed. In addition, further study would be needed to determine the feasibility of bus turns at Grape & Century;

7-3

7-4

3. Assuming the reroute of Line 117 is feasible, bus stops at Century & Grape may be included. Depending on where these stops would be situated, several issues could arise including potential impacts on nearby residences on Grape Street, a danger from a potential increase in jaywalking, and potentially inadequate bus turning radii. In order to ensure the proper location of bus stops at this location, more details are needed regarding the extension of Century Boulevard, including the following:

7-5

- Number of traffic lanes in each direction
- Will there be a left turn pocket on westbound Century at Grape?

4. This reroute would cause the abandonment of four stops on 103rd Street in each direction including those that currently serve Jordan High School. As a result, stops at Century at roughly Juniper should be included as part of the reroute. The project sponsor should coordinate with LAUSD/Jordan High School to obtain their concurrence and ensure that students have access from the north side of campus to the bus stops near this location. A new school gate may be required;

7-6

- 5. The resulting new intersection of Century and Alameda will need a traffic signal to ensure safe transit operations. | 7-7

In addition, the following should be included in the Final EIR:

- 6. Evidence that in addition to Metro, all affected Municipal transit operators received the NOP for the Draft EIR; | 7-8
- 7. Estimated project transit trip generation for both morning and evening peak periods; | 7-9
- 8. Documentation on the assumptions/analyses used to determine the number and percentage of trips assigned to transit. | 7-10

Metro Bus Operations Control Special Events Coordinator should be contacted at 213-922-4632 regarding construction activities that may impact Metro bus lines. | 7-11

Other Municipal Bus Service Operators including LADOT may also be impacted and therefore should be included in construction outreach efforts. | 7-12

If you have any questions regarding this response, please call me at 213-922-2836 or by email at hartwells@metro.net. Please send the Final EIR to the following address:

Metro CEQA Review Coordination | 7-13
One Gateway Plaza MS 99-23-2
Los Angeles, CA 90012-2952
Attn: Scott Hartwell

Sincerely,



Scott Hartwell
CEQA Review Coordinator, Long Range Planning

LETTER 7

December 29, 2010

Scott Hartwell, CEQA Review Coordinator, Long Range Planning
Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012-2952

Comment 7-1

Los Angeles County Metropolitan Transportation Authority (Metro) is in receipt of the Draft Environmental Impact Report (DEIR) for the Jordan Downs Specific Plan. In response to the proposed rerouting of Metro Line 117 as part of an extension of Century Boulevard through the project site:

Response 7-1

No response to this comment is necessary as it only contains introductory information and is not a specific comment on the environmental analysis in Draft EIR.

Comment 7-2

1. Due to the fact Line 117 uses 103rd Street to serve the Blue Line station, it is imperative that the line remain on 103rd Street west of the project site. However, the line could potentially be rerouted via Grape Street to Century Boulevard in the project area;

Response 7-2

This comment is noted. Rerouting Metro Bus Line 117 is not included as part of the proposed project. The transit analysis included in the Draft EIR only states that transit in the project area “could” be rerouted, if Metro decides that it would prefer to go through the project site with the extension of Century Boulevard. There are no proposed closures or realigning of 103rd Street as part of the proposed project and Metro Bus Line 117 is anticipated to retain its current route.

Comment 7-3

2. Although such a reroute of Line 117 is likely feasible given that Metro Line 254 currently uses Grape Street, Metro cannot confirm feasibility until the streets are designed.

Response 7-3

This comment is noted. As previously stated, rerouting Metro Bus Line 117 is not included as part of the proposed project, and the Draft EIR only states that transit in the project area “could” be rerouted, if Metro decides that it would prefer to go through the project site with the extension of Century Boulevard. The analysis in the EIR is conducted under the assumption that current bus routing will remain, as any rerouting would be speculative and not under the control of the applicant.

Comment 7-4

In addition, further study would be needed to determine the feasibility of bus turns at Grape & Century;

Response 7-4

This comment is noted. Rerouting Metro Bus Line 117 is not included as part of the proposed project.

Comment 7-5

3. Assuming the reroute of Line 117 is feasible, bus stops at Century & Grape may be included. Depending on where these stops would be situated, several issues could arise including potential impacts on nearby residences on Grape Street, a danger from a potential increase in jaywalking, and potentially inadequate bus turning radii. In order to ensure the proper location of bus stops at this location, more details are needed regarding the extension of Century Boulevard, including the following:

- Number of traffic lanes in each direction
- Will there be a left turn pocket on westbound Century at Grape?

Response 7-5

This comment is noted. Details regarding the extension of Century Boulevard will be provided to Metro once design of the roadway has been finalized.

Comment 7-6

4. This reroute would cause the abandonment of four stops on 103rd Street in each direction including those that currently serve Jordan High School. As a result, stops at Century at roughly Juniper should be included as part of the reroute. The project sponsor should coordinate with LAUSD/Jordan High School to obtain their concurrence and ensure that students have access from the north side of campus to the bus stops near this location. A new school gate may be required;

Response 7-6

This comment is noted. As previously stated, rerouting Metro Bus Line 117 is not included as part of the proposed project. The Draft EIR only states that transit in the project area “could” be rerouted, if Metro decides that it would prefer to go through the project site with the extension of Century Boulevard. There are no proposed closures or realigning of 103rd Street as part of the proposed project. HACLA would coordinate with LAUSD/Jordan High School to obtain their concurrence and ensure that students have access from the north side of campus to the bus stops near this location if Metro decides to reroute Bus Line 117 once design of the roadway has been finalized.

Comment 7-7

5. The resulting new intersection of Century and Alameda will need a traffic signal to ensure safe transit operations.

Response 7-7

The existing Alameda Street (West)/Tweedy Boulevard intersection is already signalized on three sides. Upon implementation of the proposed project, this intersection will become the Alameda Street/Century Boulevard intersection and a signal for cars approaching from the west (eastbound) will be installed. This is part of the design of the proposed project which is discussed in Section IV.P Traffic and Transportation of the Draft EIR.

Comment 7-8

6. Evidence that in addition to Metro, all affected Municipal transit operators received the NOP for the Draft EIR;

Response 7-8

The Los Angeles Department of City Planning notified LADOT and Metro of the proposed project.

Comment 7-9

7. Estimated project transit trip generation for both morning and evening peak periods;

Response 7-9

Table IV.P-7 in the Draft EIR presents the estimated project trip generation, including, as the 15 percent transit credit, the estimated daily transit trip generation and estimated transit use during both morning and evening peak periods. In summary, using LADOT methodology, there are 2,497 daily projected transit trips, with 210 in the AM peak hour, and 223 in the PM peak hour.

Comment 7-10

8. Documentation on the assumptions/analyses used to determine the number and percentage of trips assigned to transit.

Response 7-10

According to the Traffic Analysis Memorandum in Appendix A of this Final EIR, the Draft 2010 Congestion Management Program for Los Angeles County provides guidelines in the estimation of transit trips. The LADOT Traffic Study Policies and Procedures also provide guidelines on vehicle trip credits due to transit usage. During the scoping process, a Memorandum of Understanding (MOU) with LADOT was developed, which provides approval on the assumptions and content of the traffic study. As part of this process, LADOT allowed a 15 percent transit trip credit for the project, based on proximity of the project to transit (bus and rail). Table IV.P-7 in the Draft EIR shows the projected transit trips. Using LADOT methodology, there are 2,497 daily projected transit trips, with 210 in the AM peak hour, and 223 in the PM peak hour.

Comment 7-11

Metro Bus Operations Control Special Events Coordinator should be contacted at 213-922-4632 regarding construction activities that may impact Metro bus lines.

Response 7-11

This comment is noted, and no further response to this comment is necessary as it is not a specific comment on the environmental analysis in the Draft EIR.

Comment 7-12

Other Municipal Bus Service Operators including LADOT may also be impacted and therefore should be included in construction outreach efforts.

Response 7-12

This comment is noted. All affected municipal bus service operators have been contacted and informed of the proposed project. LADOT has reviewed and approved the traffic study.

Comment 7-13

If you have any questions regarding this response, please call me at 213-922-2836 or by email at hartwells@metro.net. Please send the Final EIR to the following address:

Metro CEQA Review Coordination
One Gateway Plaza, MS 99-23-2
Los Angeles, CA 90012-2952
Attn: Scott Hartwell

Response 7-13

This comment is noted, and no further response to this comment is necessary as it is not a specific comment on the environmental analysis in the Draft EIR.



South Coast
Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

E-mailed: January 4, 2011
Adam.Villani@lacity.org

January 4, 2011

Mr. Adam Villani
Los Angeles Department of City Planning
200 North Spring Street, Room 750
Los Angeles, CA 90012

**Review of the Draft Environmental Impact Report (Draft EIR)
for the Jordan Downs Urban Village Specific Plan**

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comment is intended to provide guidance to the lead agency and should be incorporated into the revised draft or final Environmental Impact Report (draft or final EIR) as appropriate.

8-1

Based on a review of the draft EIR the AQMD staff is concerned about potential health risk impacts to future sensitive receptors (i.e., residences) within the project boundaries. Specifically, Figure II-3 in the draft EIR indicates that residential uses (i.e., RAS4-Residential Accessory Zone) may be placed adjacent to existing manufacturing (i.e., CM2-Commercial Manufacturing Zone) uses. Therefore, the AQMD staff recommends that the lead agency require that any future project with residential uses in the RAS4 zone conduct a health risk assessment if the proposed project is located adjacent to manufacturing or other industrial uses that contain sources of toxic air contaminants.

8-2

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the lead agency to address these issues and any

8-3

other questions regarding air quality that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

8-3
(cont.)

Sincerely,



Ian MacMillan

Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

Attachment

IM:DG

LAC101123-04
Control Number

LETTER 8

January 4, 2011

Ian MacMillan, Program Supervisor, CEQA Inter-Governmental Review
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765-4182

Comment 8-1

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comment is intended to provide guidance to the lead agency and should be incorporated into the revised draft or final Environmental Impact Report (draft or final EIR) as appropriate.

Response 8-1

This comment is noted. No response to this comment is necessary as it only contains introductory information and is not a specific comment on the environmental analysis in the Draft EIR.

Comment 8-2

Based on a review of the draft EIR the AQMD staff is concerned about potential health risk impacts to future sensitive receptors (i.e., residences) within the project boundaries. Specifically, Figure II-3 in the draft EIR indicates that residential uses (i.e., RAS4-Residential Accessory Zone) may be placed adjacent to existing manufacturing (i.e., CM2-Commercial Manufacturing Zone) uses. Therefore, the AQMD staff recommends that the lead agency require that any future project with residential uses in the RAS4 zone conduct a health risk assessment if the proposed project is located adjacent to manufacturing or other industrial uses that contain sources of toxic air contaminants.

Response 8-2

A Health Risk Assessment (HRA) has been prepared for the proposed project and is included in Appendix B of this Final EIR. The results of the HRA indicate that the carcinogenic, chronic, or acute risk at new residential land uses would not exceed the risk thresholds. It is anticipated that the maximum carcinogenic risk over a 70-year exposure period would be 7.0E-06 persons in one million. This risk is less than the ten persons in one million significance threshold. In addition, the Hazard Index would be less than one at each toxicological endpoint. Thus, chronic and acute risk would also result in less-than-significant impacts.

Comment 8-3

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the lead agency to address these issues and any other questions regarding air quality that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Response 8-3

AQMD resources were used during the preparation of the HRA, and AQMD staff has been provided a copy of the HRA and the Final EIR.

Letter No. 9

355 South Grand Avenue
Los Angeles, California 90071-1560
Tel: +1.213.485.1234 Fax: +1.213.891.8763
www.lw.com

LATHAM & WATKINS^{LLP}

December 31, 2010

VIA EMAIL

Mr. Adam Villani
Environmental Review Coordinator
Los Angeles Department of City Planning
200 North Spring Street, Room 750
Los Angeles, CA 90012
email: Adam.Villani@lacity.org

FIRM / AFFILIATE OFFICES
Abu Dhabi Moscow
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Doha Paris
Dubai Riyadh
Frankfurt Rome
Hamburg San Diego
Hong Kong San Francisco
Houston Shanghai
London Silicon Valley
Los Angeles Singapore
Madrid Tokyo
Milan Washington, D.C.

File No. 048010-0000

Re: Comments on Draft EIR for Jordan Downs Specific Plan
(No. ENV-2010-0032-EIR; State Clearinghouse No. 2010021007)

Dear Mr. Villani:

On behalf of S&W Atlas Iron & Metal Company, Inc. (“Atlas”), we are writing to provide comments regarding the City of Los Angeles’ November 2010 Draft Environmental Impact Report (“EIR”) for the proposed Jordan Downs Specific Plan project (the “Project”). As part of the Project, the City and the Housing Authority of the City of Los Angeles (“HACLA”) have proposed annexing approximately 41.74 acres of land into the City that are currently located within unincorporated Los Angeles County. Some of this land contains privately-owned parcels with primarily industrial land uses located along Alameda Street, including Atlas’ scrap metal processing facility located at 10019-10035 South Alameda Street (the “Atlas Property”). Given the City’s stated goals of retaining and preserving existing industrial land uses, and the potential for the Project to introduce new and potentially conflicting residential and commercial land uses in close proximity to the Atlas Property and other existing industrial land uses, Atlas is seeking to ensure that its existing industrial uses are protected consistent with City policy, and that development of the Project will not result in significant and unmitigated environmental impacts under the California Environmental Quality Act (“CEQA”).

9-1

The Framework Element of the City’s General Plan sets forth the City’s objective and intent “to preserve industrial lands for the retention and expansion of existing and attraction of new industrial uses that provide job opportunities for the City’s residents.”¹ In order to implement that objective and intent, the Framework Element provides several policies concerning the retention of industrial land uses, including:

9-2

¹ See General Plan Framework Element, Chapter 3 (Land Use), Section 3 (Issue Two: Uses, Density, Characteristics (Industrial)).

- Policy 3.14.3: “Limit the introduction of new commercial and other non-industrial uses in existing commercial manufacturing zones to uses which support the primary industrial function of the location in which they are located.”
- Policy 3.14.7: “Consider the potential redesignation of non-industrial properties located adjacent to lands designated and developed with industrial uses for industrial purposes by amending the community plans or by conditional use permits . . .”
- Policy 3.14.9: “Initiate programs for lot consolidation and implement improvements to assist in the retention/expansion of existing and attraction of new industrial uses, where feasible.”

9-2
(cont.)

These policies demonstrate the City’s long-standing practice of seeking to preserve industrial land uses and avoiding the introduction of non-industrial land uses in existing industrial areas.

In addition, a January 3, 2008, joint memorandum prepared by the City Planning Department and the Community Redevelopment Agency (“CRA”) concerning the potential conversion of industrial land uses in the City to other uses reemphasized that “***the City’s adopted policy is to retain industrial land for job producing uses***, as established in the adopted General Plan Framework and Community Plans, reinforced in several Redevelopment Plans, and consistent with the Mayor’s economic development strategy.”² The joint memorandum was prepared based on the results of the City’s and CRA’s 24-month Industrial Land Use Policy Project (“ILUP”), which evaluated the viability of the City’s industrial districts that have faced pressures to convert to other uses. Although the Atlas Property and adjacent industrial lands were not evaluated in the ILUP due in part to their current location outside the City, the joint memorandum makes clear that industrial properties not evaluated in the ILUP should be preserved to provide employment and services that are essential to the City’s diversified economic base.³ Specifically, the joint memorandum and its accompanying attachments highlight that industrial jobs employ about 25 percent of the City’s total workforce, that these jobs generally pay higher average wages, and that the industrial sector is critically important to other sectors of the City’s economy through its support of the production of goods and services.⁴

9-3

The Atlas Property is located within an area of the County’s General Plan that is designated for “Major Industrial” land uses, and is zoned for “Heavy Manufacturing” uses. These designations allow for a broad range of industrial uses, including scrap metal processing yards such as the family-owned facility that Atlas has operated on the Atlas Property since 1949.

9-4

² See Los Angeles City Planning Department and CRA/LA Memorandum re Staff Direction Regarding Industrial Land Use and Potential Conversion to Residential or Other Uses (January 3, 2008), at p. 1 (emphasis in original).

³ See *id.* at pp. 1, 7.

⁴ See *id.* at Attachment B (Los Angeles’ Industrial Land: Sustaining a Dynamic City Economy (December 2007)), at pp. 15-16, 18.

It is exactly this type of long-standing industrial use that the City's Framework Element was designed to protect to ensure that a diversified economic base is maintained. Accordingly, should the Atlas Property and adjacent industrial lands be annexed into the City as part of the Project, it will be critically important for the City to take steps necessary to ensure that the existing industrial uses are protected and maintained.

Should the Atlas Property be annexed into the City without sufficient protections to ensure the continuation of its existing industrial uses, that would create an inconsistency with the General Plan Framework Element and City policy that would result in a significant adverse land use impact. Further, even if Atlas' existing industrial land uses are protected in the annexation process, the Project's proposed introduction of new residential uses and commercial uses in close proximity to the Atlas Property creates a very high risk for conflicts between the existing industrial uses and future residents and businesses, so appropriate mitigations are required.

9-4
(cont.)

Atlas appreciates that representatives from HACLA, the City Planning Department, and the Mayor's office have met with Atlas' representatives to discuss these concerns. Atlas appreciates that those representatives have confirmed that the Project will be undertaken in such a way as to protect the existing industrial uses. To ensure that this understanding is incorporated as part of the Project, Atlas also understands that the following actions will be taken.

9-5

(1) Pursuant to the intent to preserve Atlas' current operations, the Atlas Property will be pre-zoned to preserve all of Atlas' current operations and to ensure that the new zoning allows Atlas' current operations indefinitely and by-right.

9-6

(2) Pursuant to the intent to allow Atlas to be a good neighbor and continue its existing business operations, and to avoid future conflicts and foster the comfort of future residents of Jordan Downs:

9-7

a. HACLA and the City will re-configure the Project's layout so that the least-sensitive uses are located closest to the Atlas Property;

9-8

b. HACLA and the City will adopt any feasible buffer areas to separate the proposed new uses from the existing industrial uses;

9-9

c. The City will condition residential development so that no exterior windows or balconies face the Atlas Property, to protect the new residents from industrial noise, vibrations, and odors, and to protect Atlas from complaints;

9-10

d. HACLA and the City will adopt any feasible sound walls, sound-insulated windows, and other potential mitigations to protect the new residents from industrial noise and vibrations, and to protect Atlas from complaints; and

9-11

e. The City will notify in advance all future residents and businesses near the Atlas Property of the industrial operations that occur nearby, warning them of potential noise, vibrations, and odors, and will

9-12

include in rental agreements, leases, or similar documents a provision stating that each resident/tenant understands and accepts that they will be located near long-standing industrial land uses that may cause noise, vibrations, and odors.

9-12
(cont.)

(3) Pursuant to the intent to allow Atlas to continue its business operations unencumbered by the proposed annexation into the City, the City will make the annexation cost-neutral for Atlas with regard to City taxes and fees.

9-13

(4) Pursuant to the intent to allow Atlas to continue its business operations unencumbered by the proposed annexation into the City, the City will ensure that Atlas will be able to continue its existing operations under City laws and regulations and will ensure that all permits from County agencies that allow Atlas to operate in the County will be transferred to the City and all appropriate City agencies.

9-14

If each of these steps are implemented as binding Project obligations, Atlas believes that the existing industrial uses will be adequately protected, including from potential conflicts with future Project residents and businesses. However, if these steps are not implemented, then Atlas believes that the Project would result in significant environmental impacts under CEQA that have not been adequately studied and mitigated in the Draft EIR, and would request further CEQA assessment and mitigations and re-circulation of a more thorough revised Draft EIR that more accurately studies the Project's impacts on nearby industrial land uses and on the Project's future residents, especially in the areas of aesthetics, noise, land use, and air quality.

9-15

We appreciate your consideration of these issues. Please do not hesitate to contact me at (213) 891-8204 with any questions or if you would like any additional information.

Very truly yours,

James L. Arnone

James L. Arnone
of LATHAM & WATKINS LLP

cc: Mr. Gary Weisenberg, S&W Atlas Iron & Metal Company, Inc
Mr. Steve Afriat, Afriat Consulting Group, Inc.
Mr. Aaron Green, Afriat Consulting Group, Inc.
Mr. Duncan Joseph Moore, Latham & Watkins LLP

LETTER 9

December 31, 2010

James Arnone
Latham & Watkins
355 South Grand Avenue
Los Angeles, CA 90071-1560

Comment 9-1

On behalf of S&W Atlas Iron & Metal Company, Inc. (“Atlas”), we are writing to provide comments regarding the City of Los Angeles’ November 2010 Draft Environmental Impact Report (“EIR”) for the proposed Jordan Downs Specific Plan project (the “Project”). As part of the Project, the City and the Housing Authority of the City of Los Angeles (“HACLA”) have proposed annexing approximately 41.74 acres of land into the City that are currently located within unincorporated Los Angeles County. Some of this land contains privately-owned parcels with primarily industrial land uses located along Alameda Street, including Atlas’ scrap metal processing facility located at 10019-10035 South Alameda Street (the “Atlas Property”). Given the City’s stated goals of retaining and preserving existing industrial land uses, and the potential for the Project to introduce new and potentially conflicting residential and commercial land uses in close proximity to the Atlas Property and other existing industrial land uses, Atlas is seeking to ensure that its existing industrial uses are protected consistent with City policy, and that development of the Project will not result in significant and unmitigated environmental impacts under the California Environmental Quality Act (“CEQA”).

Response 9-1

This comment correctly describes the proposed Annexation Area, which includes privately-owned parcels located along Alameda Street with primarily industrial land uses, including Atlas’ scrap metal processing facility. Impacts related to the proposed project’s proximity to the existing industrial land uses have been fully analyzed in Section IV.J Land Use and Planning in the Draft EIR and have been determined to be less than significant with the implementation of mitigation measures. The project area is not solely an industrial area. Jordan High School is located immediately adjacent to the existing industrial uses along Alameda Street and the residential uses in the immediate vicinity. The proposed Commercial Manufacturing (CM) zoning designation is more appropriate than an industrial zoning designation considering all of the land uses in the project area, and the mitigation measures required by the EIR would protect and ensure compatibility between existing industrial land uses along Alameda Street and the residential and commercial components of the proposed project.

Comment 9-2

The Framework Element of the City’s General Plan sets forth the City’s objective and intent “to preserve industrial lands for the retention and expansion of existing and attraction of new industrial uses that provide job opportunities for the City’s residents.”¹ In order to implement that objective and intent, the Framework Element provides several policies concerning the retention of industrial land uses, including:

- Policy 3.14.3: “Limit the introduction of new commercial and other non-industrial uses in existing commercial manufacturing zones to uses which support the primary industrial function of the location in which they are located.”

¹See General Plan Framework Element, Chapter 3 (Land Use), Section 3 (Issue Two: Uses, Density, Characteristics (Industrial))

- Policy 3.14.7: “Consider the potential redesignation of non-industrial properties located adjacent to lands designated and developed with industrial uses for industrial purposes by amending the community plans or by conditional use permits . . .”
- Policy 3.14.9: “Initiate programs for lot consolidation and implement improvements to assist in the retention/expansion of existing and attraction of new industrial uses, where feasible.”

These policies demonstrate the City’s long-standing practice of seeking to preserve industrial land uses and avoiding the introduction of non-industrial land uses in existing industrial areas.

Response 9-2

While the City’s Framework Element policies cited in the comment seek to preserve industrial lands, the project area is not solely an industrial area, and there are currently a variety of land uses in close proximity to one another. Therefore, the policies cited in the comments are not specifically relevant to the proposed project. For example, Jordan High School is located immediately adjacent to the existing industrial uses along Alameda Street and residential uses are also in the immediate area. In addition, the 22-acre HACLA-owned, industrial zoned property within the County of Los Angeles is currently vacant, underutilized, and in need of reinvestment. The proposed CM zoning designation for this property, the Atlas property, and the other industrial zoned properties along Alameda Street would accommodate a range of new commercial and limited manufacturing uses that are more compatible with the existing Jordan High School and the residential uses in the immediate vicinity and serve as a buffer between these sensitive uses and the remaining industrial uses along Alameda Street. Mitigation Measures **AE5** through **AE9** in Section IV.A Aesthetics, Mitigation Measures **AQ19** through **AQ24** in Section IV.C Air Quality, and Mitigation Measures **N11** through **N15** in Section IV.L Noise and Vibration in the Draft EIR are recommended to ensure land use compatibility as the existing industrial uses along Alameda Street would be permitted to continue operating.

Comment 9-3

In addition, a January 3, 2008, joint memorandum prepared by the City Planning Department and the Community Redevelopment Agency (“CRA”) concerning the potential conversion of industrial land uses in the City to other uses reemphasized that “the City’s adopted policy is to retain industrial land for job producing uses, as established in the adopted General Plan Framework and Community Plans, reinforced in several Redevelopment Plans, and consistent with the Mayor’s economic development strategy.”² The joint memorandum was prepared based on the results of the City’s and CRA’s 24-month Industrial Land Use Policy Project (“ILUP”), which evaluated the viability of the City’s industrial districts that have faced pressures to convert to other uses. Although the Atlas Property and adjacent industrial lands were not evaluated in the ILUP due in part to their current location outside the City, the joint memorandum makes clear that industrial properties not evaluated in the ILUP should be preserved to provide employment and services that are essential to the City’s diversified economic base.³ Specifically, the joint memorandum and its accompanying attachments highlight that industrial jobs employ about 25 percent of the City’s total workforce, that these jobs generally pay higher average wages, and that the industrial sector is critically important to other sectors of the City’s economy through its support of the production of goods and services.⁴

²See Los Angeles City Planning Department and CRA/LA Memorandum re Staff Direction Regarding Industrial Land Use and Potential Conversion to Residential or Other Uses (January 3, 2008), at p.1 (emphasis in original).

³See *Id.* at pp. 1, 7.

⁴See *Id.* at Attachment B (Los Angeles’ Industrial Lan: Sustaining a Dynamic City Economy (December 2007)), at pp. 15-16, 18.

Response 9-3

While industrial zoned areas offer employment opportunities, create and support jobs in other business sectors, and generate taxes, the proposed CM zoning designation would also offer employment opportunities and accommodate new commercial and limited manufacturing uses. Furthermore, as discussed above in Response 9-2, the project area is not solely an industrial area. Jordan High School is located immediately adjacent to the existing industrial uses along Alameda Street and the residential uses in the immediate vicinity. The proposed CM zoning designation is more appropriate than an industrial zoning designation considering all of the land uses in the project area. Nonetheless, the existing industrial uses along Alameda Street would be permitted to continue operating until there is a change of use.

Comment 9-4

The Atlas Property is located within an area of the County's General Plan that is designated for "Major Industrial" land uses, and is zoned for "Heavy Manufacturing" uses. These designations allow for a broad range of industrial uses, including scrap metal processing yards such as the family-owned facility that Atlas has operated on the Atlas Property since 1949. It is exactly this type of long-standing industrial use that the City's Framework Element was designed to protect to ensure that a diversified economic base is maintained. Accordingly, should the Atlas Property and adjacent industrial lands be annexed into the City as part of the Project, it will be critically important for the City to take steps necessary to ensure that the existing industrial uses are protected and maintained.

Should the Atlas Property be annexed into the City without sufficient protections to ensure the continuation of its existing industrial uses that would create an inconsistency with the General Plan Framework Element and City policy that would result in a significant adverse land use impact. Further, even if Atlas' existing industrial land uses are protected in the annexation process, the Project's proposed introduction of new residential uses and commercial uses in close proximity to the Atlas Property creates a very high risk for conflicts between the existing industrial uses and future residents and businesses, so appropriate mitigations are required.

Response 9-4

As discussed above in Responses 9-2 and 9-3, the proposed CM zoning designation would accommodate a range of new commercial and limited manufacturing uses that would offer employment opportunities which would be more compatible with Jordan High School and the residential uses in the immediate vicinity. Furthermore, the existing Atlas scrap metal processing facility and the other existing industrial uses along Alameda Street would be permitted to continue operating until there is a change of use. The environmental analysis included in Section IV.J Land Use and Planning (pages IV.J-37 and IV.J-38) in the Draft EIR determined that with implementation of Mitigation Measures **AE5** through **AE9** in Section IV.A Aesthetics, Mitigation Measures **AQ19** through **AQ24** in Section IV.C Air Quality, and Mitigation Measures **N11** through **N15** in Section IV.L Noise and Vibration, impacts would be less than significant. Additional mitigation measures are not warranted.

Comment 9-5

Atlas appreciates that representatives from HACLA, the City Planning Department, and the Mayor's office have met with Atlas' representatives to discuss these concerns. Atlas appreciates that those representatives have confirmed that the proposed project will be undertaken in such a way as to protect the existing industrial uses. To ensure that this understanding is incorporated as part of the Project, Atlas also understands that the following actions will be taken.

Response 9-5

This comment is noted, and no further response to this comment is necessary as it is not a specific comment on the environmental analysis in Draft EIR.

Comment 9-6

- (1) Pursuant to the intent to preserve Atlas' current operations, the Atlas Property will be pre-zoned to preserve all of Atlas' current operations and to ensure that the new zoning allows Atlas' current operations indefinitely and by-right.

Response 9-6

Upon implementation, the Atlas property would be zoned Commercial Manufacturing (CM). The CM zone allows a range of commercial and limited manufacturing uses. Atlas's current operations and the other existing industrial uses along Alameda Street would be permitted to continue operating until there is a change of use. This comment is noted and will be provided to the decision-makers for consideration.

Comment 9-7

- (2) Pursuant to the intent to allow Atlas to be a good neighbor and continue its existing business operations, and to avoid future conflicts and foster the comfort of future residents of Jordan Downs:

Response 9-7

This comment introduces Atlas's understanding of how HACLA's and the City intend to avoid conflicts between the Atlas Property and the future residents of Jordan Downs. Mitigation Measures **AE5** through **AE9** in Section IV.A Aesthetics, Mitigation Measures **AQ19** through **AQ24** in Section IV.C Air Quality, and Mitigation Measures **N11** through **N15** in Section IV.L Noise and Vibration have been included in the Draft EIR to reduce impacts to a less-than-significant level. The analyses in the Draft EIR demonstrates that impacts related to land use, aesthetics, air quality, noise and vibration impacts, after mitigation, are less than significant. Therefore, additional mitigation measures or project design changes are not warranted.

Comment 9-8

- a. HACLA and the City will re-configure the Project's layout so that the least-sensitive uses are located closest to the Atlas Property;

Response 9-8

Refer to Response 9-7. Mitigation Measures **AQ19** through **AQ24** in Section IV.C Air Quality, and Mitigation Measures **N11** through **N15** in Section IV.L Noise and Vibration in the Draft EIR have been included in the Draft EIR to reduce impacts to the residential uses closest to Atlas to a less-than-significant level.

Comment 9-9

- b. HACLA and the City will adopt any feasible buffer areas to separate the proposed new uses from the existing industrial uses;

Response 9-9

Refer to Response 9-7. The proposed project currently includes a buffer area between the proposed residential uses and the existing industrial uses; however, this comment is noted and will be provided to the decision-makers for consideration.

Comment 9-10

- c. The City will condition residential development so that no exterior windows or balconies face the Atlas Property, to protect the new residents from industrial noise, vibrations, and odors, and to protect Atlas from complaints;

Response 9-10

Refer to Response 9-7. The analysis included in the Draft EIR determined that impacts related to noise, vibration and odor were less than significant with mitigation. Mitigation Measures **N11** through **N15** in Section IV.L Noise and Vibration have been recommended in the Draft EIR to reduce noise and vibration impacts to a less-than-significant level. Therefore, additional mitigation measures are not warranted. However, this comment is noted and will be provided to the decision-makers for consideration.

Comment 9-11

- d. HACLA and the City will adopt any feasible sound walls, sound-insulated windows, and other potential mitigations to protect the new residents from industrial noise and vibrations, and to protect Atlas from complaints; and

Response 9-11

Refer to Response 9-7. Mitigation Measures **N11** through **N15** in Section IV.L Noise and Vibration have been recommended to reduce noise and vibration impacts to a less-than-significant-level. Additional mitigation measures are not warranted. However, this comment is noted and will be provided to the decision-makers for consideration.

Comment 9-12

- e. The City will notify in advance all future residents and businesses near the Atlas Property of the industrial operations that occur nearby, warning them of potential noise, vibrations, and odors, and will include in rental agreements, leases, or similar documents a provision stating that each resident/tenant understands and accepts that they will be located near long-standing industrial land uses that may cause noise, vibrations, and odors.

Response 9-12

Refer to Response 9-7. The analyses in the Draft EIR demonstrates that impacts related to land use, aesthetics, air quality, noise and vibration impacts, after mitigation, are less than significant. Therefore, additional mitigation measures are not warranted. However, this comment is noted and will be provided to the decision-makers for consideration.

Comment 9-13

- (3) Pursuant to the intent to allow Atlas to continue its business operations unencumbered by the proposed annexation into the City, the City will make the annexation cost-neutral for Atlas with regard to City taxes and fees.

Response 9-13

Refer to Response 9-7. No response to this comment is necessary as it is not a specific comment on the environmental analysis in Draft EIR. However, this comment is noted and will be provided to the decision-makers for consideration.

Comment 9-14

- (4) Pursuant to the intent to allow Atlas to continue its business operations unencumbered by the proposed annexation into the City, the City will ensure that Atlas will be able to continue its existing operations under City laws and regulations and will ensure that all permits from County agencies that allow Atlas to operate in the County will be transferred to the City and all appropriate City agencies.

Response 9-14

Refer to Response 9-7. No response to this comment is necessary as it is not a specific comment on the environmental analysis in Draft EIR. However, this comment is noted and will be provided to the decision-makers for consideration.

Comment 9-15

If each of these steps are implemented as binding project obligations, Atlas believes that the existing industrial uses will be adequately protected, including from potential conflicts with future Project residents and businesses. However, if these steps are not implemented, then Atlas believes that the Project would result in significant environmental impacts under CEQA that have not been adequately studied and mitigated in the Draft EIR, and would request further CEQA assessment and mitigations and re-circulation of a more thorough revised Draft EIR that more accurately studies the Project's impacts on nearby industrial land uses and on the Project's future residents, especially in the areas of aesthetics, noise, land use, and air quality.

We appreciate your consideration of these issues. Please do not hesitate to contact me at (213) 891-8204 with any questions or if you would like any additional information.

Response 9-15

This comment is noted and will be provided to the decision-makers for consideration. Refer to Response 9-7. Refer also to Sections IV.A Aesthetics, IV.C Air Quality, IV.J Land Use and Planning, and IV.L Noise and Vibration of the Draft EIR for a detailed discussion of impacts related to these environmental topic areas.



December 30, 2010

Submitted electronically

Louie Rodriguez
City of Los Angeles
Department of City Planning, Community Planning Bureau
200 N. Spring Street, Room 667
Los Angeles, CA 90012
Email: louie.rodriguez@lacity.org

Re: Jordan Downs Specific Plan—Draft EIR (ENV-2010-32-EIR)

Dear Mr. Rodriguez:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft EIR for the Jordan Downs Specific Plan Project. The Los Angeles Conservancy is the largest local preservation organization in the United States, with about 6,000 members. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural heritage of Los Angeles County through advocacy and education. We submit the following comments to ensure that potential impacts to historic resources are considered in the Draft EIR.

10-1

A key policy under the California Environmental Quality Act (CEQA) is the lead agency's duty to "take all action necessary to provide the people of this state with...historic environmental qualities...and preserve for future generations...examples of major periods of California history."¹ Courts often refer to the EIR as "the heart" of CEQA, providing decision makers with an in-depth review of projects with potentially significant environmental impacts and analyzing alternatives that would reduce or avoid these impacts.

The Draft EIR, specifically the Cultural Resources Assessment, provides only a brief and cursory review of Jordan Downs in terms of a larger context of public housing within greater Los Angeles. Based on this very limited level of research and field survey, the assessment finds Jordan Downs to lack significance or qualify as a historic property.

10-2

The Conservancy strongly believes a greater level of research and the development of a broader context of early public housing within Los Angeles – including the role of Jordan Downs – is necessary as part of this project and CEQA. Without this base level of analysis, there is no way to fully understand Jordan Downs and evaluate its potential significance as a historic resource.

¹ Public Resources Code 21001(b), (c).

Without proper documentation and determination of a resource's potential historic status under CEQA guidelines, the lead agency lacks sufficient information to make an informed decision about the project and possible adverse impacts. We urge that a broader context of public housing be undertaken and Jordan Downs reevaluated for listing in the California Register before any action is taken on the Final EIR.

10-2
(cont.)

Thank you for the opportunity to comment on the Draft EIR for the Jordan Downs Specific Plan Project. Please feel free to contact me at (213) 430 4203 or afine@laconservancy.org should you have any questions.

Sincerely,



Adrian Scott Fine
Directory of Advocacy

cc: Adam Villani, Environmental Review Section, City of Los Angeles
Ken Bernstein, Office of Historic Resources, City of Los Angeles

Letter 10

December 30, 2010

Adrian Scott Fine
Los Angeles Conservancy
523 West Sixth Street, Suite 826
Los Angeles, CA 90014

Comment 10-1

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft EIR for the Jordan Downs Specific Plan Project. The Los Angeles Conservancy is the largest local preservation organization in the United States, with about 6,000 members. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural heritage of Los Angeles County through advocacy and education. We submit the following comments to ensure that potential impacts to historic resources are considered in the Draft EIR

Response 10-1

No response to this comment is necessary as it only contains introductory information and is not a specific comment on the environmental analysis in Draft EIR.

Comment 10-2

A key policy under the California Environmental Quality Act (CEQA) is the lead agency's duty to *"take all action necessary to provide the people of this state with ... historic environmental qualities ... and preserve for future generations ... examples of major periods of California history."*¹ Courts often refer to the EIR as "the heart" of CEQA, providing decision makers with an in-depth review of projects with potentially significant environmental impacts and analyzing alternatives that would reduce or avoid these impacts.

The Draft EIR, specifically the Cultural Resources Assessment, provides only a brief and cursory review of Jordan Downs in terms of a larger context of public housing within greater Los Angeles. Based on this very limited level of research and field survey, the assessment finds Jordan Downs to lack significance or qualify as a historic property.

The Conservancy strongly believes a greater level of research and the development of a broader context of early public housing within Los Angeles -including the role of Jordan Downs-is necessary as part of this project and CEQA. Without this base level of analysis, there is no way to fully understand Jordan Downs and evaluate its potential significance as a historic resource.

Without proper documentation and determination of a resource's potential historic status under CEQA guidelines, the lead agency lacks sufficient information to make an informed decision about the project and possible adverse impacts. We urge that a broader context of public housing be undertaken and Jordan Downs reevaluated for listing in the California Register before any action is taken on the Final EIR.

Thank you for the opportunity to comment on the Draft EIR for the Jordan Downs Specific Plan Project. Please feel free to contact me at (213) 430 4203 or afine@laconservancy.org should you have any questions.

¹Public Resources Code 21001(b),(c).

Response 10-2

Page & Turnbull has prepared a Historic Resources Report to supplement the Cultural Resources Assessment referenced in the Draft EIR. The supplemental Historic Resources Report is included as Appendix C of this Final EIR. The Historic Resources Report addresses the concerns raised in the comment and reviews the historic significance of Jordan Downs in the larger historic context of early public housing and garden apartment complexes in Los Angeles. The supplemental Historic Resources Report substantiates the findings in the Draft EIR that Jordan Downs is not eligible for listing in the National or California Registers, nor as a Historic-Cultural Monument, individually or as a contributor to a larger historic district or thematic district.



JERRY BROWN
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



January 4, 2011

Adam Villani
City of Los Angeles
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Subject: Jordan Downs Specific Plan
SCH#: 2010021007

Dear Adam Villani:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on January 3, 2011, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those proposed activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

11-1

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

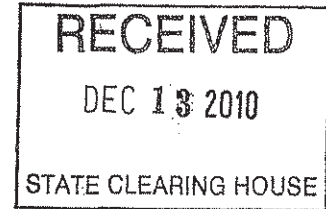
Enclosures
cc: Resources Agency

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-6251
Fax (916) 657-5390
Web Site www.nahc.ca.gov
e-mail: ds_nahc@pacbell.net



December 8, 2010



Mr. Louie Rodriguez, Project Manager
City of Los Angeles Department of City Planning
Community Planning Bureau
200 N. Spring street, Room 667
Los Angeles, CA 90012

*clear
1/3/11*

Sent by U.S. Mail
No. of Pages: 3

Re: Tribal Consultation Per Government Code §§ 65352.3, 65352.4 and 65560 (SB 18/Sacred Lands File Search) for Project- Jordan Downs Specific Plan/Maaster Plan, a Mixed-Use Development and State Clearinghouse No. 2010021007; located within the Southeast Los Angeles Community Plan Area (CPA); City of Los Angeles; Los Angeles County, California;

Dear Mr. Rodriguez:

Government Code §65352.3, .4 and .5 requires local governments to consult with California Native American tribes identified by the Native American Heritage Commission (NAHC) for the purpose of protecting, and/or mitigating impacts to cultural places that might be impacted by a General Plan or Specific or modifications thereof. Attached is a Native American Tribal Consultation list of tribes with traditional lands or cultural places located within the requested plan, the Area of Potential Effect (APE).

As a part of consultation, the NAHC recommends that local governments conduct record searches through the NAHC and California Historic Resources Information System (CHRIS) (Contact the Office of Historic Preservation at (916) 445-7000 to find the nearest CHRIS Information Center) to determine if there are any recorded archaeological sites are located within the area(s) affected by the proposed action, in the California Historical Resources Information System (CHRIS) inventory. The NAHC has knowledge of archaeological sites from within the APE that are recorded in the CHRIS inventory.

11-2

A NAHC Sacred Lands File search was conducted based on the project site n information included in your request; **Native American cultural resources were not identified** within the Area of Potential Effect (APE).. Early consultation with the Native American tribes on the attached list is the best way to find out if the proposed project may impact Native American cultural resources. Local governments should be aware that records searches do not preclude the existence of and the discovery of sacred sites or a cultural place of special religious and cultural significance to local Native American tribes. And please note that a tribe or tribal members may be the only source of information regarding the existence of a sacred site or a cultural place.

11-3

If you have any questions, please contact me at (916) 653-6251.

Sincerely,

Dave Singleton, Program Analyst

Cc: State Clearinghouse
Attachment: Native American Tribal Government Contacts

**Document Details Report
State Clearinghouse Data Base**

SCH# 2010021007
Project Title Jordan Downs Specific Plan
Lead Agency Los Angeles, City of

Type EIR Draft EIR
Description The proposed Specific Plan entails modifying the zoning and development guidelines for the project area. As envisioned in the HACLA Master Plan, the proposed project includes the demolition and replacement of the existing Jordan Downs public housing complex and the development of 1600 to 1800 new dwelling units to be built in a variety of residential building types, including townhouses and stacked flats in multiple and varied configurations

Lead Agency Contact

Name Adam Villani
Agency City of Los Angeles
Phone (213) 978-1472 **Fax**
email
Address 200 N. Spring Street, Room 750
City Los Angeles **State** CA **Zip** 90012

Project Location

County Los Angeles
City Los Angeles, City of
Region
Lat / Long 33° 56' 45.9" N / 118° 13' 56.2" W
Cross Streets 97th and Grape Streets
Parcel No. multiple parcels
Township **Range** **Section** **Base**

Proximity to:

Highways I-105
Airports
Railways Alameda Corridor
Waterways
Schools Jordan HS
Land Use Residential, Commercial, Industrial, Public Facility and Open Space

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

Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Game, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 7; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission; Department of Housing and Community Development

Date Received 11/18/2010 **Start of Review** 11/18/2010 **End of Review** 01/03/2011

Letter 11

January 4, 2010

Governors' Office of Planning and Research
State Clearinghouse and Planning Unit
1400 10th Street
P.O. Box 3044
Sacramento CA 95812-3044

Comment 11-1

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed the document. The review period closed on January 3, 2011, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

“A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation.”

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Response 11-1

This comment has been noted, and no further response to this comment is necessary. The Native American Heritage Commission's (NAHC) comments and corresponding responses are provided below in Comments and Responses 11-2 and 11-3.

Comment 11-2

Government Code §65352.3, .4 and .5 requires local governments to consult with California Native American tribes identified by the Native American Heritage Commission (NAHC) for the propose of protecting, and/or mitigating impacts to cultural places that might be impacted by a General Plan or Specific or modifications thereof. Attached is a Native American Tribal Consultation list of tribes with traditional lands or cultural places located within the requested plan, the Area of Potential Effect (APE).

As a part of consultation, the NAHC recommends that local governments conduct record searches through the NAHC and California Historic Resources Information System (CHRIS) (Contact the Office of Historic Preservation at (916) 445-7000 to find the nearest CHRIS Information Center) to determine if

there are any recorded archaeological sites are located within the area(s) affected by the proposed action, in the California Historical Resources information System (CHRIS) Inventory.

Response 11-2

The records search of archaeological sites was conducted at South Central Coastal Information Center (SCCIC). The results of the search, which are included in Section IV.E of the Draft EIR, indicate that there are three archaeological resource sites within one-half mile of the Specific Plan area; however, there are no reported archaeological finds within the Specific Plan area. As such, the Draft EIR concludes that it is unlikely that archaeological resources exist within in the Specific Plan area.

Comment 11-3

A NAHC Sacred Lands File search was conducted based on the project site information included in your request; **Native American cultural resources were not identified** within the Area of Potential Effect (APE). Early consultation with the Native American tribes on the attached list is the best way to find out if the proposed project may impact Native American cultural resources. Local governments should be aware that records searches do not preclude the existence of and the discovery of sacred sites or a cultural place of special religious and cultural significance to local Native American tribes. And please note that a tribe or tribal members may be the only source of information regarding the existence of a sacred site or cultural place.

Response 11-3

As indicated by the comment, the NAHC Sacred Lands File search indicates that no Native American cultural resources are located within the Specific Plan area. In addition, the chairpersons of the following Native American Tribes have been notified of the proposed project: Gabrielino-Tongva Tribe, Gabrielino-Tongva San Gabriel Band of Missions, Gabrielino-Tongva Nation, and Ti'At Society/Inter-Tribal Council of Pimu. The Department of City Planning has not been informed of any potential impacts to Native American cultural resources. Nonetheless, Mitigation Measures **CR2** and **CR3** require that if archaeological or paleontological resources are discovered during project construction activities, work in the area shall cease and deposits shall be treated in accordance with federal, State, and local guidelines.