

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

Project Information

Project Name: 433 Vermont Apartments

Responsible Entity: California Housing Finance Agency

Grant Recipient (if different than Responsible Entity):

State/Local Identifier: 18-011-S

Preparer: Matthew Long, Senior Environmental Scientist, Rincon Consultants, Inc.

Certifying Officer Name and Title: Tia Boatman Patterson, Executive Director, California Housing Finance Agency

Consultant (if applicable): Rincon Consultants, Inc.

Direct Comments to: Kevin Brown, Loan Administrator, California Housing Finance Agency – Multifamily Programs, KBrown@calhfa.ca.gov, (916) 326-8808

Project Location:

The project site is located at 433 S. Vermont Avenue, between 4th Street and 5th Street in the City of Los Angeles in Los Angeles County (see Appendix A).

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:

The project would involve the construction of a 72-unit senior housing apartment complex on an approximately 0.5-acre lot in an urban area in the City of Los Angeles. The complex would consist of one- and two-bedroom units for low-income seniors and special needs populations, and would include indoor and outdoor community space. The ground floor of the building would be designated as community recreation space to be operated and maintained by the YMCA. Fifty-seven apartments would be one-bedroom units, and the remaining 15 would be two-bedroom units. The building would be six stories (approximately 65 feet) tall and would include solar panels and “cool roof” features on the roof such as reflective paint, tiles, or shingles that would help reflect incident sunlight and decrease heat absorption. The project would also include two levels of subterranean parking with 79 parking spaces. A single 30-foot-wide driveway would enter the property at the northeastern corner off of S. Vermont Avenue (see Appendix B). Key energy saving elements included in the project include maximizing available efficiencies through using recycling materials during building construction, utilizing drought tolerant landscaping, installing a high efficiency irrigation system, installing an easily-accessible recycling area for tenants, providing electric car charging stations, and installing rainfall retention features to reduce off-site runoff. The site is currently owned by the County of Los Angeles.

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

The purpose of the proposed action is to increase the number of affordable senior housing units in the City of Los Angeles, which is an urbanized and built-out area in Los Angeles County, California. Implementation of the proposed action would add 72 units of affordable housing.

Existing Conditions and Trends [24 CFR 58.40(a)]:

The project site is a 0.5-acre property developed with one vacant building formerly occupied by the Los Angeles County Department of Parks and Recreation (LACDPR) and an associated surface parking lot. The site is flat with no substantial changes in elevation or topography, and is entirely paved. The site is located in a developed mixed-use area in the Wilshire Center/Koreatown community in the City of Los Angeles. Surrounding land uses include multi-family residential apartment complexes to the west, commercial uses to the north and south, and a mosque/religious center to the east (see Appendix A).

Funding Information

Grant Number	HUD Program	Insured Amount
N/A	Housing Finance Agency Risk Sharing - Existing:	\$6,500,000

	Section 542(c) - YHE	
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Estimated Total HUD Funded Amount: \$6,500,000

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]: \$49,674,404

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

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate. Citations to support the compliance determinations are listed below the following table and are cited in the ‘Compliance determinations’ column in parentheses “().”

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The closest airport is the Santa Monica Airport, located over nine miles west of the project site. The proposed project is not located within the regional planning zone (RPZ) for the Santa Monica Airport. (i) Additionally, the project would not involve construction of any structure equal to or greater than 150 feet in height, so would not constitute a safety hazard to aircraft and/or operations from an airport or heliport. The project would be in compliance with Airport Hazard requirements.
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The Coastal Barrier Resources Act of the United States (CBRA, Public Law 97-348), enacted October 18, 1982, designated various undeveloped coastal barriers, depicted by a set of maps adopted by law, for inclusion in the John H. Chafee Coastal Barrier Resources System (CBRS). Areas so designated were made ineligible for direct or indirect federal funding except for limited uses such as national security,

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1990 [16 USC 3501]		navigability, and energy exploration. CBRS areas extend along the coasts of the Atlantic Ocean and the Gulf of Mexico, Puerto Rico, the US Virgin Islands, and the Great Lakes and consist of 857 units. There are no CBRS areas on the Pacific Coast. Therefore, the provisions of the CBRA do not apply to the proposed project. (cc)
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The insurable property is not located in a Federal Emergency Management Agency (FEMA) designated Special Flood Hazard Area according to Flood Insurance Rate Map Number 06037C1610F dated September 26, 2008. The project site is located within Flood Zone X (unshaded), which represents areas outside of both the 100-year and 500-year floodplains. (v). The project would be in compliance with flood insurance requirements.
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5		
Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	Los Angeles is in the South Coast Air Basin (SCAB), which is a nonattainment area (Extreme level) for State and federal one-hour and eight-hour ozone ambient air quality standards (AAQS) (z), the State PM ₁₀ standards, and the state and federal PM _{2.5} AAQS standards (Serious level). (z) Air quality in the SCAB is managed and regulated by the South Coast Air Quality Management District (SCAQMD). The majority of ozone formation occurs when nitrogen oxides (NO _x), carbon monoxide (CO) and reactive organic gases (ROG), react in the atmosphere in the presence of sunlight. For this reason, NO _x , CO, and ROG are called ozone precursors and are relevant criteria pollutants to evaluate in areas in nonattainment for ozone AAQS. The Code of Federal Regulations (CFR) provides guidance to document Clean Air Act (CAA) Conformity Determination requirements. 40 CFR Part 93.153(b)(2) defines de minimis levels, which are the minimum thresholds for which a conformity

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		<p>determination must be performed for criteria pollutants based on the federal attainment status of the pollutant in the air basin. The federal de minimis threshold for ROG and NO_x in nonattainment areas that are not classified as serious, severe, or extreme, is 100 tons per year, or 550 pounds per day. The federal de minimis level for CO is 100 tons per year, or 550 pounds per day.</p> <p>SCAQMD provides stricter de minimis thresholds for pollutants within the basin as provided in Table 1. As shown in the table, some SCAQMD pollutant thresholds are lower than those of the CAA described above. These thresholds were used to evaluate potential air quality impacts generated by construction and/or operation of the proposed project.</p> <p style="text-align: center;">Table 1 SCAQMD Air Quality Significance Thresholds</p> <table border="1" data-bbox="753 1136 1417 1472"> <thead> <tr> <th>Pollutant</th> <th>Construction (lbs/day)</th> <th>Operation (lbs/day)</th> </tr> </thead> <tbody> <tr> <td>ROG</td> <td>75</td> <td>55</td> </tr> <tr> <td>NO_x</td> <td>100</td> <td>55</td> </tr> <tr> <td>CO</td> <td>550</td> <td>550</td> </tr> <tr> <td>SO_x</td> <td>150</td> <td>150</td> </tr> <tr> <td>PM₁₀</td> <td>150</td> <td>150</td> </tr> <tr> <td>PM_{2.5}</td> <td>55</td> <td>55</td> </tr> </tbody> </table> <p>The California Emissions Estimator Model (CalEEMod) version 2016.3.1 was used to quantify the project's construction and operational emissions, as reported in the Draft Environmental Impact Report (EIR) for the Vermont Corridor Project, of which the proposed project is a component (see Appendix C). Specifically, the results from the EIR for the Vermont Corridor Project, Site 3 (the proposed action), are reported in Tables 2 and 3 below. (j) Emissions generated during construction of the</p>	Pollutant	Construction (lbs/day)	Operation (lbs/day)	ROG	75	55	NO _x	100	55	CO	550	550	SO _x	150	150	PM ₁₀	150	150	PM _{2.5}	55	55
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		<p>proposed project are shown in Table 2. As shown, emissions generated during project construction would not exceed regional regulatory thresholds.</p> <p style="text-align: center;">Table 2 Daily Construction Emissions (lbs/day)</p> <table border="1" data-bbox="743 621 1435 982"> <thead> <tr> <th></th> <th>Demolition Phase</th> <th>Grading Phase</th> <th>Building Phase</th> <th>SCAQMD Threshold</th> <th>Exceeded ?</th> </tr> </thead> <tbody> <tr> <td>ROG</td> <td>1.07</td> <td>1.67</td> <td>15.37</td> <td>75</td> <td>No</td> </tr> <tr> <td>NO_x</td> <td>10.52</td> <td>29.89</td> <td>20.58</td> <td>100</td> <td>No</td> </tr> <tr> <td>CO</td> <td>8.55</td> <td>12.90</td> <td>19.19</td> <td>550</td> <td>No</td> </tr> <tr> <td>SO_x</td> <td>0.03</td> <td>0.07</td> <td>0.07</td> <td>150</td> <td>No</td> </tr> <tr> <td>PM₁₀</td> <td>1.35</td> <td>2.30</td> <td>2.36</td> <td>150</td> <td>No</td> </tr> <tr> <td>PM_{2.5}</td> <td>0.67</td> <td>1.13</td> <td>1.30</td> <td>55</td> <td>No</td> </tr> </tbody> </table> <p>Emissions generated during operation of the proposed project are shown in Table 3. These estimates account for the emissions generated by land uses currently within the project site that would be removed for development of the proposed project. Therefore, the estimates represent the net change in daily operational emissions after accounting for removal of emissions generated from current on-site land uses. As shown in the table, emissions associated with operation of the proposed project would not exceed regional regulatory thresholds.</p> <p style="text-align: center;">Table 3 Daily Operational Emissions (lbs/day)</p> <table border="1" data-bbox="743 1514 1395 1879"> <thead> <tr> <th></th> <th>Daily Operational Emissions</th> <th>SCAQMD Threshold</th> <th>Exceeded?</th> </tr> </thead> <tbody> <tr> <td>ROG</td> <td>4.10</td> <td>55</td> <td>No</td> </tr> <tr> <td>NO_x</td> <td>4.16</td> <td>55</td> <td>No</td> </tr> <tr> <td>CO</td> <td>15.94</td> <td>550</td> <td>No</td> </tr> <tr> <td>SO_x</td> <td>0.03</td> <td>150</td> <td>No</td> </tr> <tr> <td>PM₁₀</td> <td>2.52</td> <td>150</td> <td>No</td> </tr> <tr> <td>PM_{2.5}</td> <td>0.73</td> <td>55</td> <td>No</td> </tr> </tbody> </table>		Demolition Phase	Grading Phase	Building Phase	SCAQMD Threshold	Exceeded ?	ROG	1.07	1.67	15.37	75	No	NO _x	10.52	29.89	20.58	100	No	CO	8.55	12.90	19.19	550	No	SO _x	0.03	0.07	0.07	150	No	PM ₁₀	1.35	2.30	2.36	150	No	PM _{2.5}	0.67	1.13	1.30	55	No		Daily Operational Emissions	SCAQMD Threshold	Exceeded?	ROG	4.10	55	No	NO _x	4.16	55	No	CO	15.94	550	No	SO _x	0.03	150	No	PM ₁₀	2.52	150	No	PM _{2.5}	0.73	55	No
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		Neither construction nor operational emissions would exceed the federal or SCAQMD de minimis thresholds for ROG, NO _x , or CO, and the project would be in compliance with the CAA.
Coastal Zone Management Coastal Zone Management Act, sections 307(c) & (d)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	The project site is not within a Coastal Zone Management (CZM) area and does not involve the acquisition of undeveloped land in a CZM area. The project site is located approximately 12 miles east of the nearest coastline (Appendix A). The project would be in compliance with the Coastal Zone Management Act.
Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	<p>EFI Global completed a Phase I Environmental Site Assessment (ESA) for the project site in October 2017 (see Appendix D). No contaminated properties were found within 100 feet of the project site, and the contaminated sites in the project area listed in the local regulatory database report were not determined to pose a significant threat to the subject property.</p> <p>Per the State Water Resources Control Board (SWRCB) Geotracker database (g) and the Department of Toxic Substances Control EnviroStor database (b), both searched April 17, 2018, there are 71 Leaking Underground Storage Tank (LUST) cleanup sites within a one-mile radius of the project site. Seven of the sites are open. The open LUST cleanup sites include:</p> <ul style="list-style-type: none"> • Unocal #0457 (T0603700445) • Former Arco #1869 (T0603700630) • Fisher Property (T0603732362) • Wilshire Car Wash (T0603700634) • 76 Station #2124 (T0603700465) • International Tire (T10000004605) • Phillip 66 5776 (T10000010816) <p>The Unocal, Former Arco, Fisher Property, and 76 Station sites are all under remediation with the most recent site being designated for remediation as of 2016. The Wilshire Car Wash site is in the final</p>

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		<p>verification monitoring stages as of 2016 after being deemed eligible for closure. The remaining sites are in the initial site assessment phase where the risk characterization and evaluation of the site is assessed prior to remediation activities.</p> <p>There are also 27 hazardous cleanup sites within a one-mile radius of the project site. Eleven of these are active. The active cleanup sites include:</p> <ul style="list-style-type: none"> • Pueblo Nuevo Charter Academy (T0603700445) • Value Charter School (19730196) • Central Region Elementary School #20 Site 11 (60000872) • Belmont New Elementary No. 6 (19590008) • Central Los Angeles Learning Ctr. No. 1 (19700001) • Central Los Angeles Middle School NO. 3 (19650018) • Commonwealth Elementary School Addition (19820033) • Hoover Elementary School Expansion (19700002) • Belmont/Hollywood Primary Center No. 3 (19590002) • Belmont/Hollywood Elementary Sch. No. 1 (19820042) • Culligan Deionized Water Services (CAD000819755) <p>The Culligan Deionized Water Services site was issued a protective filer permit as of 2017 and approved for operation by the EPA. The remaining sites are school clean-up sites for possible soil or groundwater contamination from asbestos, lead, or other heavy metals. None of these sites are within 100 feet of the project site, there is no indication of release at these sites, and therefore they do not pose a significant threat to the project site (See Appendix</p>

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		<p>D).</p> <p>The Los Angeles County Department of Parks and Recreation (LACDPR) building which is currently located on the project site was issued a Notice of Violation for possible asbestos contamination in 2008, and was required to conduct an asbestos survey and conduct asbestos cleanup if such material was found. However, upon re-inspection in 2008, the building was found to be in compliance. A Limited Asbestos & Lead-Based Paint Assessment Report conducted by EFI Global in October 2016 further confirmed that the building was in compliance and no asbestos- or lead-related hazards were present (See Appendix E).</p> <p>The building generated approximately 16.86 tons of asbestos-containing waste disposed via landfill in 1995, approximately 5.5 tons of PCBs and associated materials disposed via recycler in 2006, and approximately eight tons of asbestos-containing waste disposed via landfill or surface impoundment in 2008 due to building renovation activities. Based on the nature of the proper disposal activities from renovation, and lack of evidence of waste mismanagement, the LACDPR building would not represent a significant environmental concern for the proposed project. EFI Global determined there is no other evidence of environmental contamination at the project site and concluded that additional environmental investigation is not necessary (see Appendix F). The project would be in compliance with contamination and toxic substances requirements.</p>
<p>Endangered Species</p> <p>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project site is developed with an institutional building and associated surface parking. The site does not contain vegetation and there are no street trees along the project frontage. The project site is not in proximity to identified habitat areas for endangered or sensitive species. (dd) The critical</p>

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		<p>habitat nearest to the project site is Coastal California gnatcatcher critical habitat located approximately 11 miles southeast. (dd) In addition, according to a Tree Report completed by The Tree Resource for the proposed project (June 2016), the site currently contains no trees that are protected by the Los Angeles County Oak Tree Ordinance (See Appendix G). (u) The project would have no effect on listed species because there are no federally listed species or critical habitats on the project site. The project would be in compliance with the Endangered Species Act.</p>
<p>Explosive and Flammable Hazards</p> <p>24 CFR Part 51 Subpart C</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>A search of hazardous materials databases did not reveal the presence of aboveground storage tanks or other explosive or flammable hazards within one mile of the project site. (b and g) Rincon Consultants environmental planner Jennifer Pezda performed a visual inspection on April 20, 2018 of properties adjoining the project site and the surrounding area, from adjacent sidewalks and other access points. No explosive or flammable hazards were observed. Project operation would not involve the storage or use of flammable or explosive materials. The project would be in compliance with explosive and flammable hazard requirements.</p>
<p>Farmlands Protection</p> <p>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project site is currently developed with a governmental building and associated parking and is entirely paved. No farmland, agricultural uses, or related operations are present on the project site or in the surrounding area. According to the California Department of Conservation’s Farmlands Mapping and Monitoring Program (FMMP), the project site does not contain prime or unique farmland of local or statewide importance. (c) In addition, the project site is not on land currently enrolled under the Williamson Act. (d) Therefore, the project would be in compliance with the Farmland Protection Policy Act.</p>
<p>Floodplain Management</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project site is not in a floodplain. According to Flood Insurance Rate Map Number 06037C1610F</p>

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Executive Order 11988, particularly section 2(a); 24 CFR Part 55		dated September 26, 2008 the project site is located in Flood Zone X (unshaded), which is an area defined as being outside of both the 100-year and 500-year floodplains. (v)
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	<p>The project would have no adverse effects on historic properties as no historic properties would be affected by the undertaking per Section 106, and as stipulated by 36 CFR Part 800. The findings are derived from the Section 106 Memorandum prepared for the project. (Appendix H)</p> <p><i>Regulatory Context</i> <u>National Historic Preservation Act and National Register of Historic Places</u> Section 106 of the National Historic Preservation Act (NHPA) requires federal agencies to take into account the effects of their undertakings on historic properties. The Section 106 process seeks to accommodate historic preservation concerns with the needs of federal undertakings through consultation among the agency officials and other interested parties, beginning at the early stages of planning of the undertaking. The goals of consultation are to identify historic properties potentially affected by the proposed project, to assess its effects, and to seek ways to avoid, minimize, or mitigate adverse effects on historic properties. The term “cultural resources” includes historic properties (buildings, structures, districts, landscapes, archaeological sites, Traditional Cultural Properties [TCPs], districts, and objects that are eligible for listing or that are listed on the National Register of Historic Places [NRHP]); cultural items, as defined in the Native American Graves Protection and Repatriation Act of 1990; Native American, Native Alaskan, or Native Hawaiian sites for which access is protected under the American Indian Religious Freedom Act of 1978; archaeological resources, as defined by the Archaeological Resources Protection Act of 1979</p>

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		<p>and the Antiquities Act of 1906, that are not eligible for listing or are unevaluated for listing on the NRHP; and archaeological artifact collections and associated records, as defined by 36 CFR Part 79.</p> <p>To be eligible for listing on the NRHP, a cultural resource must meet specific criteria identified in 36 CFR Part 60 and explained in guidelines published by the Keeper of the National Register.¹ The significance of effects on cultural resources is also determined by using the criteria set forth in the regulations implementing Section 106 of the NHPA. The NRHP criteria (36 CFR, 60.4) are as follows:</p> <ul style="list-style-type: none"> A. Association with events that have made a significant contribution to the broad patterns of our history; B. Association with the lives of persons significant to our past; C. Resources that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or D. Resources that have yielded or may be likely to yield information important in prehistory or history. <p>In addition to historic significance, a property must have integrity to be eligible for the NRHP. This is the property's ability to convey its demonstrated historical significance through location, design, setting, materials, workmanship, feeling, and association.</p>

¹The most widely accepted guidelines are contained in the US Department of Interior, National Park Service, "Guidelines for Applying the National Register Criteria for Evaluation," *National Register Bulletin 15* (Washington DC: US Government Printing, 1991, revised 1995 through 2002).

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		<p data-bbox="740 428 1382 459"><i>Approach to Identification of Historic Properties</i></p> <p data-bbox="740 499 1078 531">Previous Documentation</p> <p data-bbox="740 571 1386 642">The findings of this memo are based in part on the results of the following previous documentation:</p> <ol data-bbox="792 682 1422 1881" style="list-style-type: none"> <li data-bbox="792 682 1422 1262">1. Vermont Corridor Development Plan Draft Environmental Impact Report (DEIR), Cultural Resource and Tribal Cultural Resources chapters completed in November 2017. (k) The project site was documented as a part of the Vermont Corridor Development Plan by the Community Development Commission of the County of Los Angeles in compliance with the California Environmental Quality Act (CEQA). The DEIR was certified on February 14, 2018 by the County of Los Angeles Board of Supervisors. The County performed tribal consultation under Assembly Bill 52 initiated on June 8, 2017 and summarized in the DEIR Tribal Cultural Resources chapter. <li data-bbox="792 1304 1422 1881">2. Vermont Corridor Development Plan Historical Resource Report completed by GPA Consulting in May 2017 (GPA 2017, see Attachment B of Appendix H). Architectural historians Audrey von Ahrens and Allison M. Lyons of GPA Consulting prepared the report on behalf of the County of Los Angeles in support of the DEIR. Ms. Ahrens and Lyons meet the Secretary of Interiors PQS for history and architectural history. The report included a field inspection and NRHP/CRHR and local criteria evaluation of the three project sites and vicinity in the Vermont Corridor Development Plan area (Vermont Corridor Project), including the project site at 433 S.

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		<p>Vermont Avenue.</p> <p>3. Non-confidential cultural resources summary records search of the California Historical Resources Information System (CHRIS) on March 6, 2017, from the South Central Coastal Information Center (SCCIC) located at California State University, Fullerton (see Attachment C of Appendix H). The records search included a review of all recorded archaeological and built-environment resources as well as the cultural resource reports on file. In addition, the California Points of Historical Interest (SPHI), the California Historical Landmarks (SHL), the California Register of Historical Resources (CAL REG), the National Register of Historic Places (NRHP), the California State Historic Properties Directory (HPD), and the City of Los Angeles Historic-Cultural Monuments (LAHCM) listings within a ¼-mile radius were reviewed. The results of the 2017 summary non-confidential site records search identified 45 previous studies conducted within ½-mile of the Vermont Corridor Project. None of these studies appear to include the project site. The record search identified 40 previously recorded built environment resources and one (1) previously recorded archaeological site within the ½-mile radius of the project site. One (1) of these cultural resources is listed on the NRHP, 13 are listed on the CRHR, and 11 are listed on the LAHCM. No known cultural resources have been documented in the project site.</p> <p>These documents were prepared in compliance with CEQA and therefore did not include a detailed description of the area of potential effects (APE), a</p>

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		<p>confidential record search to include bibliography of the site and reports in the project radius or outreach with historic groups.</p> <p>Current Documentation</p> <p><u>Area of Potential Effects</u></p> <p>36 CFR 800.16(d) of Section 106 defines the APE of an undertaking as the “geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if any such properties exist.” The project APE is depicted on the United States Geological Survey (USGS) <i>Hollywood, CA 7.5-minute topographic quadrangle</i>. The current undertaking’s APE for archaeological and built-environment resources (or direct APE) measures approximately 0.50 acres and comprises APN 5502-009-900 (see Attachment A of Appendix H).</p> <p>As part of the Section 106 undertaking, additional study tasks were completed by Rincon on behalf of CalHFA. These included delineation of the project APE, a site visit, Section 106 consultation and a confidential CHRIS records search, as described below.</p> <p>The APE for the current undertaking was limited to the direct project footprint, because the project has no potential to directly or indirectly impact any historic properties within the vicinity of the APE. The area surrounding the project APE is developed with commercial properties. The proposed undertaking includes the construction of a new six-story apartment building, which is consistent with the existing development within the vicinity of the project.</p> <p><u>Site Visit</u></p>

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		<p>An examination of aerial imagery of the project site indicates that most of the natural ground surface within the project area is obscured by structures and paving. Given that archaeological surface discoveries were highly unlikely, an archaeological field survey was not undertaken as part of the cultural study. A Rincon specialist conducted a site visit on April 19, 2018 to record current conditions and take photographs of buildings over 50 years old.</p> <p><u>Records Search</u></p> <p>In order to obtain confidential reports and site records from the SCCIC, Rincon conducted an additional records search of the APE and ½-mile radius on April 25, 2018. This records search identified 33 previous studies, one of which (LA-08251) encompassed the project APE. This study consisted of the <i>Archaeological Resources Impact Mitigation Program, Final Report of Finding</i> for the Los Angeles Metro Red Line Project, Segment 2 and 3, prepared in September 2004 for the Metropolitan Transportation Authority. None of the archaeological resources identified and evaluated as part of study were located within the project APE. As discussed in more detail below, the record search identified an additional 29 previously recorded built resources and one (1) archeological resource within the 0.5-mile radius of the APE. The confidential record search results including the archaeological site record, site map, and bibliography lists are included in Attachment C of Appendix H.</p> <p><u>Native American Outreach</u></p> <p>As part of the Section 106 identification process, Rincon also contacted the Native American Heritage Commission (NAHC) to request a review of the Sacred Lands Files (SLF). Rincon submitted the</p>

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		<p>request to the NAHC on April 9, 2018, and received a response via email on April 18, 2018 (Attachment D of Appendix H) stating that the search of the SLF came back with negative results. The NAHC additionally provided a contact list of 9 Native American individuals and tribal organizations that may have knowledge of cultural resources in or near the APE. Rincon contacted each of the NAHC individuals and tribal organizations via email or U.S. mail on April 18, 2018 requesting information regarding their knowledge of the presence of cultural resources that may be impacted by this project. To date, Rincon has received no responses expressing concern for cultural resources within or near the APE.</p> <p><u><i>Historic Group Consultation</i></u></p> <p>Rincon prepared and mailed letters to the Los Angeles Conservancy and the Los Angeles City Historical Society on April 14, 2018 (Attachment E of Appendix H). On April 19, 2018 follow-up calls were made to both groups. To date, no response has been received from either group.</p> <p><u><i>California State Historic Preservation Office Consultation</i></u></p> <p>Rincon prepared a letter to Julianne Polanco, the California State Historic Preservation Officer (SHPO) on behalf of CalHFA initiating Section 106 consultation and concurrence with a finding of no historic properties affected for the undertaking as defined in 36 CFR Part 800.16(i). The SHPO consultation initiation letter was sent by CalHFA on May 2, 2018 The SHPO responded On May 24, 2018 and concurred with the finding of no historic properties affected by the undertaking. Should any historic properties be discovered during implementation of the undertaking, CalHFA is</p>

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		<p>required to consult further pursuant to 36 CFR §800.13(b). See Attachment F of Appendix H for the SHPO Consultation Documentation.</p> <p><i>Findings</i></p> <p>Built Environment Findings</p> <p>One four-story building constructed in 1963 is located within the APE at 433 S. Vermont Avenue. The confidential CHRIS records search conducted on April 25, 2018 identified 29 previously recorded built environment resources within the ½-mile radius of the APE; none of these recorded resources are located within the APE or its immediate vicinity. The <i>Historical Resource Report</i> by GPA Consulting included a formal evaluation of the property for listing in the National Register of Historic Places, the California Register of Historical Resources and Local registers. Rincon completed a California Department of Parks and Recreation (DPR) 523 forms using the evaluation presented in the GPA study for the property at 433 S. Vermont Avenue (for a detailed description and evaluation of the property see Attachment G of Appendix H for the DPR forms).</p> <p>The property at 433 S. Vermont Avenue was found to be ineligible for listing in the National Register of Historic Places, the California Register of Historical Resources or Local registers. The property is not associated with significant events or trends in history (Criterion A/1), is not known to be associated with the lives of persons significant in history (Criterion B/2), and the Mid-Century Modern style building is not unique example of the style nor is it associated with a master architect (Criterion C/3). Lastly, there is no indication that the property may yield important information about prehistory or history (Criterion D/4).</p>

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		<p>Archaeological Findings</p> <p>The site visit to the project APE confirmed that most of the natural ground surface is obscured by structures and paving. No evidence of archaeological surface discoveries was identified during the visit.</p> <p>The confidential CHRIS records search conducted on April 25, 2018 identified one (1) archeological resource within the ½-mile radius of the APE. This resource (P-19-3301) consists of an historic refuse scatter situated approximately 1,000 feet south of the project site. No other archaeological sites have been identified in or immediately adjacent to the project APE.</p> <p>Conclusions</p> <p>The findings were based on the results of the previously prepared historic report by GPA Consulting (Attachment B of Appendix H) and the Cultural Resources and Tribal Cultural Resources chapters for the Vermont Corridor Development Plan DEIR. (k) Rincon’s scope included the review and summary of the 2017 cultural resources studies, development of the APE, Native American scoping, and historic group and SHPO consultation. Although consultation is on-going, to date none of the historic groups or Native American tribes responded to the consultation letters sent by Rincon. The SHPO responded concurring with the finding of no historic properties affected by the undertaking</p> <p>The building at 433 S. Vermont Avenue was found to be ineligible for listing in the National, California and Local registers and is not considered a historic property for the purposes of Section 106 of the NHPA. Record search data indicate that there are no other built environment resources or archaeological resources in or within the vicinity of the APE. Based on these findings, Rincon recommends a finding of</p>

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		<p>no historic properties affected for the current undertaking. Therefore, the undertaking would have no adverse effects to historic properties. The project would be in compliance with Section 106. However, should any historic properties be discovered during implementation of the undertaking, CalHFA is required to consult further pursuant to 36 CFR §800.13(b).</p>
<p>Noise Abatement and Control</p> <p>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The proposed action is considered a noise-sensitive use because it involves the construction of housing. The project site is in an urban location. The primary noise sources in the vicinity of the project site is traffic noise from S. Vermont Avenue, adjacent to the eastern boundary of the project site; West 4th Street, approximately 250 feet north of the project site; and West 5th Street, approximately 270 feet south of the project site.</p> <p>Noise level (or volume) is generally measured in decibels (dB) using the A-weighted sound pressure level (dBA). One of the most frequently used noise metrics that considers both duration and sound power level is the equivalent noise level (Leq). The Leq is defined as the single steady A-weighted level that is equivalent to the same amount of energy at that contained in the actual fluctuating levels over a period of time (essentially, the average noise level). Community noise is measured using Community Noise Equivalent Level (CNEL), which is the 24-hour average noise level with a five-dBA penalty for noise occurring from 7:00 p.m. to 10:00 p.m. and a 10-dBA penalty for noise occurring from 10:00 p.m. to 7:00 a.m.</p> <p>This noise analysis applied the exterior noise standards contained in the Chapter 12.08 (Noise Control) of the Los Angeles County Code, which state that the acceptable 15-minute Leq daytime</p>

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		<p>exterior noise level for residential properties is 55 dBA or less, and interior noise levels must remain below 45 CNEL in habitable space, as noise levels above 45 CNEL can disrupt sleep. In cases where the existing exterior ambient 15-minute Leq noise level exceeds the identified threshold, the existing ambient noise level becomes the exterior threshold. These thresholds are similar to but more stringent than HUD's Site Acceptability Standards, which state that all sites whose environmental or community noise exposure exceeds the day-night average sound level (Ldn) of 65 dB are considered noise-impacted areas. In addition, the acceptable interior noise level for residential uses is 45 dBA or less. Noise levels described by Ldn and CNEL typically do not differ by more than one dBA. In practice, CNEL and Ldn are often used interchangeably and CNEL is often slightly higher. Because the County noise standards are in CNEL, CNEL was used for this analysis.</p> <p>Pomeroy Environmental Services (PES) conducted sound level measurements to quantify the existing noise environment for the proposed project on May 10, 2017 (See Appendix I). (m) PES took two 15-minute Leq noise measurements in the area surrounding the project site in order to characterize the general ambient noise level. The ambient sound level measured at the northwest corner of the project site was 55.4 dBA Leq, and ambient sound level measured east of the project site across S. Vermont Avenue was 68.7 dBA Leq. Both of these levels exceed the allowable exterior daytime noise level threshold of 55 dBA Leq for residential areas as specified in the County of Los Angeles' Exterior Noise Standards. However, the County Standards state that if the measured ambient noise level exceeds the existing exterior noise standard, the measured ambient noise level can be used as the new exterior noise standard. Therefore, the new ambient noise standard used in this analysis is 55.4 dBA Leq as</p>

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		<p>measured at the project site. This is a conservative estimate of the allowable exterior noise threshold as the 55.4 dBA Leq noise measurement was taken at the back of the project site, further from traffic noise associated with S. Vermont Avenue.</p> <p><i>Exterior.</i> The current noise level at the project site is expected to fall between 55.4 dBA Leq and 68.7 dBA Leq, based on the two noise measurements taken by PES at the rear of the project site and directly opposite the project site, across S. Vermont Avenue. (m) Although Leq measurements do not readily translate into CNEL noise levels, it can be assumed that, barring any loud, regularly-occurring evening and nighttime noise sources, CNEL noise levels would generally be within 5 – 10 dBA of measured daytime Leq levels. Future increases in ambient noise levels at the project site would result from automobile and truck traffic traveling on S. Vermont Avenue. Implementation of the proposed action is anticipated to increase local traffic noise levels by a maximum of 0.3 dBA CNEL on the roadway segment of S. Vermont Avenue between 4th and 5th Streets. Based on modeling completed as part of the PES’s noise calculations, future roadway noise levels fronting S. Vermont Avenue between 4th and 5th Streets could reach up to 69.8 dBA CNEL with implementation of the proposed action and 70.7 dBA CNEL with implementation of the proposed action and expected cumulative projects. (m) These estimates of future CNEL noise levels based on traffic noise are within the expected noise level range based on daytime Leq measurements, as described above. Although the project site is not subject to City of Los Angeles regulations, according to the City of Los Angeles’ CEQA Thresholds Guide, a project would have a significant impact on noise levels from project operations if it causes the ambient noise level measured at the property line to increase by three dBA in CNEL to or within the “normally</p>

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		<p>unacceptable” or “clearly unacceptable” noise level ranges specified in the Noise Element of the General Plan. As the anticipated increase of 0.3 dBA CNEL is below the three-dBA CNEL increase threshold, outdoor noise levels during project operation would be consistent with the City and County noise standards and project operation would not significantly increase existing community ambient noise levels.</p> <p><i>Interior.</i> As described above, future exterior noise levels at the project site would be approximately 70.7 dBA CNEL. (m) Current construction techniques are expected to achieve at least 15 dB of exterior-to-interior noise attenuation when windows are open. With a 15 dB reduction, interior noise levels would be reduced to 55.7 dBA CNEL, which exceeds the 45 dBA CNEL noise threshold for habitable spaces. (m) However, exterior wall assembly, windows, and glass doors are available with Sound Transmission Class (STC) rating of 25 or more. Mechanical ventilation can be implemented to eliminate the need for open windows. As required by Chapter 12.08 of the Los Angeles County Code, the project would be designed and constructed to ensure that interior noise levels attributable to exterior sources would not exceed 45 dBA CNEL in any habitable room. Therefore, the project would be in compliance with the Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978.</p>
<p>Sole Source Aquifers</p> <p>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project site is not in proximity to a sole source aquifer (SSA) areas. The closest SSA area is the Camp/Cottonwood Creek Aquifer in San Diego County, which is located approximately 136 miles south of the City of Los Angeles. (bb) The project would be in compliance with Safe Drinking Water Act requirements pertaining to SSAs.</p>
<p>Wetlands Protection</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>There are no natural wetlands on the project site as determined by field review by Rincon Consultants</p>

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
Executive Order 11990, particularly sections 2 and 5		environmental planner Jennifer Pezda, on April 20, 2018, and review of the National Wetlands Inventory Mapper. (ee) The closest identified wetland area is the freshwater pond in MacArthur Park, approximately one mile east of the project site. At this distance, neither construction nor operation of the proposed project would affect the existing conditions of the pond. The project would be in compliance with wetland protection requirements.
Wild and Scenic Rivers Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The nearest Wild and Scenic River is Sespe Creek, which is located approximately 45 miles northwest of the project site. (w and x) Implementation of the proposed action would have no effect on Sespe Creek and the project would be in compliance with the Wild and Scenic Rivers Act.
ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	<p>In 2010, The County of Los Angeles had a total population of 9,818,605. Of this population, 71 percent was white, 48.5 percent was Hispanic or Latino, three percent was two or more races, 15.1 percent was Asian, 9.1 percent was Black or African American, 1.5 percent was American Indian, and 0.4 percent was Native Hawaiian and Other Pacific Islander. Based on these population demographics, the County of Los Angeles has a considerably greater Hispanic/Latino and Asian population constituency than the general U.S. population, which represents a greater percentage of environmental justice populations than exists nationwide, per the U.S. Census “State & County QuickFacts,” accessed online at https://www.census.gov/quickfacts in April 2018.</p> <p>The project site is in in Zip Code Tabulation Area (ZCTA) 90020 within Los Angeles County. In the 90020 ZCTA, 9.5 percent of the population lives below the poverty line. The proposed project would provide 72 new housing units affordable to low-income seniors, including minority and other</p>

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		<p>populations.</p> <p>The project site is in an area characterized by a mix of commercial and residential uses. As discussed under <i>Contamination and Toxic Substances</i>, no significant environmental concerns requiring remediation are on-site. Therefore, the project would not expose low-income or minority populations to environmental justice adverse effects, and would not have a disproportionate adverse impact on minority or low-income populations (see Appendix D). The project would be in compliance with Executive Order 12898.</p>

Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27]:

Recorded below is the qualitative and quantitative significance of the effects of the project on the character, features, and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable, and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Citations to support the impact evaluations are listed below the following table and are cited in the ‘Impact Evaluation’ column in parentheses “().” Additional documentation is attached, as appropriate. All conditions, attenuation, or mitigation measures have been clearly identified.

Impact Codes: The following impact codes are used to make determinations for each factor:

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor Adverse Impact – May require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement

Environmental Assessment Factor	Impact Code	Impact Evaluation
LAND DEVELOPMENT		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	The 433 Vermont Apartments Project (part of the Vermont Corridor Project) is consistent with the development density, intensity, and land use goals established by the County of Los Angeles General Plan, as analyzed in the Vermont Corridor Project Draft EIR (SCH No. 2017051013) by the County of Los Angeles Community Development Commission in November 2017. (1) As discussed in the Land Use section of the Draft EIR, the project site is owned by the County of Los Angeles, and therefore is not subject to the City of Los Angeles General Plan or zoning. However, as the site is located within the City of Los Angeles, it is not specifically addressed in the County General Plan. Nevertheless, the Draft EIR evaluated the proposed project’s consistency with both the City of Los Angeles General Plan and the County of Los Angeles General Plan, as well as with the City of Los Angeles General Plan Framework Element, the Southern California Association of Governments’ (SCAG) 2016 RTP/SCS, the Wilshire Community Plan, the Healthy LA Plan, and the Wilshire Center/Koreatown Redevelopment Plan. The proposed project is consistent with all plans mentioned above. (1)

Environmental Assessment Factor	Impact Code	Impact Evaluation
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	<p>According to the National Resources Conservation Service Web Soil Survey, soil on the project site is primarily urban land comprised of loam and clay loam (ranging from zero to five and five to 20 percent slopes), which has a soil erodibility rating of medium. (aa) The project would not result in substantial soil erosion or the loss of topsoil because the project would comply with all applicable Los Angeles County grading permit regulations as well as the County Low Impact Development (LID) Ordinance. Compliance with the County grading permit regulations requires implementation of measures, plans, and inspections to reduce sedimentation and erosion from the project site during construction. Further, because development of the proposed project would reduce the amount of impervious surface area in the project site from 100 percent to 95 percent, compliance with the County LID ordinance would require implementation of stormwater mitigation plans that ensure the project would mitigate any potential runoff from the project site in a manner that captures rainwater at its source while utilizing natural resources. For this, the proposed project would collect stormwater runoff from the building roof and hardscape areas via roof drains, area drains, and pipes and direct flows to discharge points and existing catch basins located on the adjacent public streets (see Appendix J). Lastly, the project site is generally flat, which further reduces the potential for substantial erosion during a storm event.</p>
Hazards and Nuisances including Site Safety and Noise	2	<p>The project site is located within the Hollywood Quadrangle in the City of Los Angeles. According to the Seismic Hazards Map for the Hollywood Quadrangle developed by the California Geological Survey (CGS), the project site is not located within or adjacent to an identified liquefaction risk area or landslide zone. (f) Nevertheless, the proposed project would be required to comply with Regulatory Requirements RR GS-1 through RR GS-3 of the County Building Code which require preparation of a design-level geotechnical investigation of the project site. A geotechnical study would be completed for the proposed project prior to building permit issuance, and therefore the project would be in compliance with the California Building Code and implementation of standard engineering techniques would ensure structural safety.</p> <p>According to the CalFire Fire Hazard Severity Zones Map</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
		<p>for Los Angeles County, the project site is not within or adjacent to a fire hazard area. (a) The project site is not adjacent to County designated wildlands or other land type that has the potential to support wildland fires. Therefore, the proposed project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.</p> <p>Permanent noise sources associated with the project such as mechanical equipment and heating, ventilation, and air conditioning units (HVAC) are subject to the County Noise Ordinance one-hour average sound level limit at the property line. (m) All equipment would be required to comply with Section 12.08.530 of the County Code, which prohibits noise from such equipment from exceeding the existing ambient noise level on the premises by more than five dBA. In result, all on-site equipment would be designed such that it would be shielded, and appropriate noise-muffling devices would be installed on the equipment to reduce noise. In addition, nighttime noise limits would apply to any equipment required to operate between 10:00 p.m. and 7:00 a.m. Therefore, HVAC noise would not exceed County noise regulations. (m)</p>
Energy Consumption	1	<p>In order for the applicant to obtain County building permits, the project would be required to meet energy consumption standards as outlined in the California Building Code, Title 24, and the applicable Building Energy Efficiency Standards. (e) As provided in <i>Description of the Proposed Project</i>, key energy saving elements included in the project include maximizing available efficiencies through using recycling materials during building construction, utilizing drought tolerant landscaping, installing a high efficiency irrigation system, installing an easily-accessible recycling area for tenants, providing electric car charging stations, and installing rainfall retention features to reduce off-site runoff. In addition, the project site is within 100 feet of existing commercial facilities and within 200 feet of existing transit facilities and would thus reduce the need for personal vehicle use.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
SOCIOECONOMIC		

Environmental Assessment Factor	Impact Code	Impact Evaluation
Employment and Income Patterns	2	<p>The project would create temporary construction jobs and approximately 46 permanent jobs associated with the senior affordable housing and the community recreation center, which would not substantially alter long-term employment or income patterns. In the City of Los Angeles, the Southern California Association of Governments (SCAG) estimated the City population to be 3,845,500 and employment levels to be 1,696,400 in 2012. SCAG anticipates a population growth of 4.4 percent and an employment growth of approximately 12 percent between 2012 and 2020. (y) The existing LACDPR building on the project site houses 112 employees. Development of the proposed project would require the current employees to be relocated to offsite facilities. Therefore, although implementation of the proposed action would result in fewer employees on project site, it would generate an overall increase in employment within the City of Los Angeles. Because the former 112 employees likely would be relocated to another site, and 46 new employees would be generated, overall employment in the city would increase by approximately 46 persons. (n), This increase would be consistent with SCAG's employment growth projections. Furthermore, additional employment associated with implementation of the proposed action in this area of the City would be consistent with regional growth management policies which promote development activity in existing developed areas, especially those near existing transit and transportation infrastructure. These policies also encourage development of higher density residential uses near major public transportation centers to reduce vehicle trips, congestion, and encourage pedestrian-oriented development. Therefore, the proposed project would be consistent with regional employment projections as well as with development density and land use goals of local and regional regulatory plans.</p>
Demographic Character Changes, Displacement	2	<p>The project site does not currently contain residences; therefore, the proposed project would not cause displacement of any existing residences.</p> <p>As discussed in the prior section, SCAG projects the City population to increase by approximately 171,500 individuals between 2012 and 2020. According to the Draft EIR for the Vermont Corridor Project, based on an estimated 2.51 persons per dwelling unit in the Wilshire Community Plan</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
		Area, development of 72 new residential units under the proposed project would accommodate approximately 181 new residents by 2020. (n) The addition of 181 new residents would constitute 0.03 percent of SCAG's anticipated population increase, and would therefore be within SCAG's population growth projections. Furthermore, the type of higher density residential development that would be facilitated by the proposed project was anticipated by the City of Los Angeles General Plan Framework EIR and the County of Los Angeles General Plan EIR, and similar land uses border the project site. (h and t) Therefore, no demographic character changes are anticipated to occur.

Environmental Assessment Factor	Impact Code	Impact Evaluation
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	2	The project site is 0.5 mile southwest of Commonwealth Avenue Elementary School, 0.7 mile southwest of Central City Value High School, and 0.8 mile east of Charles H. Kim Elementary School. Additionally, the project site is located 0.5 mile northwest of the Southwestern University Library and the Felipe De Neve Branch of the Los Angeles County Public Library. As determined in the Draft EIR for the Vermont Corridor Project, because the proposed project involves development of senior affordable housing units, no student generation would be associated with this use and the project would not result in the need for significantly altered services or facilities or require the construction of new educational facilities. (o)
Commercial Facilities	1	The project site is currently developed with a LACDPR office and associated surface lot parking located within one block of commercial facilities. The proposed project would involve relocation of LACDPR employees, demolition of the existing building, and would develop the site with affordable senior housing, placing residences within walking distance of these commercial facilities. The proposed project would generate approximately 181 new residents that would be served by nearby commercial facilities, thus resulting in a beneficial impact.
Health Care and Social Services	2	The project site is located 0.9 mile northeast of the Los Angeles Children's Hospital, approximately one mile west of the St. Vincent Medical Center, and 1.3 miles north of the St. Anthony Medical Center. In addition, the project site is

Environmental Assessment Factor	Impact Code	Impact Evaluation
		located 1.5 miles northwest of the Rampart Station of the Los Angeles Police Department and 1.3 miles northwest of Los Angeles Fire Department Stations 11 and 13. Five churches are located in the vicinity of the project site, within a 0.25-mile radius. As determined in Draft EIR for the Vermont Corridor project prepared in November 2017, and given the approximate distance to existing facilities, the proposed project would not result in the need for significantly altered health care or social services or require the construction of new facilities. (o)
Solid Waste Disposal / Recycling	2	The City of Los Angeles is most commonly serviced by the City Department of Public Works Bureau of Sanitation (LABS) for residential waste collection and by the Sunshine Canyon Landfill for waste disposal. As identified in the Draft EIR prepared for the Vermont Corridor Project, which includes the proposed project, waste generated by the proposed project would be able to be serviced by the Sunshine Canyon Landfill's remaining capacity. Further, the proposed project would be subject to the requirements of AB 939 that require at least 50 percent of waste generated to be diverted from landfills. Therefore, the project would be able to be served by existing solid waste disposal services and facilities. (p)
Waste Water / Sanitary Sewers	2	As provided in the DEIR for the Vermont Corridor Project, operation of the proposed project would generate approximately 17,835 gallons of wastewater per day (gpd). A Sewer Capacity Availability Request (SCAR) was submitted to determine whether existing wastewater infrastructure would be able to accommodate additional demand generated by the proposed project. LABS approved the SCAR for a net increase in wastewater generation of 124,464 gpd to the sewer collection system. The wastewater demand generated by the proposed project is within the amount approved for the SCAR, ensuring that the project site would be able to be serviced by existing sewer capacity. (p)
Water Supply	2	Analysis for both fire suppression and domestic water flows was conducted by LADWP for the proposed project (see Appendix L). Fire suppression facilities would meet LAFD and LADWP requirements, and the existing public water distribution infrastructure was determined to have sufficient capacity to serve the project site. (p)
Public Safety - Police, Fire and	2	The project site is located 0.9 mile northeast of the Los Angeles Children's Hospital, approximately one mile west

Environmental Assessment Factor	Impact Code	Impact Evaluation
Emergency Medical		<p>of the St. Vincent Medical Center, and 1.3 miles north of the St. Anthony Medical Center. In addition, the project site is located approximately 1.5 miles northwest of the Rampart Station of the Los Angeles Police Department and 1.3 miles northwest of Los Angeles Fire Department Stations 11 and 13. As discussed in the Draft EIR for the Vermont Corridor Project, development of the proposed project would not affect emergency site access or response times given the proximity of these stations. Further, on-site fire hydrants would be required to meet the minimum fire flow requirements provided in the Fire Code. (o) Based on the distances to local public safety service facilities there are adequate facilities to serve the proposed project. (o)</p>
Parks, Open Space and Recreation	2	<p>The City of Los Angeles Department of Parks and Recreation (LADPR) is responsible for overseeing approximately 16,000 acres of park and open space land. The City's goal for neighborhood and community park acreage is four acres per 1,000 residents. (q) The project site is located in an area that is below this standard with 0.23 acre of parkland per 1,000 people, and active recreational features are heavily used. However, residents in the surrounding area have access to nearby large regional park facilities, including Griffith Park and Elysian Park.</p> <p>The addition of 72 new residential units for seniors would result in a nominal increase in demand for parks. Furthermore, the proposed project would include open space areas such as court yards and a 13,200-square foot community recreation center. These features would reduce demand for public parks, and would provide additional community recreation resources. Overall, the inclusion of open space and the community recreation center would offset any increased demand associated with the residential units developed under the proposed project. (q)</p> <p>Furthermore, the project site is 0.2 mile west of the Shatto Recreation Center and approximately one mile northwest of MacArthur Park. In addition, the project is 0.5 mile northwest of the Southwestern University Library and the Felipe De Neve Branch of the Los Angeles County Public Library. No impacts to parks and recreational facilities would occur as a result of the project.</p>
Transportation and Accessibility	2	<p>The project site is located within one block of a Los Angeles County Metropolitan Transportation Authority (Metro)</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
		Transit System bus stop. Therefore, there would be public transportation available for future residents as part of the project.

Environmental Assessment Factor	Impact Code	Impact Evaluation
NATURAL FEATURES		
Unique Natural Features, Water Resources	2	The project site is located in an urbanized area and is entirely paved. The site is relatively flat with no substantial changes in elevation or topography. The area immediately surrounding the project site contains a number of low-, mid-, and high-rise buildings. As the project site and surrounding area is entirely developed and built-out, there are no unique natural features or water resources within or in proximity to the project site or surrounding area. Therefore, the proposed project would not alter any such resources.
Vegetation, Wildlife	2	The project site is entirely developed with a four-story building and paved surface parking. The site contains no street trees or other vegetation and is located in an urbanized area of the City. Furthermore, as discussed under <i>Endangered Species</i> , the project site is not in proximity to critical habitat areas or other wildlife habitat. Therefore, the project would not affect existing vegetation or wildlife in the City of Los Angeles.
Other Factors	3	A Traffic Assessment dated June 2017 was completed for the project and analyzed potential traffic impacts at 38 study intersections within the project area (see Appendix M). (r) Based on the traffic analysis, it was determined that the nearby project-area intersections and roadway segments were operating at acceptable levels of service and would continue to operate at acceptable levels of service following project construction. However, new vehicle trips generated during operation of the proposed project would significantly impact the existing volume-to-capacity (V/C) ratio of the Vermont Avenue/Wilshire Boulevard intersection during the afternoon peak hour. (r) However, mitigation measures were identified in consultation with the Los Angeles Department of Transportation (LADOT) to reduce these impacts. The measures included implementation of a transportation demand management (TDM) program to promote peak period trip reduction, and implementation of transportation system management (TSM) improvements, including installation of a traffic monitoring camera and fiber optic data transmission line to allow video monitoring of the

Environmental Assessment Factor	Impact Code	Impact Evaluation
		traffic signal system. The Traffic Assessment concluded that implementation of these measures would fully mitigate impacts to existing traffic conditions generated from operation of the proposed project. Required mitigation measures are listed below under the heading Mitigation Measures and Conclusions.

Additional Studies Performed:

- Appendix A: Figure 1 Regional Location
Figure 2 Project Location
- Appendix B: Site Plan
- Appendix C: County of Los Angeles. Appendix 4.2-1 of Draft EIR for Vermont Corridor Project. Air Quality Calculations. October 2017
- Appendix D: EFI Global, Inc. Phase I Environmental Site Assessment Report [for] 433 South Vermont Avenue, Los Angeles, California 90020. October 2017
- Appendix E: EFI Global, Inc. Update of Asbestos and Lead-Based Paint Survey Report [for] 433 S. Vermont Avenue, Los Angeles, California 90020. October 2017
- Appendix F: EFI Global, Inc. Limited Asbestos & Lead-Based Paint Assessment Report. October 2016
- Appendix G: The Tree Resource. Tree Letter Site 3. June 2016
- Appendix H: Rincon Consultants, Inc. Cultural Resources Memo. 2018
- Appendix I: Pomeroy Environmental Services. Noise Monitoring Data. May 2017
- Appendix J: KPFF Consulting Engineers. Vermont Corridor Development Project Water Resources Conceptual Report. October 2017
- Appendix K: Geotechnologies, Inc. Geotechnical Assessment [for] Site 3: Proposed Affordable Housing Development [at] 427 and 433 South Vermont Avenue, Los Angeles, CA. November 2016
- Appendix L: Los Angeles Department of Water and Power. Water Supply Assessment – Vermont Corridor Development Project. August 2017
- Appendix M: Gibson Transportation Consulting, Inc. Transportation Impact Study for the Vermont Corridor Development Plan. June 2017

Field Inspection (Date and completed by):

Rincon Consultants, site visit by Jennifer Pezda, April 19, 2018

List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]:

- a) Calfire. 2012. Local Responsibility Area Fire hazard Severity Zones. Accessed April 2018. http://frap.fire.ca.gov/webdata/maps/los_angeles/LosAngelesCounty.pdf
- b) California Department of Toxic Substances Control. 2018. EnviroStor. Accessed April 2018. <https://www.envirostor.dtsc.ca.gov/public/>
- c) California Department of Conservation (DOC). 2016. Los Angeles County Important Farmland. Accessed April 2018. <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf>
- d) DOC. 2016. Los Angeles County Williamson Act FY 2015/2016. Accessed April 2018. ftp://ftp.consrv.ca.gov/pub/dlrp/wa/LA_15_16_WA.pdf
- e) California Energy Commission. 2018. 2016 Building Energy Efficiency Standards. Accessed April 2018. <http://www.energy.ca.gov/title24/2016standards/index.html>
- f) California Geologic Survey. 1999 Hollywood Quadrangle. Accessed April 2018. http://gmw.conservation.ca.gov/SHP/EZRIM/Maps/HOLLYWOOD_EZRIM.pdf
- g) California State Water Resources Control Board. 2015. GeoTracker. Accessed April 2018. <https://geotracker.waterboards.ca.gov/>
- h) City of Los Angeles. 1995. General Plan Framework Draft EIR. Accessed April 2018. <https://planning.lacity.org/housinginitiatives/housingelement/frameworkeir/FrameworkFEIR.pdf>
- i) County of Los Angeles. 2018. Airport Land Use Commission A-NET. <http://planning.lacounty.gov/assets/obj/anet/Main.html>. Accessed April 2018.
- j) County of Los Angeles. 2017. Draft Environmental Impact Report for Vermont Corridor Project Section 4.2 Air Quality. Accessed April 2018. <https://www.lacdc.org/economicdevelopment/special-projects/vermont-corridor>
- k) County of Los Angeles, Community Development Commission. 2017. Draft Environmental Impact Report Vermont Corridor Development Plan, Cultural Resources and Tribal Cultural Resources. November. Certified February 14, 2018. Available online <https://www.lacdc.org/economicdevelopment/special-projects/vermont-corridor>, accessed April 13, 2018.
- l) County of Los Angeles. 2017. Draft Environmental Impact Report for Vermont Corridor Project Section 4.9 Land Use. Accessed April 2018. <https://www.lacdc.org/economicdevelopment/special-projects/vermont-corridor>
- m) County of Los Angeles. 2017. Draft Environmental Impact Report for Vermont Corridor Project Section 4.10 Noise. Accessed April 2018. <https://www.lacdc.org/economicdevelopment/special-projects/vermont-corridor>
- n) County of Los Angeles. 2017. Draft Environmental Impact Report for Vermont Corridor Project Section 4.11 Population, Housing, and Employment. Accessed April 2018. <https://www.lacdc.org/economicdevelopment/special-projects/vermont-corridor>

- o) County of Los Angeles. 2017. Draft Environmental Impact Report for Vermont Corridor Project Section 4.12 Public Services. Accessed April 2018. <https://www.lacdc.org/economicdevelopment/special-projects/vermont-corridor>
- p) County of Los Angeles. 2017. Draft Environmental Impact Report for Vermont Corridor Project Section 4.16 Utilities and Service Systems. Accessed April 2018. <https://www.lacdc.org/economicdevelopment/special-projects/vermont-corridor>
- q) County of Los Angeles. 2017. Draft Environmental Impact Report for Vermont Corridor Project Section 4.13 Recreation. Accessed April 2018. <https://www.lacdc.org/economicdevelopment/special-projects/vermont-corridor>
- r) County of Los Angeles. 2017. Draft Environmental Impact Report for Vermont Corridor Project Section 4.14 Transportation and Traffic. Accessed April 2018. <https://www.lacdc.org/economicdevelopment/special-projects/vermont-corridor>
- s) County of Los Angeles. 2015. Los Angeles County General Plan Noise Element. Accessed April 2018. http://planning.lacounty.gov/assets/upl/project/gp_final-general-plan-ch11.pdf
- t) County of Los Angeles. 2015. Los Angeles County General Plan Update Draft EIR. Accessed April 2018. http://planning.lacounty.gov/assets/upl/project/gp_2035_deir.pdf
- u) County of Los Angeles. 2018. Municipal Code Section 22.56 Part 16, Oak Tree Permits. Accessed April 2018. https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances?nodeId=TIT22PLZO_DIV1PLZO_CH22.56COUSPEVANOUSTEUSDIRE_PT16OATRPE
- v) FEMA. 2008. FEMA Flood Map No. 06037C1610F. Accessed April 2018. <https://msc.fema.gov/portal/search?AddressQuery=2600%20Avenida%20Del%20Presidente%20San%20Clemente%2C%20CA%2092672#searchresultsanchor>
- w) National Park Service (NPS). 2018a. Nationwide Rivers Inventory. Accessed April 2018. <https://www.nps.gov/maps/full.html?mapId=8adbe798-0d7e-40fb-bd48-225513d64977>
- x) National Park Service (NPS). 2018b. National Scenic River System Map. Accessed April 2018. <https://nps.maps.arcgis.com/apps/MapJournal/index.html?appid=ba6debd907c7431ea765071e9502d5ac>
- y) SCAG. 2016. 2016-2040 RTP/SCS Final Growth Forecast by Jurisdiction. Accessed April 2018. https://www.scag.ca.gov/Documents/2016_2040RTPSCS_FinalGrowthForecastbyJurisdiction.pdf
- z) SCAQMD. 2016. Attainment Status for South Coast Air Basin. Accessed April 2018. <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/naaqs-caaqs-feb2016.pdf>
- aa) U.S. Department of Agriculture (USDA). 2018. Web Soil Survey. Accessed April 2018. <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>
- bb) U.S. EPA. 2018. Sole Source Aquifer Map. Accessed April 2018. <https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=9ebb047ba3ec41ada1877155fe31356b>
- cc) U.S. Fish and Wildlife Service (USFWS). 2017. Coastal Barrier Resources System. Coastal Barrier Resources Act. (Public Law 97-348) Enacted October 18, 1982. Modified November 1, 2017. Accessed April 2018. <https://www.fws.gov/cbra/Act.html>

dd) U.S. Fish and Wildlife Service (USFWS). 2018. Critical Habitat Mapper. Accessed April 2018.
<https://fws.maps.arcgis.com/home/webmap/viewer.html?webmap=9d8de5e265ad4fe09893cf75b8dbfb77>

ee) U.S. Fish and Wildlife Service (USFWS). 2018. National Wetlands Inventory Mapper. Accessed April 2018.
<https://www.fws.gov/wetlands/data/mapper.html>

List of Permits Obtained:

Prior to construction, Grading and Improvement Plans and Building Permits are required to be obtained from the Los Angeles County Department of Public Works.

Public Outreach [24 CFR 50.23 & 58.43]:

None

Cumulative Impact Analysis [24 CFR 58.32]:

The 433 Vermont Apartments Project would not result in adverse environmental impacts and would not result in impacts that are individually limited but cumulatively considerable. The project would be consistent with the density and use characteristics of the development considered by the County of Los Angeles General Plan EIR as well as the City of Los Angeles General Plan Framework Element EIR, and would represent a small portion of the growth that was forecast in the buildout of both Plans. The General Plan Update EIR considered the incremental impacts of the proposed project and no potentially significant on or off-site cumulative impacts have been identified that were not previously evaluated. General Plan policies and mitigation measures included with the General Plan Update EIR address the cumulative impacts associated with the consideration of other projects. The project applicant would implement a TDM program as well as install TSM improvements to mitigate potential cumulative impacts caused by traffic from this development and future development.

Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]:

No Action Alternative [24 CFR 58.40(e)]: Under the No Action Alternative the site would remain developed with the existing LACDPR office and associated surface parking. There is a need in the City of Los Angeles for the development of affordable housing for seniors and special needs populations. The proposed project would provide 72 affordable units specifically for seniors and special needs populations. There would be no adverse environmental effects associated with the proposed project. The No Action Alternative would not provide housing specifically for seniors or provide affordable housing.

Office Project Alternative: Under the Office Project Alternative, the existing site would continue to be used for County offices but would also include development of a community recreation center. The existing building would be increased to five stories with approximately 67,637 square feet of office space, and the ground floor would have a 13,200-square-foot community recreation center, the same size as under the proposed project. No residential development would be included under this alternative. Reducing the number of apartment units

and increasing the amount of office space would have similar impacts as the proposed project for most environmental issue areas, and in some areas impacts would be lower. In particular, by not generating new residents on-site, the office project alternative would reduce impacts in issue areas including population and housing growth and energy use. However, this alternative would not achieve the primary purpose and need of the proposed action, which is to increase the number of affordable housing units in the City of Los Angeles.

Summary of Findings and Conclusions:

The project would involve the construction of a 72-unit senior housing apartment complex on an approximately 0.5-acre lot in an urban area in the City of Los Angeles. The complex would consist of one- and two-bedroom units for low-income seniors and special needs populations, and would include indoor and outdoor community space.

The project would not have any potentially significant environmental impacts to the extent that an Environmental Impact Statement would be required. The project would result in minor adverse but mitigable impacts for several environmental issue areas, including historic preservation and traffic and transportation. Consultation with SHPO and/or the ACHP, as necessary, during implementation of the proposed action would minimize or avoid potential impacts to historic properties. Implementation of a transportation demand management (TDM) program to promote peak period trip reduction, and implementation of transportation system management (TSM) improvements, including installation of a traffic monitoring camera and fiber optic data transmission line to allow video monitoring of the traffic signal system, would minimize or avoid potential impacts to existing traffic conditions in the project area.

The proposed action is consistent with the land use and development goals of both the Los Angeles County General Plan and the City of Los Angeles General Plan Framework Element, as both encourage and anticipate increased residential development with neighborhood serving land uses along with increased development density and intensity. No adverse environmental effects were identified for the proposed project that cannot be fully mitigated. Implementation of the proposed action would help to fulfill the need for affordable housing for seniors and special needs populations in the Wilshire Center/Koreatown area in the City. Implementation of the proposed action would not result in a significant impact on the quality of the human environment on the project site or in the project vicinity.

Mitigation Measures and Conditions [40 CFR 1505.2(c)]

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents.

Law, Authority, or Factor	Mitigation Measure
Historic Preservation	Per SHPO recommendation, should any historic properties be discovered during the implementation of

Name/Title/Organization: Matthew Long, Senior Environmental Scientist, Rincon Consultants, Inc.

Certifying Officer Signature: _____ Date: _____

Name/Title: Tia Boatman Patterson, Executive Director

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