

## VI. OTHER MANDATORY CEQA SECTIONS

### A. UNAVOIDABLE SIGNIFICANT IMPACTS

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe significant environmental impacts that cannot be avoided, including those effects that can be mitigated but not reduced to a less-than-significant level. Following is a summary of the impacts associated with the proposed project that were concluded to be significant and unavoidable. These impacts are also described in detail in Section IV Environmental Impact Analysis of this Draft EIR.

#### **Aesthetics - Shadows**

During the Winter Solstice, shadows cast from the Specific Plan area from 9:00 a.m. through 3:00 p.m. would cast shadows on adjacent residences on the north side of 97<sup>th</sup> Street. As Figures IV.A-15 and IV.A-16 illustrate, shadows generated from the Specific Plan area would affect the front yards of residences located across from the site on 97<sup>th</sup> Street for a period of more than three hours. According to the City of Los Angeles CEQA thresholds, this would be a potentially significant impact. No feasible mitigation measures exist to reduce shade and shadow impacts. Therefore, unavoidable significant impacts would remain.

#### **Air Quality – Construction**

NO<sub>x</sub> and PM<sub>10</sub> regional emissions as well as PM<sub>2.5</sub> and PM<sub>10</sub> local concentrations would exceed regional and local significance thresholds during construction. Regional emissions and localized concentrations would still exceed the significance thresholds at off-site and on-site receptors with mitigation, as shown in Tables IV.C-11 and IV.C-12, respectively. Therefore, unavoidable significant impacts would remain.

#### **Air Quality – Operation, Mobile Source Emissions**

Mitigation measures discussed in Section IV.C Air Quality would reduce regional operational emissions. However, the majority of emissions would result from mobile sources which cannot be substantially reduced through mitigation as the Applicant cannot reasonably impose mitigation on private vehicles. Therefore, unavoidable significant impacts would remain.

#### **Air Quality – Operation, Climate Change and Greenhouse Gas (GHG) Emissions**

Mitigation measures discussed in Section IV.C Air Quality, would ensure that efforts are continued to increase job opportunities and regional transit in the Specific Plan area. This would ultimately reduce regional vehicles miles traveled and associated GHG emissions. Nonetheless, GHG emissions would result in an unavoidable significant impact.

#### **Noise – Construction**

Mitigated construction noise levels are anticipated to exceed the 5-dBA significance threshold at multiple sensitive receptors during all phases of construction activity even with mitigation. Therefore, unavoidable significant impacts would remain.

### **Traffic – Intersection Level of Service**

There are four signalized study intersections that would be impacted by the proposed project according to the City of Los Angeles CMA methodology:

- #1 Alameda Street (W) and Firestone Boulevard (County of Los Angeles, PM peak hour)
- #5 Alameda Street (W) and Century Boulevard/Martin Luther King Jr. Boulevard (City of Lynwood, AM and PM peak hours)
- #20 Central Avenue and Century Boulevard (City of Los Angeles, AM and PM peak hours)
- #35 Long Beach Boulevard and Tweedy Boulevard (Cities of South Gate and Lynwood, AM and PM peak hours)

Although there have been potential physical mitigation measures identified, the right-of-way limitations at these intersections do not permit their implementation. Therefore, as there are no feasible mitigation measures to mitigate these impacts, unavoidable significant impacts would remain.

### **B. REASONS WHY THE PROJECT IS BEING PROPOSED, NOTWITHSTANDING UNAVOIDABLE SIGNIFICANT IMPACTS**

In addition to identification of the proposed project's unavoidable significant impacts, Section 15126.2(b) of the CEQA Guidelines requires that the reasons why the project is being proposed, notwithstanding these impacts, be described.

The community including and surrounding Jordan Downs has declined amidst federal disinvestment in the 1970s and 1980s, which has led to heightened crime and blight. Concentrations of poverty in the Watts area have resulted in high crime indices, high unemployment rates, low educational attainment, a disproportionate number of single-parent households, and poor health of residents. The Watts area has the highest negative health indices in all of Los Angeles County, ranging from high incidents of diseases such as diabetes, hypertension, heart disease, childhood obesity, and asthma. The resurgence of gang violence in the area may be caused by the exodus of jobs in the Watts area coupled with budget cutbacks that affect public assistance service in the area. The cutbacks have also contributed to the severely distressed condition of the housing stock. Systemic disinvestment in public housing by the federal government has resulted in a Citywide, 40-year-old inventory of severely distressed housing stock with deferred maintenance needs in excess of \$500 million.

The purpose of redeveloping Jordan Downs is to improve the quality of life for the people who live there, to serve as a catalytic redevelopment that could potentially leverage other resources to improve the greater Watts community, and most importantly, to de-concentrate poverty in and around Jordan Downs. There is much potential for revitalization of the Jordan Downs Community as it is located along the Alameda Corridor and several other transit corridors. Its connection to the regional economy makes it a viable option for established and new residents. The purpose also includes the increase in housing stock by approximately 1,100 dwelling units.

The Southern California Association of Governments (SCAG) estimates the City of Los Angeles will need about 114,000 housing units for people with very low to above moderate household income to meet the current demand for affordable housing.<sup>1</sup> HACL A is currently responsible for nearly 73 percent, or 75,400, of the City of Los Angeles's approximately 103,170 affordable housing units (excluding rent control units). However, the total available supply is well below current market needs, according to public records. HACL A has a primary goal to preserve its existing affordable housing supply of 75,400

---

<sup>1</sup>Housing Authority of the City of Los Angeles, *Jordan Downs Redevelopment Project Site and Study Area*, 2007.

units and spearhead a collaborative effort to increase the supply of affordable housing in the City of Los Angeles by 30,000 units within the next ten years.

### **C. IRREVERSIBLE ADVERSE ENVIRONMENTAL CHANGES**

According to Section 15126.2(c) of the CEQA Guidelines, an EIR is required to evaluate significant irreversible environmental changes that would be caused by implementation of the proposed project. As stated in CEQA Guidelines Section 15126.2(c):

“[u]ses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.”

Irreversible adverse environmental changes are anticipated for the proposed project. Construction and operation of the proposed project would rely upon the use of nonrenewable resources. Use of fossil fuel-derived energy sources such as gasoline, diesel fuel, electricity, and natural gas would be necessary for transport of workers and materials during construction and provision of electricity and natural gas for the new homes during the life of the project. Although fossil fuel consumption associated with the proposed project would constitute the depletion of a resource that is irretrievable and irreversible, the amount of resources consumed would not be of an extraordinary nature in a regional context.

### **D. GROWTH INDUCING IMPACTS**

Section 15126.2(d) of the CEQA Guidelines states that the assessment of growth-inducing impacts in the EIR must describe the “ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.”

The primary goal of the proposed project is to reinvest in redevelopment of blighted infrastructure in a community that has long lacked investment. The Specific Plan includes housing elements that will increase the population of the Specific Plan area as discussed in Section IV.P Population, Housing, and Employment. The growth would be consistent with the anticipated regional growth in the City and County of Los Angeles. The proposed project includes building housing in the Specific Plan area, whose vicinity is already developed with housing, roads, and utility infrastructure. Although additional infrastructure would be required due to the additional housing, it is unlikely that surrounding areas would see direct population, housing, or employment growth due to the proposed project. However, one of the policy goals of the proposed project and of HACLA is that the proposed project would become a catalyst for redevelopment of other blighted areas surrounding the Specific Plan area. Therefore, potential indirect population, housing, or employment growth is feasible.

### **E. POTENTIAL SECONDARY EFFECTS**

Section 15126.4(a)(1)(D) of the CEQA Guidelines requires that “if a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure shall be discussed but in less detail than the significant effects of the project as proposed.” With regard to this section of the CEQA Guidelines, all of the identified mitigation measures are intended to reduce impact level of significance. As discussed in the “6. Level of Significance” sections of each sub-chapter of Chapter IV, all mitigation measures that are identified would reduce

impacts and not create new ones. Therefore, no secondary impacts are anticipated due to the implementation of the proposed mitigation measures.

**F. EFFECTS DETERMINED NOT TO BE SIGNIFICANT**

Section 15128 of the CEQA Guidelines states that an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the EIR. All environmental topics required for analysis under CEQA were analyzed in detail, and presented in the EIR. No further discussion is required.